

SEP 2 2011

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268

RECEIVED

2011 SEP -2 P 1:47

In the Matter of:

GRANT, Iowa 50847  
Post Office State ZIP Code

POSTAL REGULATORY  
COMMISSION  
OFFICE OF THE SECRETARY  
Docket No: A 2011-44

Laurenda Mifflin, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the GRANT post office. The Final Determination was posted 8-1-2011.  
(date)

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

see attached

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1. On page 3 of the Final Determination to Close the USPS claims they will save \$22,547 annually and at the same time on page 8 they claim they will have an annual savings of \$18,957. Why isn't there a quote for curb service as well as cluster boxes? (item 1)

2. (item 2) Section 101(b) of title 39 of the U. S. code says the USPS shall provide a MAXIMUM degree of effective and regular postal service to rural areas and small towns where post offices are not self sustaining. The USPS claims that cluster boxes are needed if you want to keep your current zip code because the carrier would have to use a tray for Villisca and a tray for Grant for curbside service (Final determination to close, page 2 concern 2 and page 3 concern 3). 1. He already carries 2 trays. 2. He would still carry 2 trays even if the cluster boxes are installed because several people on the outskirts of Grant have a Villisca address. The cluster boxes would have a Grant address (2 trays). So why would our address have to change? Nothing to do with the trays like stated. Page 3 concern 3 also states the Postal service is seeking more cost effective means of service while still maintain (their typo) effective and regular service. The USPS is supposed to give MAXIMUM effective and regular service. The USPS claims we can get services from the carrier at the cluster boxes . NO ONE knows (including the carrier) what time he will arrive each day. It will vary because of various factors. Page 6 concern 12 states door delivery eliminated as an option for new residential areas. We are NOT new., Page 6 concern 13 states that when there is a vacancy in a small office, it is customary to conduct a study of the business... There was a vacancy because the USPS did not hire a Postmaster. The USPS hires them and they cannot use their purposeful neglect of not hiring one to close our post office. Page 5 concern 7 states carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to cluster box units. Excuse Me? I don't live in the cluster boxes. The maximum

degree of effectiveness for me would be having the Post Office, next would be curb service as I can watch out my window for the carrier and not freeze to death or get frostbite. It also states that a customer may file for hardship delivery. In interviews (items 3 and 4) with the Griswold American and the Des Moines Register, Lindauer told them that if a person still drives or has a valid driver's license they would be denied hardship (therefore no home delivery). I don't drive in the winter. I have arthritis, asthma and several other medical conditions. I cannot possibly dig out my car. If I could I could walk to the cluster boxes. As it stands now when I get to the Post Office I have a way to warm up and I don't have to use a key (we have combination locks). With a curb box I could stay warm and watch for the carrier. We have no public transport here. In an interview (item 5) with the Red Oak Express, Lindauer said one advantage of the cluster boxes over curb service is they are more safe and secure. I can put a lock on my curb box and give the carrier a key. Safe? For what or who? It's not safer for the carrier. He stays in his car for curb service but has to get out for the cluster boxes. More chance of being robbed or slipping on ice. Not safer for the customer. I could easily get frostbite, slip and injure myself or freeze to death. Safer for the mail? How is it safer to be away from where you can easily see it? Or in a box inside the Post Office? The carrier told me he receives 1 extra minute per week for each curbside box he delivers to. I have offered in previous letters to the USPS to pay that 1 extra minute but never received a response.

3. Sarah Lindauer, at the public meeting Grant, and Richard Watkins (a spokesperson for USPS) in an interview with the Red Oak Express said that the USPS does not use our tax dollars. (item 6) A news release by the Federal Trade Commission (item 7) states the USPS receives \$39-117 million per year as a subsidy.

4. Not a detriment. Having our Post Office closed is not just an inconvenience. It's downright dangerous for some of us. Over 1/3 of us are

senior citizens (item 8, map of Grant and approximate ages of citizens as of survey). Going several blocks in the middle of winter to get our mail/ medications can literally kill us from exposure or get frostbite or fall and be seriously injured. I can't dig my car out with my medical conditions. We do not have public transport here. The USPS says we can go to the Villisca or Elliott Post Offices but Elliott for sure is on the closure list. Villisca is 17 miles away. Gas is very expensive. Even if I had the gas money I can't dig my car out. As it is I can warm up, don't have to have a key in arthritic fingers. The USPS says customers (page 7 concern 5) won't have to pay box fees. We don't pay any now. The Post Office in Villisca is a long distance call. There is no set time for the mail carrier to arrive at the boxes.

5. I have not been given an answer as to what can be done to keep the Post Office from closing.

6. The Final Determination to Close was done very poorly (obviously not proofread). Examples: page 7 concern 2 and 4, pages 2 and 3 concerns 2 and 3, page 4 and 5 concern 3 and 4, page 5 and 6 concern 8, 9, and 10, page 5 and 6 concern 7 and 17. These are just a few examples of inadequacy of a document. A lot of the answers were wrong, misleading, inaccurate, or didn't make sense and were repetitive.

7. I was not given all the facts about the proposal to close so how can I make a solid defense ? (such as what does it take to keep it open?)

8. Final Determination to Close page 3 concern 8 (special needs). I asked the postal person in charge if she could make home delivery for me and she said that she wasn't allowed to do it for anyone.

9. The small post offices use only .07% of the entire budget of the USPS so closing every one of them won't make a dent in their financial dilemma.

The Maximum and effective regular service would be 1. Post Office and home delivery. 2. Next down the list a Post Office. 3. Next down is curbside

delivery. 4. Next is cluster boxes. 5. Last is no delivery. The USPS did a better job with ponies. Maybe we should use them again.

Thanks for hearing me out,

Sincerely,

Laurenda Mifflin

P. O. Box 175

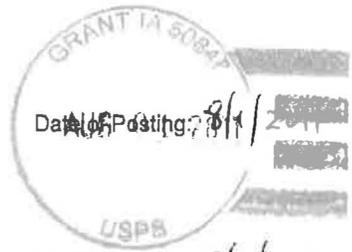
Grant, Iowa 50847

*Laurenda Mifflin*

*Copies to: Steve King Iowa  
Governor  
President Obama*

A2011-44

DOCKET NO. 1365387 - 50847  
ITEM NO. 67  
PAGE 1



Date of Removal: 9/2/2011

item 1

FINAL DETERMINATION TO CLOSE  
THE GRANT, IA POST OFFICE  
AND ESTABLISH  
SERVICE BY RURAL ROUTE SERVICE

DOCKET NUMBER 1365387 - 50847

A2011-44

## I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is issuing the final determination to close the Grant, IA Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Villisca Post Office, located 17 miles away. Service will be provided to cluster box units (CBUs).

CBUs are secure free-standing units of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. A parcel locker may also be installed.

The postmaster position became vacant when the postmaster retired on July 10, 2010. Since the postmaster vacancy an OIC has been installed to operate the office. Postmaster level and office service hours are determined by a workload analysis which includes the number of deliveries and revenue.

The office was studied for possible closing or consolidation due to the following reasons: Study for discontinuance request based on minimal workload, revenue, need for more operational efficiency, and the ability of the Postal Service to provide effective and regular service by an alternate means.

The Grant Post Office, an EAS-53 level, provides service from 08:30 - 13:00 Monday - Friday , 09:00 - 11:00 Saturday and lobby hours of 7:00-19:00 on Monday - Friday and 7:00-19:00 on Saturday to 44 post office box or general delivery customers and no delivery customers. Retail services included the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.

The retail window averaged 12 transaction(s) accounting for 12 minute(s) of retail workload daily. With minimal workload, the Postal Service feels that effective and regular service will be provided by rural route service. Office receipts for the last 3 years were: \$11,740 ( 31 revenue units) in FY 2008; \$11,757 ( 31 revenue units) in FY 2009; and \$9,034 ( 24 revenue units) in FY 2010. There were no permit mailer(s) or postage meter customer(s).

On February 23, 2011, representatives from the Postal Service were available at to answer questions and provide information to customers. 47 customer(s) attended the meeting.

On February 14, 2011, 45 questionnaires were distributed to delivery customers of the Grant Post Office. Questionnaires were also available over the counter for retail customers at the Grant Post Office. 27 questionnaires were returned. Responses regarding the proposed alternate service were as follows: 3 favorable, 13 unfavorable, and 11 expressed no opinion.

One congressional inquiry was received on February 22, 2011.

A petition supporting the retention of the Grant Post Office was received on February 23, 2011, with 73 signatures.

When this final determination is implemented, delivery and retail services will be provided by the Villisca Post Office, an EAS-16 level office. Window service hours at the Villisca Post Office are from 08:30 16:00, Monday through Friday, and none on Saturday. There are 100 post office boxes available.

The proposal to close the Grant Post Office was posted with an invitation for comment at the Grant Post Office , Elliott Post Office and Villisca Post Office from March 22, 2011 to May 23, 2011. The following additional concerns were received during the proposal posting period:

1. **Concern:** Customer wanted a handwritten response.

**Response:**

The customer stated on the comment form that you wanted to handwritten response. We apologize but cannot fulfill your request to have a handwritten response. The Postal Service is continually looking for means to be efficient and cost effective. Handwriting responses would take more time and therefore would incur an unnecessary cost for the Postal Service.

2. **Concern:**

Customers questioned as to why install CBUs and not allow people to install a box in front of their home.

**Response:**

The customer questioned as to why you couldn't have a box in front of your home. The goal of the Postal Service is to allow the community to maintain Grant, IA 50847 in their address. In order to do that, deliveries with the same zip code, need to be commingled all together. Carriers deliver directly from a tray that comes ready for delivery and having two different zip codes would require the carrier to work out of two trays. This would be a very inefficient means of delivery and would encourage misdeliveries. As a solution, the Postal Service is proposing CBUs. Customers may be able to obtain curbside delivery but it may mean that they would need to change their address to Villisca, IA 50864. It may also mean that it wouldn't be in front of their house for the more the carrier travels, the more it costs the Postal Service.

3. **Concern:** Customers questioned as to why install CBUs and not allow people to install a box in front of their home.
- Response:** The customer questioned as to why you couldn't have a box in front of your home. The goal of the Postal Service is to allow the community to maintain Grant, IA 50847 in their address. In order to do that, deliveries with the same zip code, need to be commingled all together. Carriers deliver directly from a tray that comes ready for delivery and having two different zip codes would require the carrier to work out of two trays. This would be a very inefficient means of delivery and would encourage misdeliveries. As a solution, the Postal Service is proposing CBUs. Customers may be able to obtain curbside delivery but it may mean that they would need to change their address to Villisca, IA 50864. It may also mean that the mailbox wouldn't be in front of their house for the more the carrier travels, the more it costs the Postal Service. The Postal Service is seeking more cost effective means of service while still maintain effective and regular service.
4. **Concern:** Customers questioned that the Postal Service was pursuing discontinuance of the Grant Post office because it is running at a deficit.
- Response:** The customer stated on the comment form that it was stated in the proposal that the reason for the study was because the office is running at a deficit. The proposal states that the reason for the study was due to "minimal workload, volumes, revenue, need for more operational efficiency, and the ability of the Postal Service to provide effective and regular service by an alternate means". Whether or not this office is running at a deficit is not one of the reasons that we are looking at possible discontinuance. The Postal Service projects to save \$22547 as year. Further comparisons as you have requested are not part of the study and may be requested through the Freedom of Information Act. Instructions on requesting that information can be found at [www.usps.com](http://www.usps.com).
5. **Concern:** Customers were concerned about customers standing around waiting for the carrier to perform postal transactions.
- Response:** The customer were concerned about customers standing around waiting for the carrier to perform postal transactions. Customers may leave packages or stamp orders in their mailbox for the carrier. However, for packages that will not fit, we ask the customer to call the administrative office to see what their options are.
6. **Concern:** Customers were concerned about obtaining accountable mail and large parcels.
- Response:** The customer stated that several people work out of town and cannot sign for accountables. If the customer lives less than one-half mile from the line of travel, the carrier will attempt delivery of accountable items and large parcels to the customer's residence. If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox. Large parcels will be left outside the mailbox or at a location designated by the customer (if authorized by the customer), or a notice will be left in the mailbox. Attempted delivery items will be taken back to the Villisca Post Office. Customers may pick up the item at the post office, request redelivery on another day or authorize delivery to another party.
7. **Concern:** Customers were concerned about obtaining services from the carrier.
- Response:** The customer stated that going to the Elliott or Villisca Post Offices are not convenient and the carrier cannot take care of all postal transactions. The carrier can perform nearly all postal transactions right from their vehicle. For those transactions that cannot be performed by the carrier, the customer is encouraged to stop at a Post Office in conjunction with other trips such as grocery shopping.
8. **Concern:** Customers were concerned about the handicapped information presented on the Post Office Survey Sheet.

**Response:**

The customer questioned as to why the Post Office Survey Sheet stated that there were no customers with disabilities. When performing the study, we are looking for customers that have special needs that need special accomodation. At the time of the study, the officer in charge was asked if they were aware of any customers with special needs that we perform special accomodation for. The answer was no. As a result, we answered no to the statement in question. We will change the form and answer yes but will also state that no special accomodations have been made at this time.

9. **Concern:**

The customers wanted to know what the Postal Service was doing to cut costs.

**Response:**

The customer asked on the comment form what other measures the Postal Service is taking to reduce expenses. The Postal Service is consolidating plants, looking at small post office and station discontinuance, working with unions to help lower employee salary expenses, and raising rates for large mailers, freezing wages, and reducing benefits for all employees to name a few of the many means of cost reduction. The Postal Service is also asking congress to reconsider the mandated 6 day delivery requirement and to allow deferred payments to the retirement prefunded accounts.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

1. **Concern:**

Customer expressed a concern about package delivery and pickup.

**Response:**

The customer expressed a concern about package delivery and pickup. Rural carriers will deliver packages that fit in your rural mail box, if the package does not fit in the mail box, the carrier will deliver the package up to ½ mile off of the line of travel, at a designated place, such as on your porch or under a carport. If the package needs to be signed for, the carrier will leave a notice in your box. Customers may then pick up the item at the Post Office, request redelivery on another day, or authorize delivery to another party.

2. **Concern:**

Customers said they would miss the special attention and assistance provided by the personnel at the Grant Post Office.

**Response:**

The customer have express concern regarding the special assistance you received in regards to stamp selection. Courteous and helpful service will be provided by personnel at the Villisca Post Office and from the carrier. Special assistance will be provided as needed.

3. **Concern:**

Customers were concerned about obtaining services from the carrier

**Response:**

The customer were concerned about obtaining services from the carrier, retail services provided at the post office are available from the carrier. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Listed below are some services available from the carrier and how to obtain them. PURCHASING STAMPS BY MAIL: The Stamps by Mail Program provides customers the opportunity to purchase stamps, envelopes, and postal cards by using Form 3227-R, Stamp Purchase Order (Rural), available from the post office or the carrier. Commemorative stamps and stamp collecting products are also available. The customer addresses the postage paid order form envelope, encloses payment by personal check or postal money order made payable to the US Postal Service, and mails the form (postage-free) or leaves it in the mailbox for the carrier to pick up. Most orders are processed overnight, and some immediately. PURCHASING POSTAL MONEY ORDERS: Customers may purchase money orders by meeting the carrier at the mailbox, completing an application, and paying the carrier (in cash) the price of the money order, plus the fee. The carrier gives the customer a receipt for the application. The money order is completed when the carrier returns to the post office, and a money order receipt is left in the customer's mailbox on the next delivery day. Most customers provide the carrier with a stamped, self-addressed envelope in which the completed money order is mailed to its destination. If customers prefer, the completed money orders will be

returned for verification on the next delivery day. ~~SPECIAL SERVICES:~~ Special services such as certified, registered, Express Mail, delivery confirmation, signature confirmation, and COD may be obtained from the carrier by leaving a note in the mailbox, along with the appropriate payment. The carrier will provide the services that day and leave a customer receipt in the mailbox on the next delivery day. **HOLDING MAIL:** Customers who will be away for an extended time, such as a vacation, may request that their mail be held at the post office during their absence. Upon return the customer asks the post office to resume deli

4. **Concern:** Customers were concerned about obtaining services from the carrier
- Response:** The customer were concerned about traveling to nearby Post Office to perform postal transactions. Retail services provided at the post office are available from the carrier. Most transactions do not require meeting the carrier at the mailbox. Carriers will accept packages at the mailbox without the customer being present, provided the postage is fully prepaid, and the customer is known to reside or conduct business at the collection point. The package MUST have a matching return address that is the same as the collection point. Estimate the amount of postage needed and leave the money in the mailbox. If insurance is desired, the value of the contents must be specified. The carrier will take the package to the Post Office, and it will be weighed to determine the appropriate rate. The package will be mailed that same day. The carrier will leave the customer's change and insurance receipt, if appropriate, in the mailbox on the next delivery day.
5. **Concern:** Customers were concerned about senior citizens and people with disabilities obtaining Postal Services.
- Response:** The customer expressed a concern about senior citizens. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to Cluster Box Units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
6. **Concern:** Customers were concerned about senior citizens and people with special challenges.
- Response:** The customer expressed a concern about senior citizens and people with special challenges Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to cluster box units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
7. **Concern:** Customers were concerned about senior citizens.
- Response:** The customer expressed a concern about obtaining mail in poor weather conditions. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to Cluster Box Units. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
8. **Concern:** Customers were concerned about the loss of a gathering place and an information center.
- Response:** The customer have stated that the people in the community use the post office for their social outing. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
9. **Concern:** Customers were concerned about the loss of a gathering place and an information center.

- Response:** The customer have stated that you use the Grant Post Office to read town business reports and other reports. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
10. **Concern:** Customers were concerned about the loss of a gathering place and information center.
- Response:** The customer have stated that you visit friends at the Post Office when you pick up your mail. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
11. **Concern:** Customer expressed a concern about package delivery and pickup
- Response:** Rural carriers will deliver packages that fit in your cluster box unit or in the parcel locker. If the package does not fit, the carrier will deliver the package up to ½ mile off of the line of travel, at a designated place, such as on your porch or under a carport.
12. **Concern:** Customers asked why door delivery service was not available to them.
- Response:** The growth of suburban areas and the shift of population to one geographic area to another have created new challenges for the Postal Service. To meet these challenges, delivery regulations were changed in 1978 to eliminate door delivery as an option for new residential areas. Current delivery options are roadside of centralize deliveyr provided by motorized carrier.
13. **Concern:** Customers asked why their post office was being discontinued while others were retained
- Response:** Post offices are reviewed on a case-by-case basis. When there is a vacancy in a small office, it is customary to conduct a study of the business activity and investigate the feasibility of providing service by alternate means.
14. **Concern:** Customers inquired about cluster box unit installation and maintenance.
- Response:** Cluster Box units are purchased, installed, and maintained by the Postal Service at no expense to customers.
15. **Concern:** Customers inquired as to what degree of volume was needed to have Grant not be considered for discontinuance.
- Response:** Volume is not the only factor that is taken into consideration when making a proposal to discontinue an office. Other factors such as revenue and the ability of the Postal Service to provide effective and regular delivery are also taken into consideration. As a result, there is no set amount that would curtail the study for discontinuance in any office.
16. **Concern:** Customers questioned the economic savings of the proposed discontinuance
- Response:** Carrier service is more cost-effective than maintaining a postal facility and postmaster position. The Postal Service estimates a positive annual savings.
17. **Concern:** Customers were concerned about senior citizens
- Response:** Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to CBUs. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.
18. **Concern:** Customers were concerned that boxes would be installed along highway 71

**Response:**

We will be proposing to install cluster box units at one or multiple 7 locations throughout the community. The location will be a place that is safe for both the carrier and the customers. If a location along highway 71 will serve the people efficiently, effectively, and is safe, to may be considered.

**Some advantages of the proposal are:**

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

**Some disadvantages of the proposal are:**

1. The loss of a retail outlet and a postmaster position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

Taking all available information into consideration, the Postal Service concludes this final determination will provide a maximum degree of effective and regular postal services to the community.

**II. EFFECT ON COMMUNITY**

Grant is an incorporated community located in Montgomery County. The community is administered politically by Mayor and Council. Police protection is provided by the Montgomery County Sheriff. Fire protection is provided by the Grant Fire Department. The community is comprised of Retirees, Self employed, Commuters and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Grant Fire Department, Grant Methodist Church, City of Grant, Legion Auxillary, Legion Post LGN0445, The Hayloft, Swartz Implement, Chase Rebuilders, Grant Communications, Amos Fabulous Foods, Devo Properties, Rainey Rentals, JC Home Improvement, JC Repairs, JC Greenhouse, Fountain Perk LLC. . Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Grant Post Office will be available at the Villisca Post Office. Government forms normally provided by the Post Office will also be available at the Villisca Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

1. **Concern:** Customers expressed concern for loss of community identity  
**Response:** The customer expressed a concern about the loss of the community's identity. A community's identity derives from the interest and vitality of its residents and their use of its name. The Postal Service is helping to preserve community identity by continuing the use of the suspended Post Office name and ZIP Code in addresses and in the National Five-Digit ZIP Code and Post Office Directory.
2. **Concern:** Customers were concerned about the loss of a gathering place and an information center.  
**Response:** The customer stated in the questionnaire that you used the Post Office to meet with neighbors. Residents may continue to meet informally, socialize, and share information at the other businesses, churches, and residences in town.
3. **Concern:** Customers were concerned about the loss of employment.

**Response:**

The customer have stated that the Postal Service is placing people out of work by closing the Grant Post Office. The Officer in Charge is a career employee that will not be separated from the Postal Service. She will return to her home office and continue employment. The postmaster replacement is not a career employee, however, she may be reassigned to another office if there is an available position that she is qualified for.

4. **Concern:**

Customers were concern about the loss of a gathering place and an information center.

**Response:**

The customer stated on the comment form that there were only 3 businesses where people can get together. If people cannot gather at the existing businesses, they can gather at residences in town.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this final determination will not adversely affect the community.

**III. EFFECT ON EMPLOYEES**

The postmaster position became vacant when the postmaster retired on July 10, 2010. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected. Since the postmaster vacancy an OIC has been installed to operate the office.

**IV. ECONOMIC SAVINGS**

The Postal Service estimates an annual savings of \$ 18,957 with a breakdown as follows:

Postmaster Salary (EAS-53, No COLA)	\$ 15,350
Fringe Benefits @ 33.5%	\$ 5,142
Annual Lease Costs	+ \$ 3,400
Total Annual Costs	\$ 23,892
Less Annual Cost of Replacement Service	- \$ 4,935
Total Annual Savings	<u>\$ 18,957</u>

A one-time expense of \$ 2077 will be incurred for the movement of this facility.

**V. OTHER FACTORS**

The Postal Service has identified no other factors for consideration.

## VI. SUMMARY

This is the final determination to close the Grant, IA Post Office and provide delivery and retail services by rural route service under the administrative responsibility of the Villisca Post Office, located 17 miles away. Service will be provided to cluster box units (CBUs).

The postmaster retired on July 10, 2010. If the office has a noncareer PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. The workload has declined. Effective and regular service will continue to be provided by rural route service.

The Grant Post Office provided delivery and retail service to 44 PO Box or general delivery customers and no delivery route customers. The daily retail window transactions averaged 12. There are no permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$18,957 annually. A disadvantage to some will be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

## VII. NOTICES

- A. **Support Materials.** Copies of all materials upon which this final determination is based are available for public inspection at the Grant Post Office, Elliott Post Office and Villisca Post Office during normal office hours.
- B. **Appeal Rights.** This final determination to close the Grant Post Office may be appealed by any person served by that office to the Postal Regulatory Commission at 901 New York Ave NW, Suite 200, Washington DC 20268-0001. Appeals must be received by the Commission within 30 days of the date this final determination is posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission or the parties to the appeal will be made available for public inspection at Grant Post Office, Elliott Post Office and Villisca Post Office during normal office hours.



\_\_\_\_\_  
Dean J Granholm  
Vice President of Delivery and Post Office Operations

07/27/2011

\_\_\_\_\_  
Date

item 2

## THE APPEALS PROCESS MAY SAVE A POST OFFICE, BUT ONLY IF USED

By the Hon. Wayne Schley  
Former Postal Rate Commissioner

Section 101(b) of Title 39 of the U.S. Code reads as follows:

"The Postal Service shall provide a maximum degree of effective and regular postal service to rural areas, and small towns where post offices are not self-sustaining. *No small post office shall be closed solely for operating at a deficit* (emphasis mine), it being the specific intent of the Congress that effective postal services be insured to residents of both urban and rural communities."

Too often this section of the law governing the U.S. Postal Service has been overlooked or not carried out in the spirit that Congress intended. Consequently, in 1976 Congress added a new responsibility to the Postal Regulatory Commission (PRC). That new task was the responsibility of serving as an appellate court, so to speak, for those interested citizens who wished to object to any action to close or consolidate their local post office.

The idea was to allow the local citizens to ensure the law was being carried out as Congress intended. Since the PRC accepted this new responsibility, there have been 292 appeals by citizens to stop the taking away of their post offices. Of these, 54 have been remanded, or rejected, and sent back to the Postal Service.

It should be noted, however, that 22 of these rejected cases occurred in the first year when the Postal Service was learning how to go about the process of closing a post office. The agency has learned its lesson well; in the past 19 years, it has lost only 32 cases.

Of the almost 300 cases appealed before the PRC, 66 have been dismissed or withdrawn by the Postal Service. These cases, by and large, were ones so deficient that the Postal Service itself withdrew its efforts to close or consolidate the post offices.

One startling fact should be noted: Less than 8 percent of all post office closings or consolidations are appealed. It is hard to believe that 100 percent of the people in 92 percent of the communities faced with the loss of their post offices do not object. I suspect the real reason for so few appeals is that folks simply do not know that you can fight City Hall, or in this case, the Postal Service. Remember, it is not really so much "fighting City Hall" as it is simply being heard by a disinterested party in order to prevent a federal agency trampling on

the rights of postal customers.

The Postal Regulatory Commission is, indeed, a disinterested third party. It has been said that, if anything, the PRC bends over backwards not to interfere with the Postal Service's management prerogatives in these cases. In fact, the law does not allow the Commission to second-guess postal management's decision to close or consolidate a postal office. The Postal Regulatory Commission may only examine the agency's decision and record, and decide whether the Postal Service has stayed within the guidelines the law has established.

The law requires the Postal Regulatory Commission to approve the Postal Service's decision unless the agency was:

- arbitrary, capricious, indiscreet, or otherwise not in accordance with the law;
- without observance of procedures required by law, or
- unsupported by substantial evidence on the record.

In actuality, the Postal Regulatory Commission may not change the Postal Service's final decision to close or consolidate an office. It can only affirm, or let stand, the agency's decision, or return (remand) for further consideration (i.e., do it right next time).

Despite all the above, the appeals process is very important in bringing to light the actions of Postal Service management and ensuring they follow not only the letter of the law, but the spirit of the law, as well. Once an issue sees the light of day, minds often can be changed. Elected officials and the public can become involved. Efforts to save a post office can be galvanized.

However, unless the appeals process is used, none of these actions can occur. The key is to use the appeals process the way Congress intended. When 92 percent of the post offices are closed without the appeals process being used, the law is not working the way Congress envisioned.

The challenge—especially to retired Postmasters—is to either use, or urge others to use, the appeals process where warranted. If it is not used, there is no chance to save a post office. The result is a loss not only to the community and the Postal Service—which, after all, loses a retail outlet—but to the nation as a whole.

A2011-44

Bernard, Iowa (population 99) and a postal review investigator, basically said it was a very real probability, based on study findings, but that right now the postal department is trying to determine exactly how residents will receive their mail if the post office in fact, closes - cluster boxes she said would be placed at a location yet to be determined; or a box placed at each resident's home.

Cluster boxes (16 boxes per cluster) would be a much more efficient way to conduct the delivering of mail, taking only one minute per box. A rural carrier from the Villisca Post Office would be in charge of delivery. Grant will keep their zip code of 50847. Lindauer assured the people with concerns about the safety of the boxes that they are safe, secure and weather-proof. Those citizens who expressed concerns about the elderly being able to get to the cluster boxes, were told they could obtain a "hardship waiver", but that they would need a doctor's note stating the reason it would not be feasible for the person to go to the boxes. Also, if a person still drives, they would be turned down as a "hardship case".

Ms. Lindauer was asked approximately how many post offices in Iowa are being reviewed for possible closing and she said about 31. She was not at liberty to reveal the locations, but also said about 2,000 post offices nationwide will probably be closed. About 75 percent of all post offices are leased facilities. The post office in Grant is leased from Audie Rainey, a Grant

U.S. Postal Department representative Sara Lindauer tries to explain the reasoning behind the possible closing of Grant Post Office.

resident.

The postal department is redirecting traffic to box stores and grocery stores in many areas. When asked what compensation these stores get, she didn't have any details on that. Not all the post offices being reviewed are in small towns, but in larger towns as well, citing Sioux City and Waterloo as examples.

To maintain the Grant Post Office it has taken about \$18,500 in salary and overhead. The income has been approximately \$9,000 per year. The review consists of revenue and growth versus expenses. It averages 170 pieces of mail coming in which includes "junk" mail. Unlike the feeling we get when we receive all those solicitations (ugh!), she explained that the "junk" mail is actually good income for the post offices. The Grant Post Office has been averaging 12-24 transactions a day. Just not enough business to maintain it. As we all know, email, texting, electronic transfer of fund, e-bill paying, etc. has hurt the postal department.

I called Ms. Lindauer on Thursday to see if a copy of the study done on Grant could be obtained. She said it won't be complete for a month or so, and when it is, could be seen at the website [usps.com/voia/welcome.htm](http://usps.com/voia/welcome.htm)

The feeling these Grant residents expressed was one of still having fight in them to keep their post office, and one of sadness - Several said that they felt the post office has also been a kind of "gathering place" to meet and visit with people they might not otherwise see.

Unfortunately, we live in a society where profits come first, and another piece of a small town hangs in the balance.

*One might wonder - where's the next post office to be targeted for possible closing in SW Iowa?*

Appointments of Postmasters for Grant:

Albert W. Bender - Acting Postmaster 09/21/1935; Postmaster 02/20/1936

Mrs. Mary Redmon - Acting Postmaster 06/15/1945; Postmaster 02/09/1948

Alice J. Shafer - Officer in Charge 06/30/1972

Mrs. Beverly S. Weston - Officer in Charge 06/22/1973

Diane Sue Jacobs - Office in Charge 09/29/2000

Michelle L. Dixon - Postmaster 08/11/2001

Lynn M. Frank - Officer in Charge 01/23/2004; Postmaster 04/12/2008

Laurie S. Petersen - Officer in Charge 07/09/2010 - present

item 3

**Griswold American Office Hours**

**8:00 a.m. - 4:00 p.m. Monday - Thursday**

**8:00 a.m. - 3:00 p.m. Friday**

Griswold, Cass Court



A Little Weather ... Last Thurs. Feb. 24 we received approx. 2.1" of snow beginning in the afternoon, making driving a little treacherous. We then received approx. 1" more on Fri. On Sat. & Sun. we escaped the forecasted sleet

UNITED METHODIST WOMEN  
Griswold • Laurel  
PAGE 12 GRISWOLD

was spared for the time being by a new...

### Post office closures in Iowa

The United States Postal Service is considering closing dozens of post offices around Iowa this year, primarily in smaller towns, as part of a cost-saving effort to eliminate 2,000 offices nationwide. Post offices in the following cities are among those that face possible closure (or already have been closed):



complete with homemade bars and cookies baked by Swartz and other townsfolk. Meetings will be held Monday night in both Geneva and Udell and March 14 in Searsboro.

The Hawkeye District includes our entire state, except for the 515 and 516 ZIP codes in southwest Iowa that are served by the Central Plains District based in Omaha. Hawkeye also embraces Illinois' 612 ZIP code in the Quad Cities.

It wasn't until about 50 minutes into the meeting in Grant that Lindauer revealed she's not just an investigator but also a small-town postmaster in Bernard, Ia., who could be faced with similar cutbacks or closure.

"I'm just trying to keep the post office alive," she said to the crowd.

Residents were concerned about safety as well as convenience. What about all their medication deliveries? John Giefing, for instance, told me before the meeting that he takes "a handful in the morning and a handful at night" for his heart, arthritis and blood pressure — regular shipments from the Veterans Administration.

Elderly residents can plead hardship cases for home delivery, but that status typically isn't granted if the person has a valid driver's license, officials said.

Post offices in small towns usually are replaced with CBUs — "cluster box units" that stand outdoors and are accessible 24 hours a day.

The Postal Service does love its acronyms. An OIC is an "officer in charge," which some small-town post offices have been staffed with in lieu of postmasters.

Linda Sulsberger has been the OIC for 16 years in Rodney, Ia., which she says helped the Postal Service avoid paying her costlier benefits and, ultimately, might make it easier to close her post office.

afraid to talk for fear of their jobs. Remember that this is a department that has shed 200,000 workers in the last decade, 100,000 of them in just the last three years.

**At the post office in Mingo, I stumbled on Sondra Kenney, the city clerk, last week as she was distributing copies of a save-the-post-office petition around town. Mayor Gary Bartels and the city went so far as to buy the post office building and negotiate a more generous lease (\$8,000 a year) in an ultimately successful bid to keep the post office open.**

When I followed Kenney to the Heartland Co-op down the street, employee Jason Jameson was the youngest man in the room among the morning coffee circle of older farmers who were lamenting the "one more thing gone" kick to the gut of small-town post office closure.

"I can't remember the last time I bought a stamp," Jameson admitted.

"I don't like the idea of going to Colfax," Darrel Noe said while picking up his mail. "That's 16 miles round trip, with the high price of gas."

"This small town doesn't have much to it," added Deb Jackson, also picking up mail. "We're losing our dignity."

Dignity is a good word to describe the emotions fueling this debate among small-town residents.

Mingo had been feeling a bit better about itself: The new U.S. Census figures showed population growth in Mingo (from 269 to 302 residents), probably aided by its status as a bedroom community on the northeast fringe of the Des Moines metro.

Southwest of Des Moines in Madison County, Patterson is trying to spur home construction in a new subdivision as it faces potential post office closure.

But Grant, in Montgomery County, is more distant from a major metro and arguably has even more at stake.

"If they wait 10 years, the population may be cut in half by then," Robert Molnar said in a disgusted tone at the town meeting.

Is the future of some of these towns similar to Ira, the burg just east of Mingo that lost its post office in May 2009? There, the population of wrecked autos in the local salvage yard far outnumbers residents.

"This is a service owned by the American people, and it's supposed to serve them," said state union head Clark. "That should be the goal."

That quote is worth a stamp. Maybe two.

Kyle Munson can be reached at (515) 284-8124 or kmunson@dmreg.com. Connect with him on Facebook (Kyle Munson's Iowa), Twitter (@KyleMunson) and his blog (DesMoinesRegister.com/KyleMunson).

THE REGISTER  
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MELENDEZ/THE REGISTER  
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Lindauer is one of  
Postal Service's three  
ew investigators for  
Hawkeye District.  
dauer has been presid-  
over town meetings,



(From left) Arvid Peterson and Delbert Jenkins pet a baby mallard duck that Red Oak Rehab Activity Director Marcie Olson is holding, last Tuesday during "Pet Therapy," an event put on by Red Oak FFA as part of National FFA Week. (Andrew Nostvick/Red Oak Express)

Nikseresht would like add parking stops to prevent future accidents. No time has been established on whether the building will be fully repaired. "Right now business is running and we have established something temporary and everything is going okay," Nikseresht said.

# POST

item 5

CONTINUED FROM PAGE 1A

notice will be posted in the post office for 30 days, during which residents can appeal.

After that, a closing date is set and a notice is posted 30 days in advance announcing it.

"I understand there is some mixed emotions, probably more negative than positive in this situation, and we are not here to say it will be better, we are not here to say it will be the same," Lindauer said. "What we are here to say is we can still provide delivery and retail service, but it will be different."

The Post Office is proposing to deliver all of Grant's mail to cluster boxes, a collection of centrally located metal boxes.

"We feel it is a superior form of delivery, other than curbside, because you don't have to install it, you don't have to maintain it, and if something goes wrong you call the post office and they will take care of it," Lindauer said.

She also said one advantage

to even curbside mailboxes is each individual box will be locked and accessible only by the person who possesses the key.

"So it's really more safe and secure than individual boxes along the road," she said.

However, many in attendance worried about the impact the closing will have on the community.

Greg Lightner, who moved with his wife to Grant five years ago, said it is one of the few places the community gathers, and that he would not

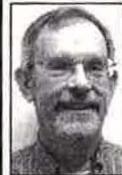
have met many residents if it wasn't there.

"It is one of the community areas we have. I can speak for all of us when I say that is a very important place in town, and if you close it, you will hurt a lot of people," he said.

Grant Mayor Zelda Swartz stated Postal studies indicate small post offices account for less than one percent of their total budget, and asked Lindauer if it wouldn't make more fiscal sense to eliminate some of the reported 200 lawyers employed full-time.

"Probably," Lindauer

responded. "And I have asked why are we looking at these little towns when it's going to affect the economy much as the bigger ones. [if you are having economic hard times as an individual you start cutting wherever you can. You grab at every opportunity, and that's what we are doing. We are grabbing at everything.]"



**Home Health & Hospice of the W**

Pastor Paul Ward

Hospice care is focus providing comfort to with the decline and actual death of the client first thing we think regarding comfort is issues, but the spiritual comfort during this time just as important. client doesn't have a they feel comfortable the Hospice Spiritual Counselor is available offer that support. Spiritual Counselor the client where they spiritually to ensure personal experience inclusion of scripture and prayer plus another dimension in for the whole person



**Kiwanis Club of Red Oak  
Chicken & Biscuit Supper**

**Tuesday, March 8, 2011**

**5:00 - 7:00 pm**

Red Oak High School Cafeteria

Adults - \$6 Children under 12 - \$4  
3 and under free

Tickets available at  
BP Station Berggren Jewelry Bank Iowa



**The Red Oak Chamber and Industry Association  
Presents**

## Ladies Night Out

**"Diamonds are a Girls Best Friend"**

Monday, March 7th Red Coach Inn and Restaurant

5:00 pm The Diamond Social Hour featuring Berggren Jewelry and Premier Designs Jewelry

6:00 pm Buffet Dinner featuring Princess Chicken and Pork Tenderloin

7:00 pm Funny Bone Comedians - Heather Jones and Austin Anderson

Tickets: \$25.00 in advance • \$28.00 per person at the door • \$187.00 for a Table of 8  
Tables of 8 must be reserved by contacting the Red Oak Chamber and Industry Association at 712.623.4821.

Individual tickets can be purchased at Berggren Jewelry, Hip Clips & Nails, The Pudgy Pumpkin Patch Gift Shop, and the Association office. Tickets can also be purchased at the Red Oak Rehab & Care Center between 8:00 am and 4:00 pm.

For additional information please contact Red Oak Chamber and Industry Association at 712.623.4821.

**Heartland Health & Hospice of the W**

**Montgomery Memorial H**

712-623-7

item 6

# NEWS

TUESDAY, FEBRUARY 22, 2011

## POST

CONTINUED FROM PAGE 1A

I feel, very unhandy for everyone."

Other residents worry about the accessibility of the cluster boxes.

"We have no public transportation in Grant," Laurenda Mifflin said. "How are the elderly and disabled supposed to get their mail in sub-zero temperatures without killing themselves?"

USPS Spokesperson Richard Watkins said changes in how Americans communicate is forcing the post office to change the way it operates.

"There is an added sense of urgency because of our financial situation," he said. "We aren't tax supported, so we have to get the most bang for the buck. We simply have to become more efficient."

With the proliferation of

emails, and online-bill paying, mail volume is at its lowest levels since the 1960s nationwide.

In Grant, a recent review revealed an average of less than a dozen window transactions per day at the post office.

Watkins stressed regardless of what decision is made, the post office will continue to meet the mail delivery need of Grant residents.

"We understand there is a sentiment among many of our rural customers and the attachment our customers have with one particular post office," Watkins said. "And if we end up closing the Grant post office, we will continue to serve those customers."

Residents will have a chance to voice their opinions and concerns in a meeting with

USPS officials Wednesday at 6:30 p.m. in the Methodist Church.

However, they have already formally voiced their opposition to the cluster box proposal in a letter to U.S. Congressman Steve King and Sen. Charles Grassley.

"... the Postal Service's proposal to close the Grant Post Office will reduce mail service to your constituents," the letter states. "Moreover ... we will lose our community identity and the consolidation would have dramatic impact on our community's economy."

Should the post office in Grant close, mail would be processed through the Villisca Post Office, 17 miles away. Elliott would offer the closest post office at 10 miles away.





**Federal Trade Commission**  
**Protecting America's Consumers**

item 7

For Release: January 16, 2008

**FTC Releases Report Examining Laws That Apply Differently to the U.S. Postal Service and its Private Competitors**

**Study Required by Postal Accountability and Enhancement Act of 2006**

The Federal Trade Commission today issued a report entitled "Accounting for Laws that Apply Differently to the United States Postal Service and its Private Competitors," which fulfills its requirement under the Postal Accountability and Enhancement Act (PAEA).

The report identifies and quantifies – to the extent possible – the Postal Service's economic burdens and advantages that exist due to its status as a federal government entity, as well as those benefits resulting from its postal and mailbox monopolies. The report also examines the net economic effect of the relevant laws governing the Postal Service and its private competitors, concluding that the USPS's burdens and benefits both create marketplace distortions: legal constraints increase the USPS's costs, disadvantaging it as a competitor; implicit subsidies that the USPS enjoys partially mask the USPS's higher costs from consumers, creating incentives for consumers to purchase more competitive mail products from the USPS than they otherwise would. The report further explores ways that the Postal Regulatory Commission (PRC) or Congress may be able to minimize or eliminate such distortions.

**Report Conclusions**

The report's conclusions are based on comments received in response to a Federal Register notice announcing the study; the Commission's consultations with the USPS, other governmental agencies, and private parties; and a review of relevant publicly available material. They include the following:

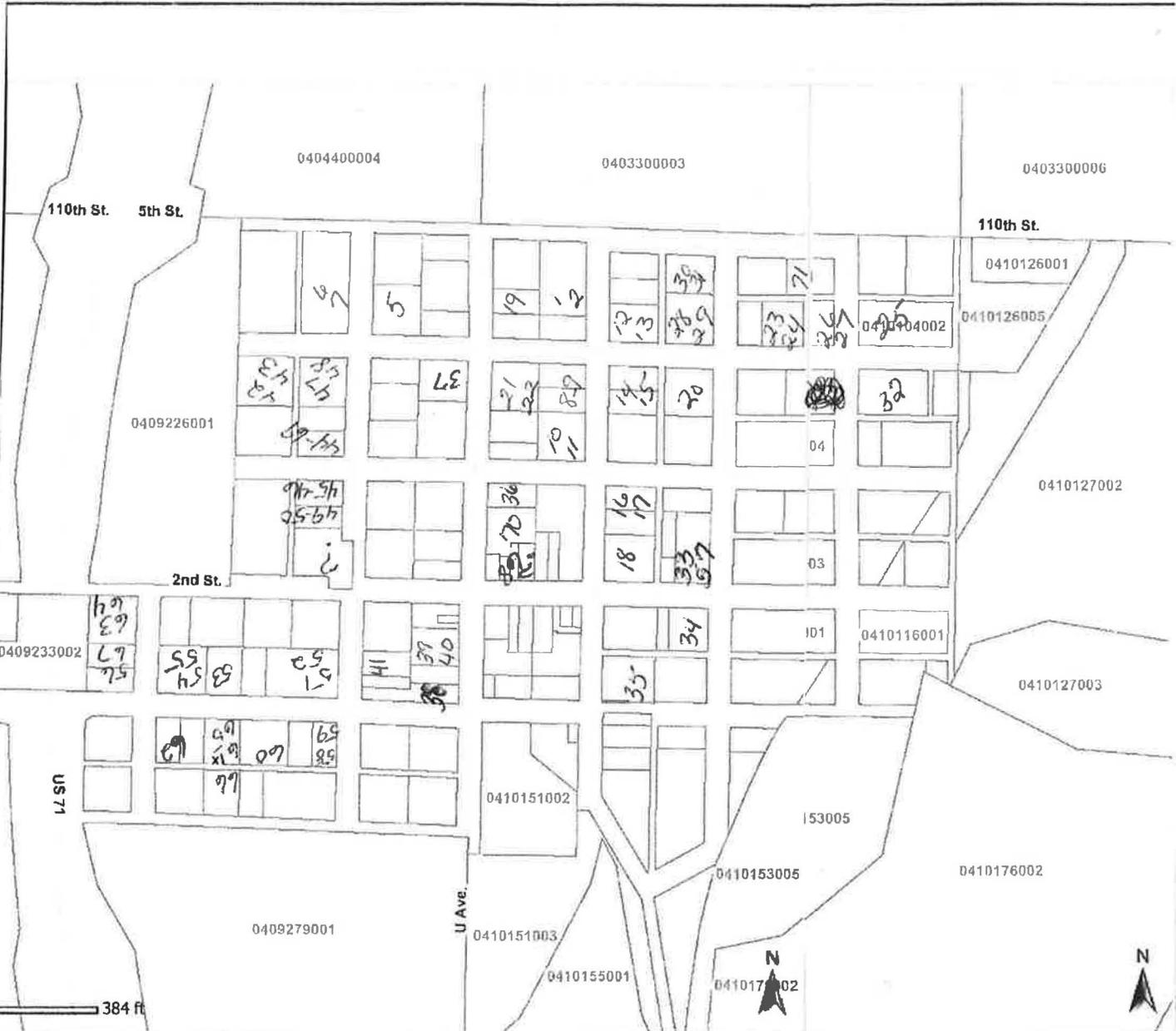
From the USPS's perspective, its unique legal status likely provides it with a net competitive disadvantage versus private carriers:

Federally imposed restraints on the USPS's operations increase its costs to provide competitive products by an estimated \$330-\$782 million a year.

However, because the USPS is a federal government entity, the USPS's competitive products operations enjoy an estimated implicit subsidy of between \$39-\$117 million a year.

From a market-wide perspective, the federally-imposed restrictions that impose economic burdens on the USPS and the implicit subsidies that provide the USPS an economic advantage should be viewed as two distinct distortions that compound each other and negatively affect the provision of competitive mail products: the USPS's legal constraints cause it to use more resources to produce competitive mail products, whereas its legal advantages partially mask these higher costs from consumers, creating incentives for consumers to purchase more competitive mail products from the USPS than they otherwise would. Taken together, these two distortions mean that more resources are used to produce the current volume of competitive mail products than is necessary.

- Congress may wish to consider acting to reduce the constraints on the USPS's competitive products operations.
- At the same time, the PRC may wish to consider requiring the USPS to account for its implicit subsidies when making pricing and production decisions.
- In the longer term, a variety of options exist to eliminate the legal differences between the USPS and its private competitors:
- Congress and the PRC may wish to consider whether relaxing the current mailbox monopoly to allow consumers to choose to have private carriers deliver competitive products to their mailboxes would create net benefits for consumers.
- Congress may wish to consider whether the scope of the postal monopoly could be narrowed to allow greater competition while still maintaining universal service.



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House #	age	house #	age
1.	47	28.	young
2.	50	29.	young
3.	90's	30.	50's
4.	80's	31.	50's
5.	80's	32.	40's
6.	30's	33.	50's
7.	30's	34.	40's
8.	50's	35.	60's
9.	50's	36.	40's
10.	60's	37.	50's
11.	30's	38.	70's
12.	60's	39.	50's
13.	70's	40.	50's
14.	40's	41.	70's
15.	40's	42.	50's
16.	70's	43.	50's
17.	60's	44.	30's
18.	80's	45.	50's
19.	40's	46.	50's
20.	60's	47.	30's
21.	30's	48.	30's
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55.	60's
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63.	60's
64.	70's
65.	50's
66.	20's
67.	30's
68.	Young
69.	70's
70.	30's
71.	50's

This isn't totally complete but close. As you can see, there is more than 1/3 are senior citizens, and over 1/2 are over 50.