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POSTAL REGULATORY  
COMMISSION  
OFFICE OF THE SECRETARY

From: Laurel V. Munk  
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AUG 12 2011  
Office of PAGR

Re: Docket #1383312-22654

I wish to object strongly to the USPS determination to close the Star Tannery Virginia Post Office. I request that the PRC not affirm the USPS determination for the following reasons.

1. The USPS decision to close the Star Tannery Post Office is not in accordance with the law. I refer to Title 39 USC §101(b), which states in part that "No small post office shall be closed solely for operating at a deficit."

Mr. Voorhees and Mr. Furey have made it clear that their motivation in deciding on closure is because the Star Tannery Post Office does not bring in enough revenue to recover operational costs. The deficit is \$21,988 per year.

Items mentioned in the record, such as the number of box holders, the retirement of a postmaster in 2009, etc do not meet the criteria to which the USPS must adhere in making closure decisions. Again, 39 USC §401(d)(2)(A)(iii) states the USPS must consider "whether such closure or consolidation is consistent with the policy of the Government, as stated in section 101(b) of this title, that the Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, communities, and small town where post offices are not self-sustaining."

2. The USPS decision to close is not in accordance with the law in one other respect—that of providing "maximum and effective" service. The alternative of postal services through the Strasburg facility and increased dependence on the rural carrier does not provide "maximum" or "effective" service, as Mr. Voorhees and Mr. Furey claim. They are wrong.

The elderly and handicapped in our community particularly object to the lack of access for the handicapped at the Strasburg Post Office. The "solution" proposed by USPS is for handicapped patrons to pull up to the building, honk their horns, and wait in their autos until one of the clerks inside hears the noise and comes out to investigate. This is demeaning and humiliating. It is not effective for the patron outside (who must keep the engine running to stay warm in cold weather and cool in hot weather), the patrons inside (who must wait in line while the clerk leaves the building), or the clerk (who must make repeated climbs up and down the steep steps).

The idea that the rural carrier will come to the house for package delivery or other services is also not effective. Mail is currently delivered on the 80-mile route late in the afternoon as it is. If the USPS makes good on their assertion that carriers will come to the house, mail will be delayed or additional staff will be needed. Neither outcome is effective.

3. Mr. Voorhees and Mr. Furey have knowingly and deliberately misrepresented the community input in the record. First, the record claims that only 7 respondents to the community survey opposed closure. In fact, many of the 113 survey respondents were opposed to closure, but did not realize that they had to use the words "I object" or "I disagree" or "I protest" in order for their input to be counted as opposition. The fact that these negative responses were misrepresented as "concerns" or that the respondents had "no opinion" is inexcusable.

Another falsehood in the record relates to the USPS characterization of the community meeting on March 9. Mr. Voorhees reports the meeting as having 80-100 citizens "attending." I was there—these people did more than attend—they voiced strong opposition to any closure, pointed out the flaws in the Strasburg/carrier alternative, and even agreed to reduced hours as a means of keeping the Post Office in Star Tannery. In omitting this from the record Mr. Voorhees has acted capriciously and arbitrarily. And despicably.

4. Finally, I must report that Mr. Furey lied to the community about the options other than closure. In that March 9 community meeting, I asked Mr. Furey what options we had other than the Strasburg/carrier alternative. His response? "None."

In fact, the community is aware that the USPS could have explored and offered to transition the Star Tannery Post Office to level "C" (part-time) operations, as it has considered for the Fort Valley Post Office (which, by the way, generates the same number of hours of work). The community is also aware of two USPS employees who have stated publicly that they would welcome the chance to work part-time in Star Tannery.

Mr. Voorhees and Mr. Furey assured the community on March 9 that the decision was not predetermined and that they were still open-minded. Yet, it is clear from their claim that we had no options that they had decided.

The citizens served by the Star Tannery Post Office (which includes people in Zepp and Mountain Falls) deserve the maximum and effective postal service that the law guarantees. The decision for closure with service via Strasburg and carrier offers neither maximum nor effective service. Furthermore, the statements in the record by Mr. Voorhees and Mr. Furey do not reflect reality. As one of our local elected officials put it, "they have been stingy with the truth."

For the reasons stated above, I do not believe that the decision for closure meets the criteria the PRC must apply to affirm the USPS decision.

