Postal Regulatory Commission
Office of the Chief Admin. Officer

SEP 12 2011

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POSTAL REGULATORY COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268

Postal Regulatory Commission
Office of the Chief Admin. Officer
SEP 12 2011

In the Matter of:

Ida, AR 72546
Post Office State ZIP Code

Docket No: A2011-48

Committe To Save Ida Postoffice
Petitioner(s)
Earlene Cannon, Chair

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Ida post office. The Final Determination was posted August 4, 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.

Statement attached; Pages 1-5

The Committee to Save Ida Post Office is appreciative of the opportunity to explain the reasons why we believe that the Postal Service's Final Determination to close Ida post office should be reversed. For that purpose, we offer the following:

1. The effect of closing will be *very* negative for our community. The Ida post office is located 9.4 miles from Heber Springs and that is the office of choice proposed by the study. We estimate that these 18.8 miles on each of six daily round trips would cost approximately $80.00 per month. We base this on the current $3.45 cents per gallon gasoline cost for a vehicle that averaged 20 miles per gallon in fuel use. Additionally, post office box rental at the Heber Springs office costs $12.00 per year more than do those at Ida. In purely economic terms, we submit that this is an extremely adverse effect for all Ida post office box users and especially so for a sizable percentage of retired patrons on quite small fixed incomes.

   The alternative would be for all Ida postal service patrons to have rural carrier service. The impact here would also be one of great adversity. Location of rural boxes for many folk would be a significant distance from their "front door" on secondary gravel roads. To buy a money order, mail a parcel, post accountable mail or do other retail business would require direct contact with the carrier. Since the exact arrival time would not be known, that would involve waiting at the rural box for an indeterminate time in indeterminate weather for his arrival. As we understand the process, this situation could occur. Suppose that a customer wanted to send a $300.00 money order. The customer must meet the carrier to get a form to complete. If the carrier could not wait for the form to be completed, the customer would have to meet him again with a completed form and the $300.00 in *cash* for the carrier to take to the Heber Springs office. On another trip, the carrier brings a money order with only the amount filled in and there must be another meeting or else the money order would be left in the box (if legal or if carrier assumes liability?) and anyone could purloin it and use as cash. The study proposal indicates that a mailbox may be locked, but then mail could not be picked up by the carrier. Even if this process worked conveniently and safely, it would require *three days* for what would take a few minutes at our local post office. Both sending and receiving of accountable mail as well as sending parcels would pose the same problems and these scenarios do not describe a "maximum degree of effective and regular postal service" as is the legal right of rural Americans. Add to those difficulties the consideration that some patrons are elderly, infirm and/or physically handicapped. Also, our retired post master has made us aware that there are Ida postal patrons who use money orders for all bill paying and that some of them need help in reading and writing in order to fill out money orders as well as with other mail. It is unlikely that a carrier would have the time to handle these issues and still get his other duties done in a timely manner. The location of rural boxes for other patrons would abut a very busy State Highway 25 over which traffic is always substantial, greatly increased during tourist season, and now is almost constantly filled with gas exploration vehicles many loaded with gigantic equipment or pulling tankers hauling water to

well sites. For these customers, all of the above problems would exist with the addition of potential bodily injury.

Internet service is scant in our community and that which exists is not particularly reliable or speedy and so we are less reliant on it for business and communication than other places. This represents another adverse impact of the post office being closed.

Another consideration is for those patrons who work at towns 30 or 40 miles from Heber Springs. If they have a post office box there, it could be difficult if not impossible for them to obtain their certified, receipt required or other accountable mail or parcels during Heber Springs post office business hours. They would have the same problem meeting the carrier if they opted for a rural box.

Added monetary expense, *extreme inconvenience*, diminished access to mail, lack of security of mail, and physical danger would all be effects of closing the Ida post office.

Pertinent to us, if not to the USPS, is the historical significance of this post office. In May of this year, our community had a celebration of 120 years of service from this institution. In fact, oral history indicates that our community's name derives from that of the daughter of the first postmaster here. The local post office itself and the ensuing establishment of Rural Free Delivery mail service epitomize the recognition of the needs of rural America as well as of the contributions made by this segment of our country. The economic endeavors of people of this community, like those of thousands of similar ones across the United States are crucial to the basic survival needs of our fellow Americans as their endeavors are to us.

Our identity, our history, our economic endeavors, our place in the larger society will be harmed irrevocably by the removal of Ida post office and our contention is that the postal service did not sufficiently consider the issue of this impact. Support for this contention is offered in point #2 below.

2. The proposal to close was posted at Ida post office on March 17, 2011. This was after a meeting held by three members of the postal service on March 10, 2011. Those dates indicate that only four working days passed between the meeting and the posting. That does not seem to be much time given to due consideration of the input from our community members. In fact, we were left with the feeling that the meeting was only a formality and that determination had been made before the meeting took place. There are several indications that we believe support that feeling. The actual conduct of the meeting appeared to be designed with a USPS bias. Mark Merritt, Jackie Stubitsch, and Patti Robinson were present and Ms. Robinson presided. She began with a rather lengthy biographical statement and then spent a very large proportion of her time talking about the financial plight of the postal service, its organizational viability, and of the

importance of keeping jobs, including hers. The meeting was stopped at least twenty minutes before the posted closing time, and the meeting ended with a lack of clarity regarding several issues. Many attendees indicated that they felt that their concerns were considered insignificant as customers of the postal service. In fact, we have heard reports from audience members who said that their raised hands were ignored and that they were told by the presiding member that, "I have the floor." and that they did not get to ask their question. In addition to what we consider this rather heavy-handed approach in the conduct of the meeting that prevented full participation, we think that those postal service employees did not adequately consider the petition support of almost 400 persons including regular Ida postal patrons and others from surrounding communities who made use of the post office from time to time. Further, we believe that the postal service survey results were misinterpreted or misstated. Comments regarding said survey as well as other points in the proposal to close that are inaccurate will be addressed in the following section.

The Committee To Save Ida Post Office mailed to representatives of the United States Postal Service a copy of the Proposal to Close that had some hand notations highlighting some of those inaccuracies mentioned above. In addition to that , we state our belief that the proposal's inclusion regarding the survey results are wrong. While we have not seen the completed surveys and have no proof of exact numbers or opinions, we would contend that the petition results would belie the idea that only four people opposed the closing. In fact, we *know* that there were more than four members of our committee who certainly expressed opposition via survey.

Other inaccuracies include an under count of the number of attendees, the number of concerns expressed, and even the distance from Ida to Heber Springs. As per the information in point one, the distance is 9.4 miles rather than the 4 miles indicated in the proposal. The proposal contradicts itself by stating that Ida post office has no delivery customers and then stating that "Questionnaires were distributed to delivery customers." The inaccuracy is in the statement regarding no delivery customers. Ida has a delivery route that includes seventy plus customers and has had it for decades. An egregious misstatement in the proposal is that Ida has no businesses (and yet another contradiction states that community people "work in local businesses"). We have two churches and our own firehouse with first responders. Additionally, we have a heavy equipment and gravel trucking business, a fertilizer and lime company, a grocery/hardware/deli, an upholstery shop, two beauty shops, an air-conditioning and heating company, a cross-country trucking business, an RV and boat repair shop, and several cattle, poultry and other farming operations. To this add the fact that Ida is setting in the middle of the Fayetteville Shale natural gas exploration area. In fact, there is a gas well in sight of the post office and there are so many wells in the community that one would have to think and count to get the actual number. They are still drilling. It had brought much prosperity to our area and the gas people say that it will last at least thirty years.

The postal representative presiding at the March 10, meeting could not give any specifics when asked how much saving would accrue from the closing of Ida post office. The proposal, however, did include figures that the committee find to be questionable. We are uncertain as to whether to attribute to inexperienced reporting from the temporary clerk at our post office or to lack of understanding or purposefully slanting from postal study for the statement that "This office earns 1.4 hours per day." Credit for post office boxes, rural route boxes, and revenue should total 143.1 units which is well within the 126 – 335 range for an EAS11 level eight hour day post office. Further, it is inconceivable to members of our committee who have had postal service employment and experience that retail transactions average one minute per transaction and that there an average of nine per day as reported in the study. The "one minute transaction time" was also not a common experience reported by other committee members.

The report misstated the lease cost as $3,000.00 annually instead of the actual $2,250.00. The salary used for the postmaster was the top level of $42,480.00 rather than entry level of $30,492.00 and the study did not account for costs incurred in closing including increased costs of carrier mileage, additional costs at Heber Springs post office etc. Furthermore, the cost analysis did not include any show of Ida Post Office revenue credit.

In March of 2011, our committee sent a letter to the Arkansas District Manager for the USPS in which we asked for answers to some of our questions that came out of the original discussion at the meeting leading to the proposal to close the post office. These questions were not answered as a result of that attempt as they had not been sufficiently answered at the meeting.

The Final Determination to Close was posted at Ida Post Office on August 4, 2011, and despite our strenuous efforts to find answers and point out erroneous information, the posting was almost identical to that on the Proposal to Close. We see this as reinforcing our belief that a true and accurate evaluation was secondary to the predetermined plan to close.

We believe that we have shown that closure of our post office will have a much more negative impact on our community than was indicated by the proposal particularly because the change will not provide a maximum degree of effective and regular service to our rural area. We believe that the postal service did not give due diligence to the study, and in fact, included material of an inaccurate and incomplete nature. Proper procedure would seem to require an accurate and thorough study of the situation, and we contend that it was not done. We are also unconvinced of the economic savings to the postal service and contend that, even if a savings were substantial, it would not be pertinent to closing a rural post office because it is not self-sustaining.

Again, we appreciate the opportunity to be heard and appeal to the commission to send the proposal back to the postal service.