

Comments N2011-1 Retail Access Optimization Initiative
Submitted by Mark Jamison

Commissioners;

You have before you in this case a most fundamental question: What is the future of the United States Postal Service? Taken even in its narrowest context this case discusses big and important issues. Over the last two or three years the Postal Regulatory Commission has accepted its portfolio with grace and diligence. The decisions you have rendered and the work you have done in support of our national postal system has been thorough and thoughtful. Your system of assigning Public Representatives to each case has assured that the only true stakeholders of the USPS, the American people, are well represented..

You have performed diligently and with integrity in the past, the case before you now, in many ways, is at the very heart of what our vision of the Postal Service should be. I implore you to make your decision in this case about first principles. Elements of the statutes that empower you might lead you to look at this case along very narrow lines, limiting yourselves to a determination if there is sufficient justification for large scale closures and if so what appropriate procedures might be applied in the execution of those closures.

Certainly a myopic reading of the context would allow you to weigh this decision against the supposedly dire financial condition of the USPS. Difficult times call for difficult and painful measures we are often told but if that be the case then perhaps the most difficult measure may be the one based on principle and an honest reading of the facts surrounding our current circumstances.

We so often return to the words “binding the nation together”. We do so because they speak to the fundamental wisdom of the Founding Fathers. They understood that a healthy and robust post was an integral part in the physical, commercial, and intellectual infrastructure of the nation. From that first principle, from that grand idea we are able to articulate the essential truth embodied in the concept of the universal service obligation. There is a profound truth in the concept of universal service, there is an understanding that a successful democracy relies on our ability to provide equal access to all our citizens. Further this truth leads us to an understanding of the essential role of government in providing universal, neutral infrastructure which fosters and facilitates growth that benefits all the citizens of the country.

In the last several years we have seen a narrowing and concentration of economic benefit. This trend has coincided with an increasingly cynical attitude towards the role of government. Taken together these developments give lie to the fundamental idea that in our democracy a rising tide should lift all boats. Instead, today, we allow our focus to be directed to short term solutions too often guided by special or limited interests.

The financial challenges that face the Postal Service today are, at heart, manufactured, the result of dysfunctional Congressional oversight and a myopic postal management that seeks at every turn to undermine the very basis for its existence. The postal network we have developed over generations provides not only mail delivery but an essential governmental presence in every community and corner of the nation. This network, which should be viewed as an asset rather than simply as overbuilt industrial

capacity, truly has served to bind the nation together. Dissolving and dismantling this important piece of our national infrastructure would be a tragic mistake.

The financial deficits that confront the USPS are not the result of operations. It is a demonstrable fact that these deficits are essentially a political construction. Yes, declining mail volumes have impacted the Postal Service but this commission found in the exigent rate case that the financial troubles facing the Postal Service were not based on declines in volumes but on structural charges imposed by Congress. The fact that it might not be politically feasible or practical to address the problems created by Congress should not be a consideration here. Neither should the fact that a narrow minded, limited, and disingenuous management has committed itself to a course and vision that can only lead to the dismantling and privatization of an important national asset.

Time after time in filing after filing before this commission the management of the Postal Service has treated its mission of universal service with cynical disrespect. In dealings with employees, communities, and the American public in general the management of the Postal Service has paid disingenuous lip service to the basic principles of service while behaving with high-handed arrogance. This filing is not about providing alternative service, rather combined with other offerings such as the dismantling of the mail processing network and suggestions that we jettison obligations to both employees and communities, this filing is simply about a narrow limited vision of the Postal Service as little more than privatized mailing company.

As the issues confronting the nation's postal system have moved ever to the forefront it is not hyperbole to say that Congress has failed the American people, or that those charged with managing the nation's postal system have failed miserably, or that some of the industries that have benefited from the existence of this essential infrastructure have taken a narrow and completely self-interested view of the problems and potential solutions. Throughout these difficult times two entities have managed to maintain their institutional integrity and act as honest brokers.

Both the PRC and the USPS-OIG have remained true to their defined functions and missions. Both have produced reports, studies and white papers that demonstrate a thoughtful approach which recognizes the essential value of the nation's postal system. Even when confined to commenting on the limited and narrow vision expressed by the system's management both of these institutions have done so in an essentially honest way that often clarifies the cognitive dissonance inherent in postal management's approach to the problems that confront us.

I spent most of my career as a postmaster in a small rural community. I know how important the presence and reach of the postal service can be. What is being offered in exchange for that presence and reach is wholly insufficient. I suppose though that in the face of multi-billion dollar deficits that heart warming stories about the impact the Postal Service and postal employees have on their communities will fall upon deaf ears.

I suppose too that in an age where ideological rigidity trumps evidence or human concerns that it is pointless to offer any viewpoint that doesn't affirm the preferred ideology. And when our business models take into account only short term considerations, exalting immediate profit over long term growth and worshipping cost cutting at the expense of employment and jobs then I suppose that any discussion of the value of the postal network as infrastructure becomes a pointless exercise.

The Postal Service has come before you with a request to fundamentally change the nature of postal services in this country. This case cannot stand alone as a simple argument for a change in the nature of service in the face of financial challenges. It does not exist in a vacuum but must be examined in light of all the other presentments, actions, and plans offered by the Postal Service. Examined in that light this case is nothing less than a request to abandon the concept of universal service.

This case is about first principles, it is about a fundamental understanding of what government is and does. It is about the profound truth inherent in the idea of a national infrastructure that provides universal service and opportunity. It should not be about political expedience or turn on the fact that Congress has imposed reckless and unsustainable burdens on a national treasure.

Throughout its existence the PRC has demonstrated the highest levels of professionalism, honesty and integrity in its processes and decision making. No matter how you choose to approach this case I am certain that you will continue to demonstrate those values. I implore you to grasp the opportunity this case gives you to examine first principles, to make a statement that acknowledges the very foundational place the Founders saw for the post and to sustain the basic profound truth embodied in the principle of universal service.

Ultimately Congress, which created the financial crisis confronting the Postal Service, must find a solution to the present problems. Ultimately Congress, which created a dysfunctional and unaccountable management system, must take responsibility for its failures. Do not let Congress or postal management off the hook by crafting a narrow decision in this case. This case is about first principles, please have the courage to let your decision reflect that.

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