

Docket A2011-34
Innis, Louisiana 70747

**Reply Brief in Response to Answering
Briefs**

**United States Postal Service Comments
Regarding Appeal**

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

<i>In the Matter of:</i>	:	Docket No. A2011-34
Innis, Louisiana	:	
Post Office	:	Reply Brief in Response to
Innis, Louisiana	:	Answering Brief
	:	

(October 3, 2011)

Secretary and Members of the U.S. Postal Regulatory Commission,

Ladies and Gentlemen:

I hereby, respectfully submit the following reply brief in response to comments made by Mr. Anthony Alverno, Chief Counsel, Global Business, and Mr. Matthew Connolly, both attorneys for the United States Postal Service. Mr. Alverno and Mr. Connolly fail to recognize several basic premises that we have previously presented. We stand firm, and file this plea to respectfully request that the U.S. Postal Regulatory Commission set aside and not affirm the Final Determination of the United States Postal Service to close the Innis Post Office and establish service by community Post Office and that any such determination shall be reversed and returned to the Postal Service for further consideration.

This consolidating and merger is different than other docket appeals in that three post offices are relocated to the only town eleven miles in either direction from any other town. In essence, the possibility of over \$100,000.00 could be saved annually, if not more. In addition, the post office would be located where it should be, in a recognized town; not at a cross road or moved to a

proposed facility in a daiquiri bar, beer and liquor convenience store miles away from the town.

(See photos in brief exhibits)

Key Points not mentioned or considered by Mr. Alverno and Mr. Connolly:

- No mention or discussion was ever given to the proposal plan of January 27, 2011 to the US Postal Service (The US Postal Service Comments never mention it.) *Return Letter or correspondence to petitioner by any means of delivery never received, and or signed as confirmation of receipt in answer to the proposal plan of January 27, 2011 by the US Postal Service.
- The Economic Savings. This is the number one reason that we suggested the consolidation and merger plan in the letter of January 27 to the U S Postal Service. Efficiency and cost savings. There are three Post Offices on the same highway in an eight mile stretch of highway 1.
- No mention of why the US Postal System has not recognized the economic savings of closure of two adjacent facilities rurally located.
- No mention anywhere of the photographs in the brief of the pictorial description depictive the town of Innis and the two other rural highway locations of Post Offices. These photos factually describe what was said in the letter of January 27, and at the town hall meeting and the petition and briefs. Lettsworth and Batchelor simply can not be called a community by the US Postal Service, because they are not. No answer or statement given as to why the US Postal Service would want to continue to push for a facility in a beer, daiquiri bar and liquor store miles away from the town. (It is right for kids to be around alcohol at a public federal facility?)

- There are many statements that are incorrect as counsel would try to pick apart the petition and brief. The Administrative Record contains incorrect data. We pointed this out in the briefs. The US Postal Service posted the administrative record August 10th, corrected it August 12th, and again corrected it September 19th.
- In the last correction, there are statements made are contrary to the minutes taken at the meeting February 16th town hall meeting and actual facts.

It would be futile to be repetitive of the facts already given to the U.S. Postal Regulatory Commission in the appeal, petition and brief for review of the Final determination to close the Innis, Louisiana 70747 Post Office. As we appreciate counsel reviewing background based on the Administrative Record, there is some incorrect data and inconsistent information contained in this document. As we also appreciate that the Louisiana District US Postal Service is located in New Orleans and that some of this data was gathered by casual employees, as there is no postmaster at any of the three facilities, we have noted and commented in the brief of these inconsistencies. As one can appreciate living in the town being evaluated in this administrative record, one can clearly distinguish incorrect data and inconsistent information.

At only a cost savings of \$35, 800 estimated to close the Innis location, why would consideration continue not to be given to a more financially lucrative plan that offers alternative cost savings of over 2.5 times by merger of three post offices to one in the unincorporated town of Innis? Since the posting of the brief, Innis now has broken ground on a new library and the parish sheriff will build a new hazardous material unit station here in the community.

In the comments from US Postal Service, September 19, 2011 page three, information is quoted from the final determination and administrative record. Temporary employees are serving at all locations, not just at Innis as stated, and Batchelor is a cross road. It is not understandable

why quote services rendered at this location will never help the town of Innis or this cross road to become a town. Why does the US Postal Service not recognize that a mistake was made by having a facility located at a beer and daiquiri bar and liquor store? * *(The postal service knew they were dealing with a small community of highly uneducated people. Although they may have met their requirements, they did not fulfill good communication with the people, and that people of the area did not understand what was occurring due to limited education, poverty, etc.)* Page three discusses the postmaster being reassigned and a temporary officer, casual being in charge. But, the administrative record does not state that it took one week and five out of town high level postal employees to de-commission and relieve the inadequate postal employee who was the root of problems for three plus years. This occurred in the fall of 2009. Take a look at the falling revenue of 2008, 2009, and 2010 and one can determine that loyal customers took their business elsewhere's. There were over two dozen people that complained about the inadequate employee, only to have the complaints fall on deaf ears with the Louisiana District taking no action regarding the complaints or act on these actions by a postal employee. Counsel states on page three that the Batchelor post office lobby is accessible 24 hours, but all lobbies are accessible 24 hours. If a photograph were taken at this beer, and daiquiri bar and liquor convenience store at or after dark, one would quickly understand what we have been concerned with this location as a post office. Page three of the comments again speaks of low growth and minimal impact from the administrative record. This is false data. We have a growing community. *See Exhibits – photos from the brief, and Reply Brief. This can be confirmed from our parish tax records and 2010 censuses figures. We have a 0.2% gain in population from year 2000. We also have persons below poverty level at 18.5%.

In the comments from US Postal Service, September 19, 2011 page four counsel recaps the letters sent by the US Postal Service to postal patrons. However, as shown in the exhibits in the brief one can see that there was never an indication that the "Postal Service was considering

consolidating the Innis Post Office with the Batchelor Post Office” as counsel indicates. Again, on page four, counsel speaks to the community meeting. In review of the exhibit with the town hall meeting minutes, one can find out exactly what transpired at this meeting.

In the comments from US Postal Service, September 19, 2011 page five and six as counsel recaps the docket, Counsel concludes that the determination to close the Innis Post office should be affirmed! “The Postal Service also gave consideration to these and other issues.”

Please review the plan sent to the US Postal Service January 27, 2011, the town hall minutes, the appeal and petition, brief. This statement is far from accurate! Counsel has an opinionated view and has not reviewed the facts we presented.

In the comments from US Postal Service, September 19, 2011 page seven counsel recaps the services, no cost comparisons of other comparable units in Pointe Coupee parish or other parishes were made by the US Postal Service and given to this petitioner or given as promised for the postal patrons who asked for this data at the town hall meeting. We have not been provided data for comparison. See the town hall minutes. Counsel indicates on page eight that all petitioners’ concerns have been considered and addressed. This petitioner, nor anyone else on our committee or any of the postal patrons ever received any correspondence from the US Postal Service which addresses concerns and or the proposal for a more comprehensive plan that offers greater savings to the US Postal Service. Also, the US Postal Service failed to disclose why it continues to maintain that two Post Offices (Batchelor and Lettsworth) that are stand alone buildings for miles are not slated for merger or closure. They are located at cross roads in the middle of nowhere. See photographs with the brief. Innis is a beautiful town. Contrary to counsel’s assertions “has shown growth in the last three years”, Innis is growing and thriving. Counsel’s assertions of petitioner’s comments as suggestive tagged as vague, unwarranted and immaterial are only speculation by counsel. We invite counsel to our town and the two facilities

that should be merged to Innis for a better understanding than the photographs attached in the brief exhibits and Reply Brief.

In the comments from US Postal Service, September 19, 2011 page nine and ten, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination. Again, there are many facts and figures that are inaccurate and this data has not been confirmed by visit to the town of Innis or other confirmation means. The comments made in the final determination are templates used in numbers of final determinations of other pending post office closures. The facts do not warrant counsel recommending and confirming the Louisiana District New Orleans to place a town's mail at a cross road in a confirmed facility located at a Daiquiri, beer, and liquor convenience store. (How could this have happened in the first place?) (Second paragraph page ten) [Batchelor is not a town.] Counsel further indicates (bottom of page ten) "there is no evidence for this claim in the record, moreover the Postal Service considered whether the community was expected to grow in the future and found that that no population, residential, commercial, or business growth was expected to occur." How were these facts obtained? And how was this information confirmed? This is false data and statements! (Again, why in the last year has a new comprehensive fire station, new library, expanding medical facility with doctors, dentist and other family services been located in Innis?) We have new business expecting to locate in the Innis community. The brief has exhibits and photos which focus on these points. The administrative record omits businesses, does not list churches and has a number of discrepancies. There is no evidence of the accuracy of the data contained in the administrative record provided to the Louisiana District from retaining temporary employees that spend little time in the three post offices of Lettsworth, Batchelor and Innis. All of these part time employees are from out of the region, not familiar with the communities and live else-where's. some have resided 60 plus miles from the community. Counsel concurs with the postal officials who completed the survey. If the time or circumstance would be afforded, we shall prove the New

Orleans postal officials wrong. The information of the postal official is wrong on businesses and growth. This petitioner has lived in Innis since 1959 and will go under oath for questioning pertaining to information of fact in the Administrative Record. Counsel finds immaterial statements (window service) by the Petitioner and the fact that window service was ordered has nothing to do with poor results on a given week. Instead, a chart should have been developed and disseminated for our review with records week by week of window service for all postal facilities with less than 300 postal patrons in Pointe Coupee parish for any given week for comparison. Statistical analysis was not completed, and Innis was singled for elimination without any thought of consequences to the town. However there seems to be no issue or objection to having a postal facility at a cross road in a confirmed facility located at a Daiquiri, beer, and liquor convenience store, and another postal facility located in a soy bean field! Isn't this very strange? The data in the administrative record is not convincing and not compared to any data for similar facilities.

In the comments from US Postal Service, September 19, 2011 page twelve, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination. Again, the Community Post Office concept at the Batchelor postal unit would not be in a town, but at a cross road. Batchelor is not a community by any definition. Postal Officials never state this fact and never state that the postal facility is located at a cross road in a facility containing a confirmed Daiquiri bar, beer and liquor convenience store. It might be pointed out that counsel recaps the savings of \$35, 804.00. Would anyone think that such an insignificant financial savings and a great sacrifice of time to prepare an appeal to the Postal Regulatory Commission for maintaining the postal facility in Innis is the intent of this appeal, petition and brief? This petition is about doing what is right for the town and the people who live and work in the community. The US Postal Service will not give answers even with our US Congressional members demanding answers and applauding this petition, why our plan does not make better sense of space, time and money, for a much more significant savings. It has totally been ignored

and swept under the rug by the US Postal Service. Why? It is apparent that counsel did not carefully review the plan submitted to the US Postal Service and the Louisiana Congressional Delegation January 27, 2011 and concurs with a federal US postal facility being promoted and located in a confirmed facility located at a Daiquiri bar, beer, and liquor convenience store. The US Postal Service Louisiana District Discontinuance Coordinator, Alfred Christophe, never presented this and other pertinent facts regarding the Batchelor location, to include items presented by Alfred Christophe in - {Memorandum to file PRC docket A2011-34} Consolidation of the three postal facilities to Innis were never even considered and brushed off.

In the comments from US Postal Service, September 19, 2011 page thirteen and fourteen, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination regarding the Rural Route. "Additionally, there is a rural route that emanates from the Batchelor Post Office that currently provides delivery and retail services to the Innis, Batchelor and Lettsworth communities". This statement is incorrect by counsel and also by Alfred Christophe. There is a rural route at Batchelor and another rural route at Lettsworth. As previously stated in the petition and brief, both of these routes were allowed to encroach the town of Innis over the years, yielding less revenue for Innis. There are over 64 rural boxes in the town of Innis. The petitioners (at least 100) who signed the petition do not want rural boxes. Take a look at the letters and comments sent to the PRC. Counsel in the next sentence indicated that there is no additional cost for routes. The same holds true when the post office is one office located in the town of Innis.

Counsel continues why petitioner questions cost, savings and asserts that petitioner provides no citation to authority to support the claim. We requested numerous times information and financial data, comparisons, etc. from the US Postal officials at the town hall meeting, by phone or email and received nothing to support the merit of the consolidation of the three postal units. The rationale of elimination of one unit in a town versus elimination of two postal units

located at sign post on Louisiana Highway #1 is not thinkable or a prudent business decision.

There are not career slot employees or postmasters at any of the three facilities. Counsel suggests that a career slot will be eliminated. Why not eliminate two slots and two postal facilities? The area does not warrant three post offices within 8 miles in a rural area.

In the comments from US Postal Service, September 19, 2011 page fifteen, counsel continues to recap statements from the Administrative Record. Counsel also quotes from the final determination. Counsel takes exception and concludes that the allegations by the petitioner in reference to the inept, incompetent, dysfunctional postal employee caused a reduction in business at the Innis post office. We do not know why the US Postal Service did not come forward and mention this in any of the records. Depose all postal patrons who live in Innis and you will learn about this employee. Many complaints were called in to the US Postal Service and no action was taken. In 2009, the postal employee was dismissed, of which the US Postal Service should be able to provide the record. There is no mention in the Administrative Record that it took one week and five upper management postal employees to de-commission and relieve the postal employee who caused issues for three or more years. This was done in the fall of 2009.

Further more, counsel concurs with the US Postal Service economic savings of \$35,804.00. This is a mistake! To consolidate all three post offices to Innis and devise a working plan for mail arrival in Innis and routed out to the Upper Pointe Coupee Community could save over \$100,000.00. If a postal service truck from Baton Rouge travels 11 miles a day round trip from Innis to Lettsworth and averages 10 miles per gallon, savings alone at average gas rate of \$3.25 per gallon would be \$936.00 In these discussions, there is much objection to the plan of January 27, 2011 presented to the US Postal Service there is not even a mention that, "we will make this work for the population and or we need to consider where the town is located, as well as what businesses and people live and work in this town. To arbitrarily place a facility and mail in a location that is not a conducive locale due to heavy truck congestion and sales of alcoholic

beverages at the multi purpose Batchelor convenience store is not appropriate or a sound business decision. We invite anyone to visit this area and really take the time to observe facts, not what is written on paper to justify the existence of the Batchelor & Lettsworth locations and not the Innis post office location.

In the comments from US Postal Service, September 19, 2011 page sixteen, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination. The question on closure of the Innis post office is why the plan was presented to the US Postal officials. Did the US Postal Service ever consider a more efficient and cost effective proposal? Part of this reasoning by the US Postal Service, I would suspect, is that looking at the declining figures of the last three years due to poor service of the postal employee was the only focus. The bigger issue of these same US Postal officials is not understanding the geographic area that composes northern Pointe Coupee Parish, bordered by rivers and the Morganza spillway from the rest of the parish. It does not make any sense why the US Postal Service would reject the alternative proposal for merger and consolidate to Innis. For some reason, the Louisiana District continues to have the belief that the Innis Post Office cannot handle the mail for the area. This is incorrect. There is additional space for mail box customers and enough room to sort route mail for two routes. Is there anyone who can convince the Louisiana District to consolidate to one post office in a town? In the petition the 100 or more people who signed the petition do not want to travel to a facility located at a confirmed Daiquiri bar, beer, and liquor convenience store. The post office in Batchelor is located in this building. In the comments from US Postal Service, September 19, 2011 page seventeen, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination. It should be pointed out that title 39 and applicable regulations need to be applied to Batchelor and the Lettsworth locations. The daiquiri bar, beer, and liquor convenience store also have heavy truck traffic as pointed out in the letters and brief. Read the background in the plan presented to

the US Postal Service and the petition, brief and exhibits to understand that even if the Postal Service is not required to evaluate and/or reject alternative proposals, it should in any sense of compassion for a town that is growing and not declining, put forth its best effort to be good corporate federal citizens and help the town to grow, shouldn't they consider what is most cost effective for down stream savings and what is considered a prudent business practice? As counsel points out that PRC does not have the right to return a Final Determination for further consideration, then as a commission there is not much point in any patron of any US Post Office to appeal to PRC.

In the comments from US Postal Service, September 19, 2011 page eighteen, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination that the alternative proposal was addressed and explanation provided. An official document (letters) was sent to the US Postal Service by this Petitioner and copied to the Louisiana Congressional Delegation. It was an expectation that a written letter from the US Postal Service would be sent in return, indicating the merit, likes, dislikes and go forward plan to help this underserved community. The reply letter from the US Postal Service was never received. The 100 petitioners do not ask for a new post office and for no additional amenities, only to make the merger occur for a greater economic savings and to enhance the town of Innis. In fact, everyone in the town of Innis is really disappointed that the US Postal Service concluded that the closure of Innis was emanate and that the decision, to move operations to Batchelor with no consideration for people, place or what is best for the area, was ever convened with anyone from the town of Innis.

Counsel quotes petitioners language in reference to the notice sent out by the US Postal Service on the January 24th questionnaire form sent to postal patrons and develops an answer to the notice in defense of the US Postal Service. If one attended the town hall meeting, the US Postal Service did not live up to the spirit of the notice. The Postal Service addressed the participants of the meeting that the Innis mail would be coming to Batchelor. The town hall

meeting minutes reflect the nature of business. A plan for replacement services advising postal patrons that they would be serviced by rural service is not the American way. Many of the elderly did not want and currently do not want rural service. *See the letters to PCR.

Counsel quotes and states that the feasibility of the Petitioners alternative proposal was discussed at the community meeting February 16, 2011. The correct facts are that I, the petitioner, had to beg Gernarda Bailey to present the plan at the end of the meeting in the last few minutes of 1.5 hour discussion by US Postal Officials. US Postal Officials did not advise this petitioner of anything. All who were present at the meeting were told that US Postal officials would look into the plan. Gernarda Bailey, Manager, Post Office Operations had not copied any officials on this plan. See exhibits and email to the Customer Service Representative for Louisiana District. We presented the plan with the photos. All the community participants of Innis who attended the meeting were in support of the plan. Look at the town hall meeting minutes! No feasibility discussion or determination, and no communication, verbally, written by letter, fax or email nor face to face meeting or conference call was ever held to consider, explain or just talk about the proposal. What Counsel quotes are not accurate facts. The town hall minutes reflect the actual questions and later questions from the US Postal Service that were never received and answered for the people who attended the town hall meeting. Only templates in the Final Determination to close the Innis Post Office - that can be found in the many dockets at the PRC website; all have the same language which fits the same questions.

In the comments from US Postal Service, September 19, 2011 page nineteen and twenty, counsel continues to recap the statements from the Administrative Record. Counsel also quotes from the final determination. Counsel thinks that all questions were answered by the US Postal Service and that petitioner's observations are not material. We never received the financial information requested of the US Postal Service at the town hall meeting, the PO Box count for the other units and no comparisons to other post offices of similar size in Pointe Coupee parish as

requested. One can not determine anything based on lack of information and figures. The US Postal Service has not been forth coming in this entire process with correct facts concerning the three postal units of Lettsworth, Batchelor, and Innis. Seven rural postal units were listed in the brief. We have no information on any of these units which would have been useful information in the understanding of cost and expense. The submissions that routes were not included in cost because there are routes at other post offices does not make the case for cost of operation of additional customers should they choose route delivery.

In the comments from US Postal Service, September 19, 2011 page twenty, counsel concludes that there is was proper procedure and consideration on the effect of closing the Innis Post Office, as well as the economic savings from the closing that is consistent with mandates. There are many flaws in the way that the US Postal Service handled the entire procedure from the start as reflected in the appeal, petition, brief and exhibits. In this reply, brief points have been made about the inconsistencies, errors and inaccuracies of facts in the Administrative Record and the Final Determination to close the Innis post office. Counsel concludes that "the Postal Service determined that the advantages of discontinuance outweigh the disadvantages". This is further than the proper outcome. Counsel is not familiar with the implication of such a decision that impacts the current and future residence and business in the town of Innis. The two rural post offices of Lettsworth and Batchelor are not indicative of the worth of a post office serving citizens and businesses in a recognized town. The Postal Regulatory Commission members have to be considerate and value the concepts of sound prudent decisions as conclusions based on internal intent and misinformation can and does lead to closure. We affirm that Mr. Anthony Alverno and Mr. Matthew Connolly are not residents of the rural area and that the two postal locations of Lettsworth and Batchelor should be merged and consolidated and relocated in Innis. Again, neither of these two cross roads, Lettsworth and Batchelor are a town a community or a respectable village. In consideration of the economic savings of \$31,804.00 to close a post office

in a recognized town is more important to the US Postal Service than the economic savings of \$71,000.00 to \$100,000.00 by consolidation of all three units, then I would suggest that counsel would need to visit our town for several weeks to affirm their legal views of this rural area. As I read the entire comments there was never mention of the January 27th letter to the US Postal Service which has the proposed plan for consideration or the exhibits with the photographs and other backup information and reflections in the letters and comments of the postal customers from Innis. The US Postal Service nor counsel mentioned any views, background or any information on these two post offices four miles each direction from Innis. The entire area can only support one post office.

From the United States Postal Service Notice of Filing Memorandum To Clarify The Administrative Record - Errata, September 19, 2011 by Alfred G. Christophe III, Operation Programs Specialist, Operations Program Support, and Discontinuance Coordinator for the Louisian District in the Memorandum to file PRC Docket No. A2001-34, In the memorandum from Alfred G. Christophe III, he states in point #1 and #2 he states that people were told instead of a proposal to close the Innis post office that services would be provided by the "Batchelor Post Office located in the community encompassed by the Pointe Coupee Parish". ??? Why would the US Postal Service submit an Administrative Record in ERROR that had to be corrected two times after original submission? Many of the people who signed the petition indicated that the Postal Service idea of a community post office at 70715 Batchelor in a Daiquiri bar, beer, and liquor convenience store was not what they wanted. They want to go to a post office, in the town of Innis, not to a sign post at Batchelor. They were all very concerned about parking situation, traffic hazards and very congested area, due to 18 wheelers with farm grains and plastic pile at the two local businesses, after hours parking from five pm and weekends due to the nature of this business, and the burden of driving four miles to a Post Office. In its Final Determination to close the Innis Post Office, the

Postal Service failed to provide an accurate record of the concerns expressed by community residents; it did not state relevant facts completely or interpret them correctly, while including some factually incorrect assertions, and it failed to demonstrate the economic non-viability of the Innis location or show how closing this location would improve the Postal Service financial position.

(The Correction done September 19, 2011 by Mr. Christophe - Administrative Record)

Regarding Mr. Christophe's memo about the ability for Innis to handle both Batchelor's and Lettsworth's boxes, Mr. Christophe's third point doesn't "have a leg to stand on". To refute his point "An investigation has been made and it has been determined that there is sufficient space in the existing Innis PO to accommodate both the Batchelor and Lettsworth PO boxes". Further, I would like to suggest a visit by all who are reviewing this docket and Mr. Christophe to the Batchelor, Innis, Lettsworth area so anyone can see the reality of the situation. A visit would be worth a thousand words (or more), especially in this case!!! One could then see the mailbox space availability, the new library, sheriff's office plans, etc. At least Alfred Christophe wouldn't be so prone to write "anti-Innis" memos after such a visit. After re-reading Mr. Christophe's comments, I thought I would pass along a couple of mine. Fundamentally, I believe he misses the basic point of cost savings by closing two Post Offices and keeping one!

In point #3 by Alfred Christophe, he states that the feasibility of the Petitioners alternative proposal was discussed at the community meeting February 16, 2011. This did happen in the last few minutes of an hour and one half discussion by US Postal Officials by this Petitioner in short form. Alfred Christophe and other postal officials did not advise this petitioner of anything as mentioned in his memorandum. All who were present at the meeting were told that US Postal officials would look into the plan. Gernarda Bailey, Manager, Post Office Operations had not copied any officials on this plan. See exhibits and email to the Customer Service Representative for Louisiana District. The correct facts are that I had to beg Gernarda Bailey to present the plan at the end of the meeting with the photos and the community support of the plan. Look at the

meeting minutes! No feasibility and no communicating, verbally, written by letter, fax or email nor face to face meeting or conference call was ever held to consider, explain or just talk about the proposal. What Counsel quotes are not accurate facts. The town hall minutes to reflect the actual questions and later questions from the US Postal Service that were never received by the people who attended the town hall meeting. Alfred Christophe failed to read the appeal and petition that the petitioners who signed the petition and the petitioner did not ask for a new postal facility after understanding that nationally the US Postal Service was in deep in trouble financially, but to only transfer all services from Lettsworth and Batchelor post office to the Innis post office. This deletes two hypothetical postmaster positions, cost of trucking mail, utilities, rent, upkeep and other maintenance cost. In a study done by our committee, we found out that postal units of similar size elsewhere can accommodate from 100 to 200 additional PO boxes. This is only a mechanical process to install additional boxes. As I read the entire comments by Alfred Christophe, there was never mention of the January 27th letter to the US Postal Service which has the proposed plan for consideration or the exhibits with the photographs and other backup information and reflections in the letters and comments of the postal customers from Innis. The US Postal Service did not mention nor counsel any views, background or any information on these two post offices four miles each direction from Innis. The entire area can only support one post office. The petitioner, committee members, or any of the postal patrons never received any correspondence from the US Postal Service which addresses concerns and or the proposal for a more comprehensive plan that offers greater savings to the US Postal Service. Also, the US Postal Service failed to tell anyone why it continues to maintain that two Post Offices' (Batchelor and Lettsworth) that are the only structures, for miles around are not slated for merger or closure. They are at cross roads in the middle of no where.

Point #4 by Alfred Christophe states that delivery and retail services will be provided by the Batchelor Post Office. "Currently, there is a rural route that emanates from the Batchelor Post

Office that currently provides delivery and retail services to the Innis, Batchelor and Lettsworth communities". This statement is incorrect by Alfred Christophe! There is one rural route at Batchelor and one another rural route at Lettsworth. Both of these routes are separate routes which begin and end at each the Lettsworth and Batchelor post offices independently. As previously stated in the petition and brief, both of these routes were allowed to pursue the town of Innis over the years, yielding less revenue for Innis. There are over 64 rural boxes in the town of Innis. The petitioners (at least 100) who signed the petition do not want rural boxes. Take a look at the letters and comments sent to PRC. Alfred Christophe in the next sentence indicated that there is no additional cost for routes. The same holds true when the routes are from the post office located in Innis, the one town in the area as in the "community encompassed by the Pointe Coupee Parish". However, depending on the number of carriers that do handle the RFD routes at Batchelor, and Lettsworth, there could be considerable savings accrued if Batchelor and Lettsworth were to be closed in favor of keeping Innis with routes "emanating" from Innis.

Mr. Alfred Christophe's purpose in writing the memorandum "is to clarify how the Postal Service described and customers understand certain information contained in the Administrative Record (AR)". I don't have any idea why he would bother to write a memo to that effect, other than "window dressing" or to provide a diversion from the crux of the real issue.

First, (and this addresses both of his first two points in the memo), what's the big deal about a "community post office"? Who cares about a community post office being established? I don't know of anyone who has formally protested the establishment of a community post office at Innis-- other than rumors I heard that someone from the Post Office had contacted a local store owner. Beyond that, the establishment of a community post office at Innis is not the main issue as far as I am concerned, so I don't know why he is so "wrought up" about a community post office.

In summary, in my opinion, Mr. Christophe could have chosen several other items to discuss in his memorandum that would have made more economic sense to the situation and

would have presented the Innis consolidation scenario in a more positive light. Aside from his point about the number of boxes at each location and whether or not Innis could accommodate more boxes, his memo did very little to expand on a more sensible solution to the problem while, at the same time, created a lot of irrelevant 'smoke' to cloud the issue with rather picayune, insignificant points.

As mentioned at the outset, the purpose of his memo was to "clarify how the PO described" and "how the customers understand", etc. what is mentioned in the AR. He could have gone much further with his memo, in my opinion, in particular, about what the customers understand. Yet, he selectively chose to talk about only irrelevant tidbits of information while omitting comments about the validity of the recommendation to close both the Batchelor and Lettsworth PO's and leave Innis open. He should address that basic premise.

Conclusion

The postal service knew they were dealing with a small community of highly uneducated people. Although they may have met their requirements, they did not fulfill good communication with the people, and that people of the area did not understand what was happening due to limited education, poverty, etc. The postal service could have made a better attempt to word their actions in a manner which the common folk could understand and indeed try to make the situation and economic impact better by really taking an interest in the people and the area as a whole to be considered and the one town that people go to church, buy groceries and congregate, or go to the doctor, dentist, library and or to do other business in town. This action by the US Postal Service to close Innis Post Office at best failed to prove that the plan presented by the US Postal Service is riddled with errors, inconsistencies, and some false data.

Also, due to the incompetent employee who was involved in thieving, citizens of the community are concerned with at home services. This is one the post office brought upon

itself. There were over two dozen people that complained about that bad employee, and the Postal system did not act on the complaints.

Fundamentally, the counsel for the US Postal Service seems to hide behind the law/ regulations when it comes to their not doing what should and needs to be done--viz-a-viz, studying the closing of both Batchelor and Lettsworth PO's--then using the law/ regulations when in their favorable to their cause.

With regard to counsel's document, I have no way of referencing the document(s) that are referred to within their treatise. For example, just to mention one instance, they say at one point that something I said in my briefs and in the intervention comments is "immaterial"! I have no idea what they are referencing. In order to refute what they are referencing, I would need more information regarding exactly what is "immaterial". There are several more such references made throughout their document (referring to other rules, regulations, comments, etc.) that we (I) have no knowledge what they are referencing.

As a matter of fact, the essence of my brief and the intervention comments was to recommend that consideration be given to closing Batchelor and Lettsworth Post Offices; to keep the Innis Post Office open and conducting a cost study and comparison to similar post offices to show that that is the proper thing to do. So, I really don't understand what is "immaterial" about that. In short, it seems to me that we have been subjected to a lot of "bureaucratic mumbo-jumbo", as I would describe it, making references to 'phantom' rules and regulations known only to those within the realm of the Postal Service bureaucracy and camouflaging the real crux of the matter.

I would also suggest emphasizing the fact that the general populace (us) is at a distinct disadvantage in competing with the bureaucracy when we have no practical means or venue for knowing all the rules and regulations associated with the USPS/ PRC, etc. and their processes when it comes to making decisions. Also we have not been afforded financial data of similar postal

facilities in this parish or other areas similar to Innis, Batchelor, Lettsworth other than what is apparent to anyone viewing the area in person and actually being here on the ground as a witness to daily transactions at the three rural facilities.

Let's suppose closure of Innis Post Office did occur and the postal service continued to experience financial woes. At this point in time, if the area was re-evaluated for additional closure due to the close proximity of the Batchelor & Lettsworth Post Offices, where would the Post Office for the entire Upper Pointe Coupee area be located? Innis would be the most feasible due to the central locale. Innis is 8 miles from the Morganza spillway and 10 miles from the Simmesport bridge.

We can't understand why the Louisiana District is not budging on change for the best results! We now have a new library under construction and the sheriff office intends to build a new unit in town. Officials cannot remain in ivory towers and make decisions that are incorrect based on data that does not support the town's people or the holistic community. We realize that the US Postal System is strapped for money, but to eliminate one postal facility in the only town and keep two additional postal facilities at cross roads in an ultra rural area is senseless.

I respectfully submit and file this plea to request that the U.S. Postal Regulatory Commission set aside and pray that the U.S. Postal Regulatory Commission does not affirm the Final Determination of the United States Postal Service to close the Innis Post Office and establish service by community Post Office and that any such determination shall be reversed and returned to the Postal Service for further consideration.

Respectfully submitted,



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By Fax and U.S. Postal Service

Subscription

I certify under penalty of perjury that I have read the forgoing Petition; I Know the contents thereof; that the Petition has been subscribed and executed in the capacity specified in the document is true and no such statements are misleading; and that such document is not filed for purposes of delay.



Larry Rabalais

Exhibit E

1.)

- Photographs of New Construction
Innis 70747**
- Batchelor 70715**



Construction of New Innis Branch – Pointe Coupee Parish Library, Innis, LA



Pointe Coupee Parish Sherrif Office Incident Command Haz Mat Response, Innis, LA. The Pointe Coupee Parish Sherrif Office will construct a new facility in Innis in the near future to replace the existing office.



Batchelor, LA Post Office attached on the right of part of the multi purpose building that serves as a facility located at a confirmed Daiquiri, beer, and liquor convenience store. This photo was taken after 5 pm. Depicts Daiquiri and convenience store customers. This is the only business on this road for four miles to Innis and 8 miles to Morganza.