

August 24, 2011

I, Lelia Vaughan, a Jonesville, Texas Post Office 75659 customer, request a late acceptance and motion for intervention to allow my participation in opposing the N2011-1 docket entitled "Retail Access Optimization Initiative, 2011." My Jonesville, Texas USPS Post Office 75659 was listed among the many post offices across the country. On April 27, 2011 I immediately began researching ways to oppose the initiative which failed to consider the potential impacts on small rural communities such as mine. It was very difficult to ascertain to whom such concerns and complaints should be written. The Jonesville Post Office 75659 has a postal clerk, not a Postmaster. News media reports made it very clear that USPS employees had been instructed to not openly make comments about the process. In an effort to protect our postal clerk, I did not ask her specific questions which could endanger her job. As a result, I had to research online. Finally, I found Ruth Goldway's name and sent an email request to her for help. I received a reply August 9, 2011 from Annie Kennedy, but the reply did not mention that there was an August 19, 2011 deadline for opposing N2011-1. On August 16, 2011 I sent an email request to Tracy N. Ferguson for help, but the email address I used was incorrect. I sent a copy of my request to Tracy Ferguson by postal service. Tracy Ferguson advised me of my right to file for late acceptance and motion to intervene. With that in mind, I hereby request exception to the deadline and to be permitted to submit concerns and comments.

**Residents in small rural communities rely upon their post offices for safe and secure mail delivery to rented mail boxes contained within a USPS building.**

Rural areas in my county are continually being threatened by increases in attempted burglary and vandalism. I know of three such reported instances of attempted burglary and real burglary within the last two weeks in our community. Rural mail box delivery is not safe for those who receive checks in the mail.

**Rural residents in our community typically drive to our post office.** Some residents live five miles from Jonesville Post Office. I know of one mail box customer who drives even further to get his mail. Some of our rural residents do not have the means for additional driving time and cost for driving to neighboring post offices. I live across the road from the post office, but if our post office would close, I would have to drive 10 miles round trip to the closest town of Waskom, Texas to retrieve my mail. Those who live further out in our community would have to drive 20 or so miles round trip. That would create a financial burden on many residents and a time burden on all.

**The N2011-1 RAO Initiative fails to consider the impact of closing a post office on rural residents and businesses in communities such as in Jonesville Texas 75659.**

The RAO Initiative obviously failed to consider growth in communities, increases in population, and changes in the businesses in the community. As an example, three years ago, a business structure on FM 134 was destroyed by fire. That structure contained offices of EXCO Resources which has now become a significant oil/gas exploration company in the United States. EXCO was initially named Winchester Oil

Production and Westchester Gas. That company was founded in Jonesville, Texas. TGGT, one of the major gas gathering and transmission companies just recently completed moving its office back to Jonesville. Not only would residents be impacted, but businesses would suffer time and financial burdens attributable to having to use a safe and secure post office further away than the current one in Jonesville. Rural delivery at the street would be contraindicated due to the valuable documents and checks being received and distributed from such businesses. Similarly, if our Jonesville Post Office is closed, other small businesses, partnerships, limited liability companies, non-profit foundations and organizations, and home-based businesses could suffer.

**Preliminary research by those who determined that Jonesville Post Office 75659 should be considered for discontinuance, failed to take into consideration the current status of our community, current post office box revenue and patronage, current need for rural post office, and current decline in overall postal service use across the country.** Large post office have experienced declines as have small post offices. Rural post offices serve rural areas, some of which do not have their own governmental entities for providing community services such as bulletin boards, meeting places, etc. Why close rural post offices that seem to be doing well and improving?

**RAO Initiative N2011-1 fails to make District Officers accountable for disclosing inaccurate information which may have led to some post offices being put on the list for discontinuance.** It also fails to provide adequate protest information to the general public, the citizens for which postal service is intended. If it is difficult for me to obtain answers from the District Manager, how difficult has it been to get answers elsewhere and by other communities? I still do not even know the name of our District Manager nor do I know the name of the person to whom I should address a request to to maintain our community's identity as Jonesville, Texas 75659 regardless of the final decision about discontinuance. I've had to send requests for information to Job Titles rather than to actual names of individuals in those positions. I asked my postal clerk for such specific information, but she was told by USPS not to disclose employee address information.

**N2011-1 RAO Initiative failed to consider sound alternative solutions to prevention of discontinuance of small rural post offices, but rather seemed to find excuses for imposing burdens on rural residents.** The lessor of our Jonesville Post Office facility offered to reduce lease rental fees by 50%, but the USPS lease rental agent did not seem interested and said it would not help. Is the RAO Initiative intended to achieve better financial status for the United States Postal Service??? Other ways to improve financial matters would be to increase post office box rental fees, reduce the hours of operation of the retail window, and restrict mail delivery to five days a week only. Small rural post offices should be continued to sustain the essence of postal delivery.

**How credible and valid will feasibility study results be?** Who has been given responsibility for developing questionnaires? Will those questionnaires be specifically designed for rural communities? Will the instrument designer be qualified to construct

such questionnaires? Will the individuals assigned responsibility for interpreting community answers on such questionnaires be qualified? What educational backgrounds are required by the USPS for development of research projects such as required in this RAO Initiative? Will conclusions be drawn by researchers with sufficient educational credentials and advanced degrees.? A discontinuance decision should be based on credible and valid facts based on current information. A discontinuance decision should not be left in the hands of inadequately educated, inadequately trained, nor insufficiently prepared individuals.

**Earned work load determination should not be used as the one and only reason for discontinuance of a post office.** If earned workload based on incoming/outgoing mail, post office rental box delivery, and retail window sales and service is to be used in determining discontinuance, the USPS should seek ways to resolve the matter rather than to condemn and impose impacts on the community at large. Reduce the hours of operation and increase post office box rentals. Simple solution.

**Discontinuance could lead to a community losing its identity and recognition which could severely impact the future existence of communities.** Jonesville, Texas has had a post office since 1847. That was before The United States Treaty with Mexico which ended the Mexican War. Failure to recognize the significance of such postal service without regard for longevity and community need is evidence of incompetent decision making within USPS management. Decisions made without consideration for a rural post office's increasing revenue is unacceptable.

**Protection and continuation of small rural post offices will lessen the financial impact on residents in such communities.** Continuation of small rural post offices which have increasing population and increasing revenues, reducing the hours of operation in small rural post offices which seem to have low earned work loads, and reducing the hours of retail window service are legitimate practical alternative solutions that warrant immediate consideration by the United States Postal Service. Ignoring the needs of the small rural communities and adding financial and driving time burdens on residents in such small rural communities will not help the United States Postal Service. If there has been a nationwide decline in postal service usage, why condemn the small or rural communities?

**If small rural post offices only are responsible for a very low percentage of the overall USPS budget, how could elimination of the small rural post offices truly help overcome budgetary problems attributable to other major USPS expenditures across the country????** Discontinuing rural post office rental mail box delivery in Jonesville Texas 75659 and in other small rural communities will possibly lead those residents to seek other means for communication with friends, family, and businesses. Forcing small communities to lose their community zip codes and community identity will create great distrust in the USPS.

Submitted by Lelia Vaughan, Ed. D.  
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