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 POSTAL REGULATORY COMMISSION
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Postal Regulatory Commission
 Office of the Chief Admin. Officer

SEP 23 2011

POSTAL REGULATORY
 COMMISSION
 OFFICE OF THE SECRETARY

re: request for Postal Regulatory Commission review
 DOCKET NUMBER 1362780 - 13062
 POSTING DATE: July 23, 2011:
 FINAL DETERMINATION TO CLOSE THE ETNA POST OFFICE
 AND ESTABLISH SERVICE BY RURAL ROUTE SERVICE

Dear Madam Secretary:

Although USPS has properly followed legal procedures within dictated timeframes, their process has been an exemplary model of minimalism. It appears the decision was pre-determined and USPS is merely "going through the motions" as quickly as possible.

The steps completed which resulted in the Final Determination to close the Etna Post Office are arbitrary because they are based on false, biased and incomplete information. Therefore the decision is not supported by substantial evidence on the record.

Etna box-holders were notified April 25, 2011 that USPS proposed to close the Etna Post Office. The public meeting on May 5, 2011 was scheduled at an inconvenient hour (10 AM), when most Etna postal customers were at work. This time was selected by the OIC, obviously because it was most convenient for her, not Etna postal patrons.

USPS responses to the meeting and questionnaires (Docket 1362780 posted 5/21/11) USPS response to customer concern that the questionnaire was too standardized was "customer opinion has been duly noted in the official record". This response was offensive and used repeatedly in this docket leaving concerns of patrons unanswered. It may as well read "we don't care what you think". The questions were loaded so most responses favored the USPS. Responses to multiple choice questions were limited and often not applicable. **Substantive matters were ignored and information resulting from this questionnaire is arbitrary, inaccurate and biased.**

The Final Determination Docket 1362780-13062 contains incorrect information.

Responses to all questions below were incorrect or left blank:

COMMUNITY SURVEY SHEET Item Nbr 16, Page Nbr 1

Question #4: Are there any special community events to consider?

The Etna Community Association is a non-profit organization that holds numerous events at Houtz Hall (which houses the post office). Included are "Soup 'n' Salad Suppers, Ice Cream Socials, Rummage Sales, Chocolate Fest and Craft Fairs, et al.

Proceeds provide funds for maintenance of the building, the Etna Children's Playground and tennis courts, as well as free Halloween Parties and Easter Egg Hunts for children.

Question #6: Do postal employees offer assistance to senior citizens and handicapped postal patrons?

Based on the testimony of Etna's previous two Postmasters (retired), there are many requests from patrons for assistance (e.g. filling out money orders, parcel requirements, preparation and insurance). I personally needed assistance deciding on the most timely and cost-effective way to send a package to my sister in time for her birthday at the end of August. I am grateful for the personalized assistance I received.

***Question #6: Which non-postal services are provided by the Post Office ?
(e.g. bulletin board, community meeting place)***

Etna Community Association holds their meetings in the same building.

The Post Office vestibule is the Etna information center with two large bulletin boards used by our local church, organizations and businesses. A large easel is also placed there by the Etna Community Association to advertise pending events.

What provisions can be made for these services if the Post Office is discontinued?

There are no other retail or public buildings. The Post Office is our hub and the foot traffic generated by the Post Office is critical to the survival of the Etna Community. The Etna Association has no other place to advertise events and post volunteer sign-ups sheets. The resulting lack of participation would effect our proceeds and thus our ability to maintain our services for the community (maintaining the building, playground, tennis courts, free holiday events for children).

Is the Post Office a historic landmark?

Although not yet on the official NYS landmark list, it is Etna's historic building . The building dates back to 1878 and has become the hub of the community.

FACT SHEET Item Nbr 18, Page Nbr 1

Question #17: Schools, churches and organizations in Service area?

The Etna Community Church neighbors the building in which the Post Office is housed and they even share a common entrance and parking lot! Organizations include Boy Scouts, Sea Scouts, Etna Fire Department, and the Etna Community Association (ECA). The latter is a non-profit organization which holds numerous community events to raise funds which maintain the Etna playground and the Community Center/Houtz Hall. This facility is used by local organizations and for various meetings - as well as being the home of the Etna Post Office. It is the hub of this proud and cohesive community and thrives on the foot-traffic generated by the Etna Post Office.

Question #18: Businesses in service area?

There are numerous businesses, organizations and cottage industries regularly using the Etna Post Office: Boy Scouts, Sea Scouts, Academic Books Source, Phoenix Books, Tompkins Weekly and Ithaca Child Newspaper circulars, Rith Pottery, Autoworks, Cornell University, Wildtree Herbs, Hawkeye's Herbs, Tabby Bookkeeping, CNY Landscaping, Etna Fire Department, Etna Community Association, J. Lowery Beverage Distributing Company, Lowe Welding, If Only Farm, et al.

POST OFFICE SURVEY SHEET Item Nbr 15, Page Nbr 1-2

Will time of mail delivery be effected?

Mail is ready for pick-up the Etna Post Office at 9:30 am. Freeville and Ithaca Post Offices window hours are different from Etna's. (It should also be noted that many of the businesses in our service area depend on this timely delivery so they can schedule their workdays effectively.)

Are box fees the same at alternate sites?

Fees at the Freeville Post Office are the same. However many current Etna postal patrons are located on the rural route serviced by the Ithaca Post Office. Also the numerous Etna businesses may opt for boxes at the Ithaca Post Office (vs. Freeville or rural delivery options) where hours of accessibility and timeliness of deliveries are more favorable for their needs. Ithaca Post Office box fees are considerably higher.

Although research supports that it is illegal to close our post office only for financial reasons, it is obviously the reason. However, financial disclosures are confusing and conflicting. The cost of providing rural delivery to some effected Etna patrons appear to be missing from the analysis.

These substantial omissions from the record present a biased and inaccurate financial statement:

The bottom-line figures in the Docket posted 07/22/2011 quote annual replacement service cost as \$4,597 and annual savings as \$48,452. The posting on 8/23/2011 indicates replacement cost at \$23,713 and savings as \$29,336. These are based on an annual operating cost of \$53,049.

Then I reviewed the documentation in the book at the Etna Post Office and was further confused by information located in:

HIGHWAY CONTRACT ROUTE ESTIMATED COST
for REPLACEMENT SERVICES ItemNbr17, Page Nbr 2

Number of addition boxes to be added to route: 28
Number of additional miles to be added to route: 1.0
Total annual cost for replacement service: \$4596.60

How do the 156 rental boxes at the Etna Post Office equal 28 rural boxes?

The explanation is these figures are specified for the **Albany District PFC only** (The Freeville Post Office only.)

Many Etna postal patrons reside in the rural route serviced by the Ithaca Post Office. This leads me to assume the other 128 postal rental box customers are NOT included in the **Freeville Post Office** (Albany District) rural service area, but the **Ithaca Post Office** service area! Therefore, these 128 boxes **are not included** in the annual replacement cost of \$4596. When I divide \$4596 by 28 boxes, the annual cost per box stated above is \$164. 128 additional boxes with an annual replacement cost of \$164 each equals \$20,992. When added to the replacement cost for the 28 boxes, the **annual replacement cost for 156 boxes is \$25,558 NOT \$4596.** (This uses the 1.0 additional mile factor that is also likely underestimated.) Based on the operating cost of the Etna Post Office of \$53,049 the savings is \$27,461. \$48,452 is incorrect.

There are also several patrons who reside on Main Street/State Rte 366 who currently have free boxes at the Etna Post Office because there is no rural delivery available to them. There is no provision mentioned in the proposed Freeville rural route for mail delivery to these residences.

The Docket posted on 5/21/2011 states office receipts for the Etna Post Office were: \$79,126 in 2008; \$76,557 in 2009; \$68,146 in 2010. I do not have an accounting degree, but when an operating cost of \$53,049 is subtracted from any one of these receipts, I come up with a black figure, not red.

The 2010 figure was likely influenced by the retirement of our Postmaster in July 2010. She has never been replaced, and interim USPS employees (one was not even an OIC) lacked her professionalism, as well as her dedication to the Etna Post Office and the community . I feel this is reflected in the bottom line for 2010.

When B. VanDusen (retired in 2010) was postmaster, she had received a “most improved award” from the Albany district. It seems significant that of 75 similar facilities in the Albany district, only four were profitable with Etna being the first of those four. It is difficult to understand how the Etna Post Office went from award-winning to closing in such a short period of time. Etna was a self-sustaining location and likely has the potential to be again if properly managed.

It seems USPS has created it’s own losing situation at the Etna Post Office by not replacing the retired Postmaster. The USPS’ response for this is that there is a hiring freeze for management. This does not mean there is a lack of qualified personnel currently employed by USPS. **The vacant Postmaster positions have been recently filled at Cortland and Groton Post Offices by internal transfers.**

It is mandatory for the post office to address the effect on the community.
Substantial information has been either omitted or not satisfactorily addressed in the final determination:

It appears that USPS is ignorant about not only demography of Etna but also the geography. Etna is divided by USPS into Freeville and Ithaca rural routes which are two separate districts. I am a resident of Fall Creek Parke on Lower Creek road in Etna. This road is serviced by Ithaca, not Freeville. The owner-landlord does not permit individual mail boxes on our streets within this mobile home park. This will not change if the Etna Post Office closes. Park residents currently rent Etna post office boxes and would be required to change their box locations to Freeville or Ithaca (which would be a six or twelve mile round trip). There are 36 homes in this park accessed by Lower Creek Road. The private homes on this same road currently receive rural delivery from the Ithaca Post Office, so I assume the mobile home park would also be assigned to Ithaca. We have received no information from the Ithaca Post Office on how they propose to deliver our mail. Some residents of the park (and of Etna) rely on local public transportation, do not own personal vehicles, and walk to the Etna Post Office.

The USPS solution to maintain identity was keeping the Etna Zip Code! Would the Etna zip code be available to NEW postal patrons who move into the Etna area or will they be forced to use Freeville or Ithaca? If not, Etna and the 13062 zip code will eventually become extinct by attrition. Our cohesive hamlet that has existed for hundreds of years will literally disappear!

In conclusion, it does not appear that USPS has presented us (as required) with a workable plan to provide a maximum degree of regular postal services to our community of Etna. The proposed plan is based on bias, erroneous and incomplete information, ignorance about the geography and demography of the community, and lack of knowledge of customer needs.

The FINAL DETERMINATION TO CLOSE THE ETNA, NY POST OFFICE AND ESTABLISH RURAL ROUTE SERVICE (DOCKET NUMBER 1362780 - 13062) is arbitrary as it is based on false, biased and incomplete information.

Therefore the decision is not supported by substantial evidence on the record. I request a review by the Postal Regulatory Commission of all processes completed to date.

Respectfully,



Sharon J. Searles

Post Office box-holder at Etna Post Office
Proud resident of Etna, NY
Member of Etna Community Association Board of Directors