

Bentonville, Ohio
September 29, 2011

Appeal for the closing of the Bentonville, Ohio Post Office (A2011-58)

Additional comments to the original ones cited in the filing of the appeal for the closing of the Bentonville, Ohio Post Office.

1. Two major issues stated on the proposal to close the post office were the facts that the Bentonville Post Office had no restroom or running water and was on a yearly lease. Mrs. Verna Naylor passed away on July 6, 2010, and her children inherited the house where the post office is located. The Post Office Survey sheet said that the post office was on a yearly lease. **At no time since that date has anyone from the postal system contacted the family concerning this lease. We do not have a copy of it, to know what was included in the original lease.** (According to Item #18 Page 1 the Lease expired on 6/30/11). A monthly check of \$125.00 is still being sent to our home addressed to Verna Naylor.

Another fact is the concern of no restroom or running water. (Docket 1354710 - Page 15 #1 of the questionnaire references the lack of running water or restrooms (if so, where restrooms are available). There was no answer given. **This fact has not been addressed in over 63 years. It's strange that it would be so important at the time when the Postal System wants to close the post office. Also there has not been a health inspection of the building citing this issue as a citation. Postal employees use the bathroom in the house. There has been no communication issued from the postal system asking the owners to install a restroom in the facility.**

The facts is the Postal Service's final determination are true, but they do not prove what the Postal Service says they prove.

The facts relied on by the Postal Service have not been established.

2. The information given on (Page 15a) question #2 of the Post Office Survey Sheet states: What equipment in the Post Office is not owned by the Postal Service? The answer said collection box, small office supplies. This is not true. Equipment owned by the postal system include: **2 sets of scales, 1 money order machine, the scanner set-up, a fax machine, and an outside collection box, and postal forms, etc.** There are also 2 new items that have never been used considering the fact that they are for a computer and the Bentonville office is a non-computer office. These items were received around the first of 2011. To this date, no one has ever responded to the fact of where they came

from, who ordered them, and what to do with them.

Harry Naylor purchased the antique post office boxes in 1948, and these post office boxes are personal property of the family, other personal property includes the antique safe and antique clocks.

The facts relied on by the Postal Service have not been established.

3. On the Community Survey Sheet (page 16 #4) states: The town is the home of the Oldest Postmaster and Oldest Postal Employee in the United States. (This section of Page 16 could have included: The Bentonville Post Office has been in existence for over 169 years. It did not include the information of the Anti-Horse Thief Society which was established in 1853. It is still in existence today, and an annual banquet is held. The Bentonville Harvest Festival is also an annual event. This year's theme was 35 Years of Memories and all of the past grand marshals were honored which included Mrs. Verna Naylor as the first one in 1995. Also PMRs' James and Harriett Naylor were grand marshals in 2005. The national headquarters for the 101 Airborne Division was also located here for a few years. (1990's) (not sure of the exact date).

The Postal Service did not consider certain issues it is required to consider.

4. (Page 15) Is the facility accessible to persons with disabilities? The comment was checked that the Post Office was not handicapped accessible. Pictures show that parking space is available in front of the post office. People drive right beside the outside box and drop in letters. One can easily enter the post office. If a person does not wish to exit the car, he/she can toot the horn and the PMR will give assistance. An elevator is located at the side of the house. Pictures included in the docket substantiate these facts.

The facts relied on by the Postal Service have not been established.

5. One statement says that the position of the PMR will be eliminated --is questioned-- because James Naylor PMR, was a sub mail driver in the 1960s'. He is also a union member. In a different place in the docket, it is stated that the PMR will have the option of working at other local offices if needed.

The savings stating this salary and fringe benefits on the proposal are questioned. (Docket#1354701 page 29 second page) One example is below (Proposal to Close Post Office)

Postmaster Salary (EAS-55-No COLA)	\$24,584
Fringe Benefits @ 33.5%	8,571

Rental Costs, Excluding Utilities	_____ + 1,500
Total Annual Costs	\$35,655
Less Annual Cost of Replacement Service	_____ - 1,521
Total Annual Savings	_____ \$34,134

According to this statement, the only cost for service for Bentonville residents will be \$1,521. How can the route be run on \$1500+ per year? This says that the PMR will not have a job or not be paid, and the other employees doing the work will not be paid. This expense is for the delivery of mail on the route only. Using this figure a rural carrier will be receiving approximately \$5.00 per day if figured on a 300 day delivery schedule. This is unreasonable considering that gas is now between \$3.00 and \$4.00 a gallon.

(Page 17a) of the docket states that there will be 15 boxes added to the route with a cost of \$1523.23. Total annual cost for alternate service (annual cost minus lock pouch allowance.) Figures on different pages are conflicting.

Note: Presently, the expenses for the Bentonville Post Office include PMR's salary, rent of \$1500.00 per year and approximately \$100.00 per year for the telephone bill, fax cartridges and required postal forms. How does this compare to the figures being presented by the Postal System?

The facts relied on by the Postal Service have not been established.

6. Mr. Redden brought the proposals, and told the PMR to post them on the wall and to place the document in the safe. Upon reading the docket at the post office and finding some questionable answers, **I discovered it was possible to purchase a copy of the docket. This information is also noted on (Item 3 page 1) concerning the request for getting a record of the document, 3/16/2011.** Mr. Redden was called on Aug. 30 and two copies of the dockets were requested. He said he would call back with the cost. On September 2, Mr. Redden called and told the PMR that he had learned of the appeal and to repost the papers. Again he was asked about this docket. He later called and said that the cost was \$25.00 each and said he was going on vacation and could have them to the post office by September 20. **As of this date, the docket has never arrived. This delay in sending the docket has put a time constraint on collecting information favorable in keeping the Bentonville Post Office open.**

The Postal Service did not follow the procedure required by law.

7. The proposal to close the Bentonville Post Office (Item 33 page 2) stated that

Bentonville would become part of the Manchester route and that Bentonville would have to use the Manchester, Ohio zip code. I sent Maps of the town with the Manchester and West Union routes outlined, and suggestions of how the routes could easily be changed and allow Bentonville to gain back it's previously owned territory which had been overtaken by the two routes. These maps should be considered and specifically referred to for purposes of showing the more distant location of Bentonville from the Manchester Post Office facility. This suggestion would give less responsibility to the rural carriers and still allow the town to keep its post office open.

This suggestion was ignored in the response of my letter. Also in checking the docket you can see that these maps were an enclosure and were omitted (Item 38 page 30c and 30d).

The Postal Service did not follow the procedure required by law.

The Postal Service did not consider certain issues it is required to consider.

Also included was a copy of a memorial card of Randy Thacker who was killed in a car accident at nighttime on 2/28/2010. No one knows the true facts, but it is believed that he was trying to do something at the mailbox when his truck became stuck in the snow surrounding the mailbox. He was hit by an oncoming car and his leg was decapitated. He died shortly thereafter. The rural route boxes are placed very close to the highway.

There are many other issues and questions that are unanswered, questionable and conflicting. Some of these include:

(Page 15a) States that the route will add 15 boxes and 2 miles
There will be an additional annual cost of \$1521
Delivery time will be approximately 12:30

This is not better service than we have with the Mail Driver arriving with mail at approximately 8:30 A.M. and mail being dispatched at 5:00 P.M. that evening.

(Item 33 Page 2) states-The Postal Service is proposing to close the Bentonville Oh Post Office and provide delivery mail and mail services by rural route service under the administrative responsibility of the Manchester Post Office, located 5 miles away. It also states that: Service needs in the community have declined and the alternate services provided by the Post Office would provide as good or better service to the community.

(Item 33 Page 6) states that it will cost around an additional \$1500 to add 2 miles

(Item 33 Page 9) States the disadvantages such as Loss of retail outlet and Postmaster's Position in the community

Can meet the rural carrier to conduct business

The facts is the Postal Service's final determination are true, but they do not prove what the Postal Service says they prove.

Change in mailing address --Keep the name but have a carrier route assign and change the zip code. **How can you keep the name of a town and use a different zip code? The residents of Bentonville want to keep their 45105 zip code.**

The Federal Register, July 2011 says town names and zip codes may be maintained.

The Postal Service did not consider certain issues it is required to consider.

The Postal Service did not follow the procedure required by law.

(Item 33 page 9) Change of post office fees if one gets a box in Manchester. It also states that the zip code will change.

(Item 33 page 12 The Final proposal VI. Summary) states: This is the final determination to close the Bentonville, OH Post office and provide delivery and retail services by rural route service under the administrative responsibility of the Manchester Post Office, located five miles away.

It seems that meetings have been held between the personnel of the Manchester and W. U. offices of which they were deciding which town would get some of the rural boxes. A West Union rural carrier came and requested a list of the post office box holders. She said the West Union Postmaster sent her. These were not given to her.

On two occasions, a West Union rural driver has stopped at a lady's house asking where she got her mail and when she was going to erect a new box. This family has owned a Bentonville box for over 50 years. Evidently, the decision has already been made to close the post office before the appeal is completed.

If mail is to be delivered by the Manchester carriers, why are West Union carriers asking these questions?

The customers of the Bentonville Post Office have obviously been

misled. This is specifically contrary to the representations always made by the Postal Service in the proposal before the Commission. The very fact that West Union rural carriers are considering some portion of the Bentonville Post Office area rather than the Manchester Post Office is evidence of the fact that the rural area around Bentonville, Ohio is not better served by either of the other Post Office locations. Again, as the maps do show, Bentonville's isolated location makes the existence of the historical post office in the town of Bentonville most appropriate to provide for the efficient delivery of the mail and other postal services.

The Postal Service did not follow the procedure required by law.

The Postal Service did not consider certain issues it is required to consider.

8. (Item 22 page 44 & 45) In my letter written on 2/19/2011 concerning the closing of the Bentonville Post Office, I sent several items and articles in relation to the historical significance of the town and also of the Post Office. Included in these items was a card with a 1976 bicentennial penny attached which listed historical facts. These pennies were given as a souvenir from Mrs. Verna Naylor, Postmaster. **This card is missing from the docket. This letter also contained information concerning a special honor that Mrs. Verna Naylor received, when a postal union representative came and made a video recognizing her as the oldest postmaster in the U. S. This video was to be placed in the Smithsonian Institution in Washington D. C.**

The Postal Service did not follow the procedure required by law.

The Postal Service did not consider certain issues it is required to consider.

9. (Item 22 Page 59) Letter from PMR James Naylor giving information concerning the amount of bad checks written to Postal System. One specific comment was concerning the collection of fees and money. This comment was not addressed on (Page 64) of the questionnaire.

In the concern and response pages of the final proposal a concern was: Why does the post office accept bad checks. --- The postal system's response: The post office doesn't accept bad checks. People write bad checks when they buy products. When the bank notifies the

Post Office the check is bad is when we know it's bad. When a bad check is received the postal service has a list of bad checks received and the checks are added to the list for postal employees to watch for and no longer accept checks from that customer. The postal system representative ignored the reference to the fact that it is losing thousands of dollars in this area. The problem could easily be solved by 1. Not accepting checks and 2. Placing machines in offices to immediately tell whether or not there is sufficient funds for the purchase. These suggestions were given to Mr. Redden at the town meeting.

The Postal Service did not consider certain issues it is required to consider.

10. At least two people have told me that their questions were not acknowledged on their comment forms.

The Postal Service did not consider certain issues it is required to consider.

11. Any person reading the pages containing information with concerns and responses can easily discover that the responses are identical and repeated over and over. Many times they are vague and don't directly address the issue. At other times the responses are made over and over to support the Postal System's decision to close the office. For example: A concern could be-- the disadvantage of not being able to purchase stamps at the post office. A response will say-- All one has to do is put the money in the box and the rural carrier will leave the stamps either that day or the next.

A concern involved leaving money in the mailbox. The response was: A questionnaire was sent to the postal inspection service concerning mail theft and vandalism in the area. Their records indicate that there has not been any report of mail theft or vandalism in the area. However, customers may place a note in their mailboxes instructing the carrier to sound their horn when they arrive, in order to transact financial business.

How many rural customers are aware that thief and vandalism should be reported to the postal inspection service? Did the postal system representative contact the county sheriff's office to see if there were any reports of this nature? What is considered "the area"? What dates were considered in this questionnaire?

At the town meeting Mr. Redden was informed of an incident several years ago when a Manchester sub carrier failed to deliver mail. The postal inspectors were aware of the situation but did not have the evidence. Mrs. Verna Naylor found the mail in a black garbage bag beside the steps of the house, a few feet away from the post office. The sub carrier admitted that she had placed the mail at that location.

Times are changing. On September 21, 2011, PMR James Naylor happened to see a lady across the street around the mail truck. It was discovered that 2 people had attempted to steal a copper antique washing machine in broad daylight. Luckily they

were caught and taken to jail. Drugs and a weapon were also discovered. A couple of weeks before, a metal push cart was stolen from the premises where the Post Office is located. Thief may not have been an issue before, but it is a big concern at the present time. This issue is of great concern to the residents if they have to erect rural boxes. If I have to erect a rural box, I will not put money in it; therefore, it will make it necessary for me to go to another post office to purchase stamps. This will be an additional expense to me.

Another example may be a concern about lost or stolen mail. The response says- Customers may place a lock on their mailboxes. The mailbox must have a slot large enough to accommodate the customer's normal daily mail volume. The Postal Service does not open mailboxes which are locked and does not accept keys for this purpose. **Does this mean that if a person has mail in a locked box, then it will never be picked up by a rural carrier? In other words, if the postal customer wants to be sure that the mail is safe and mailed; it means a trip to the post office 5 miles away.**

The Postal Service did not consider certain issues it is required to consider.

The facts relied on by the Postal Service have not been established.

The facts is the Postal Service's final determination are true, but they do not prove what the Postal Service says they prove.

(Item 38 page 3a) concern of dangerous highway and safety of people getting mail. Also concern of mail coming in the morning and leaving in the evening at the post office. (Page 3) Response stated Mail boxes must be placed so that they may be safely and conveniently served by the carrier. The other response referenced the fact that carriers strive to provide service at approximately the same time on a daily basis. **Responses didn't address the issue of danger to the people or to the time of receiving mail at the post office.**

(Item 38 page 4a) Concern of bad weather and not being able to afford someone to clear snow away. (Page 4) Response referenced carrier's vehicle with necessary equipment to perform duties. Not customer's concern of snow around the mailbox.

(Item 38 page 5a) Concern of putting others out of work (Page 5) Response -The OIC is a non career employee who was hired with the understanding the position would be temporary. The OIC will be separated from the Postal Service when the office is discontinued. **Question--If the PMR has been a sub carrier since the 1960's and is a union member can this happen? The PMR worked while the late Mrs. Verna**

Naylor was on sick leave, and continued in that capacity after her death.

The Postal Service did not consider certain issues it is required to consider.

There are conflicting statements of what will happen to the OIC.

The vacancy position for a new postmaster at the Bentonville Post Office was never posted.

The Postal Service did not follow the procedure required by law.

(Item 38 page 6a) Concern -If there is no Post Office there won't be a mail drop box-- Have to travel 4 to 5 miles out of way just to mail something. (Page 6) Response: Collection of mail will be made by carrier serving the route. It didn't address the issue. **Note: Many people use the outside drop box service day and night and don't live on the rural route. Others living on the route use the box to mail letters because the mail will be dispatched at 5:00 P.M.**

The Postal service did not consider certain issues it is required to consider.

(Item 38 Page 16a) Customer had a question about cost of paying Manchester employee and Bentonville person losing job. Question- Will Manchester employees get paid for all of the extra work, or will they get extra work added on to their jobs without pay? (Page 16) Response--Postal System employee did not answer question.

(Item 38 Page 17a) Customer asked question of what time will I get my mail? (Page 17) Response -Carriers strive to provide service at approximately same time on a daily basis. Question wasn't answered, but (Page 15A #3.f.) Stated -At what time of the day does the carrier begin delivery to the community? Answer 12:30 This is not the maximum degree of service that the Bentonville Post Office provides.

The Postal Service did not consider certain issues it is required to consider.

(Item 38 page 19a) the customer expressed several concerns--Mail comes early and leaves late, senior citizens, have to erect box. etc. (Page 19) Response references some on rural route will receive mail early and some late. You can use alternative services. Place lock on mailbox-Not required to put up mail box--Customer may apply to receive Post Office Box service from administrative Post Office location or another location that is more convenient. Some of the responses are just options that a customer has in receiving mail.

(Item 38 Page 21c) Customer asked -Couldn't the money that is being spent on T.V. commercials telling everyone that the postal system doesn't charge a fuel surcharge, be more wisely spent? Who is paying for the T.V. and radio commercials? (Page 21) Response didn't address the question.

(Item 38 Page 23a) Customer made the remark- the people who live in town should have to use Bentonville Post Office. Question -How many other towns has 3 options to receive there mail? (Page 23) No response to these questions.

(Item 38 Page 25a) Customer made comment about people from other areas using the outside box. Another comment concerned the rural area of raising food. (Page 25) No response to comments--only responses to support their plan to close post offices.

(Item 41 page 2) I. Responsiveness to community needs states; If this proposal is implemented, delivery and retail services will be provided by the Manchester Post Office- Window hours 08:30-17:00 Monday-Friday--08:30-12:00 Saturday. These hours are conflicting. (Customer wrote that the Manchester Post Office is closed when she gets off work at 1:30 P.M.-(Item 29 page 5)-----Another customer commented that the Manchester Post Office is closed 1-2 P.M. every day (Item 29 page 39)

(Item 41 Page 5) Concern: Customers were concerned about loss of employment in the community. (Page 6) response of OIC will be separated from the Postal Service when the office is discontinued.

(Item 41 Page 7) Concern#45 Why accept checks-Response--Checks are a way that customers can pay for the item they need and not all checks are bad. Every company incurs these types of issues?

Is this remark in reference to the amount of bad checks the post offices receive and who is accountable for the losses?

The Postal Service did not consider certain issues it is required to consider.

The facts is the Postal Service's final determination are true, but they do not prove what the Postal Service says they prove.

(Item 41 Page 12) Effect on Employees--The non career postmaster relief (PMR) may be separated from the Postal Service.

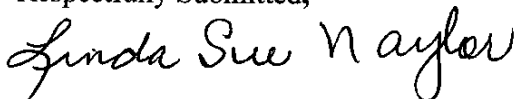
#14 Concern: Customer was concerned about later delivery of mail. Postal Response -- when the price of gasoline goes up one cent per gallon our total gasoline cost rises more than \$1million. **No reference was made to what happens when gas prices go down.**

VI Summary--Postmaster passed away on July 06, 2010. If the office has a non career PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee (s) to a nearby facility. (Partial answer).

Additional comment: On September 29, 2011 the Bentonville Mail Truck Driver told the PMR that Mr. Layman owner of McIntosh Trucking asked him if he could find a parking place for the mail truck in Manchester. The driver informed Mr. Layman that wasn't his responsibility. This shows Manchester is not prepared for the mail truck, and the possible added cost of a parking location. There was no cost for parking the mail truck in Bentonville.

Cost savings alone is not a sufficient reason to relocate a beneficial post office location given that the law requires the Post Office to support areas regardless of the economic viability of doing so, and in the case of the proposal for the Bentonville Post Office, the Postal Service's recommendation simply suggested the current employee of the Bentonville Post Office may be relocated. This is not even cost savings. And there are no considerations of the less restrictive alternatives to closing the office with adjustments to times of operation, limiting other over-expansion of West Union or Manchester delivery areas such that original Bentonville customers should continue to use Bentonville (a potential significant cost savings in both of the rural delivery costs of the other locations) and similar alternatives. The only consideration of cost savings was the closure of Bentonville without any indication the Postal Service considered less restrictive alternatives.

Respectfully Submitted,

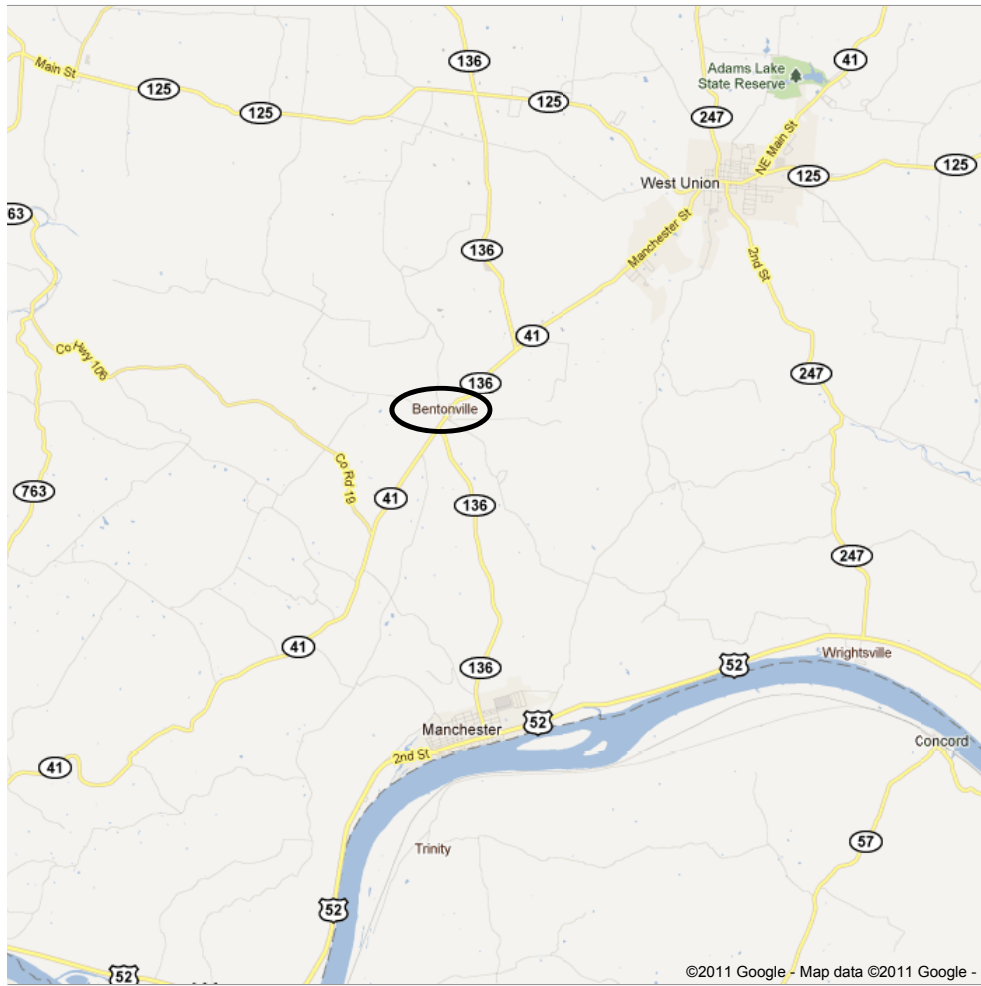


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