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

In the Matter of: Prairie Hill Post Office Prairie Hill, Texas	Docket No. A2011-50

UNITED STATES POSTAL SERVICE NOTICE OF FILING
ERRATA TO COMMENTS REGARDING APPEAL
(October 6, 2011)

On October 6, 2011, the Postal Service filed its Comments Regarding Appeal in PRC Docket No. A2011-50. The first page of that document incorrectly stated "October 12, 2011" as the date, when it instead should have shown "October 6, 2011." A corrected United States Postal Service Comments Regarding Appeal is attached.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(October 6, 2011)

On August 18, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked August 12, 2011, from postal customer Stell Waldrop, Jr. ("Petitioner") objecting to the discontinuance of the Post Office at Prairie Hill, Texas. On August 22, 2011, the Commission issued Order No. 820, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). The Petitioner filed a Participant Statement in support of the petition, but the Commission received no additional written communications from customers of the Prairie Hill Post Office. In accordance with Order No. 820, the administrative record was filed with the Commission on September 2, 2011.

The appeal and the Participant Statement raise three issues: (1) the impact on the provision of postal services, (2) the impact upon the Prairie Hill community, and (3) the calculation of economic savings expected to result from discontinuing the Prairie Hill Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal

Service's statutory obligations and Commission precedent,[1] the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Prairie Hill Post Office should be affirmed.

Background

The Final Determination To Close the Prairie Hill, TX Post Office and Continue to Provide Service by Rural Route Service ("Final Determination" or "FD")[2], as well as the administrative record, indicate that the Prairie Hill Post Office provides EAS-11 level service to no carrier delivery customers, to 69 Post Office Box customers, and to retail customers.[3] The postmaster of the Prairie Hill Post Office was promoted on July 5, 2007. Since the postmaster vacancy arose, an employee from a neighboring office was installed as an officer-in-charge ("OIC") to operate the office. The non-career postmaster relief ("PMR") serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility.[4] The average number of daily retail window transactions at the Prairie Hill Post Office is 13, accounting for 13 minutes of workload daily. Revenue generally has been declining:

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[1] *See* 39 U.S.C. 404(d)(2)(A).

[2] The Final Determination can be found at Item 47 in the Administrative Record. All citations to the Final Determination will be to "FD at ____," rather than to Item 47. The FD page number refers to the pages as marked on the upper right of the document. Other items in the administrative record are referred to as "Item ___."

[3] FD at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 1; Item No. 36, Proposal to Close the Prairie Hill, TX Post Office and Continue to Provide Service by Rural Route Service ("Proposal"), at 2.

[4] FD at 2, 5, 7; Item No. 21, Letter to Postal Customer from Manager, Post Office Operations ("Letter to Customer"), at 1; Item No. 36, Proposal, at 2, 7.

$17,346 in FY 2008 (45 revenue units); $14,078 in FY 2009 (37 revenue units); and $12,831 (33 revenue units) in FY 2010.[5]

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route delivery administered by the Coolidge Post Office, an EAS-13 level office located 11 miles away, which has 84 available Post Office Boxes.[6] This service will continue upon implementation of the Final Determination.[7] Rural service will be provided to cluster box units ("CBUs"), free-standing units of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. A parcel locker may also be installed for convenient parcel delivery for customers.[8]

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the Prairie Hill Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to all Post Office Box customers of the Prairie Hill Post Office. Questionnaires were also available over the counter for retail customers at Prairie Hill.[9] A letter from the Manager of Post Office Operations, San Antonio, Texas was also made available to postal customers, which advised customers that the Postal Service

[5] FD, at 2; Item No. 18, Post Office Fact Sheet, at 1; Item No.36, Proposal, at 2, 7.
[6] FD at 2; Item No. 18, Post Office Fact Sheet, at 1; Item No. 36, Proposal, at 2, 6, 7.
[7] FD at 1; Item No. 36, Proposal, at 7.
[8] FD at 2, 5, 7; Item No. 36, Proposal, at 2, 6, 7.
[9] FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Prairie Hill Post Office, at 1.

was evaluating whether the continued operation of the Prairie Hill Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Coolidge Post Office. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route delivery.[10]. Thirty-four customers returned questionnaires, and the Postal Service responded.[11] In addition, representatives from the Postal Service were available at the Prairie Hill Post Office for a community meeting on March 17, 2011 to answer questions and provide information to customers.[12] Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Prairie Hill Post Office and the Coolidge Post Office for 60 days beginning April 18, 2011.[13] In the absence of responses to the "Invitation for Comments" after the Proposal was posted, see Item No. 40, Analysis of Comments, the Final Determination was posted at the same two Post Offices starting on July 13, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record as Item 49.

In light of the postmaster vacancy; a minimal workload; low and decreasing office revenue;[14] the variety of delivery and retail options (including the convenience of rural

[10] Item No. 21, Letter to Customer, at 1
[11] Item No. 22, Returned customer questionnaires and Postal Service response letters.
[12] FD at 2; Item No. 26 , Letter to Customer, at 1; Item No. 24; Community Meeting Roster; Item No. 25, Community Meeting Analysis; Item No. 29, Proposal, at 2.
[13] FD at 2; Item No. 36, Proposal, at 1, 8, 15.
[14] *See* note 5 and accompanying text.

delivery to CBUs and retail service);[15] no projected population, residential, commercial, or business growth in the area;[16] minimal impact upon the community; and the expected financial savings,[17] the Postal Service issued the Final Determination.[18] Regular and effective postal services will continue to be provided to the Prairie Hill community in a cost-effective manner upon implementation of the Final Determination.[19]

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Prairie Hill Post Office on postal services provided to Prairie Hill customers. The closing is premised upon providing regular and effective postal services to Prairie Hill customers.

The Petitioner, in his letter of appeal and in his Participant Statement, raises the issue of the effect on postal services of the Prairie Hill Post Office's closing, noting the convenience of the Prairie Hill Post Office and requesting its retention. The Petitioner expresses particular concern that the Postal Service is closing the Prairie Hill Post Office solely for insufficient revenues. As the Administrative Record reflects, this is not true. Although the Postal Service did consider the Prairie Hill Post Office's low

[15] FD at 5; Item No, 36, Proposal, at 2-3, 6.
[16] FD at 6; Item No. 16, Community Survey Sheet; Item No. 36, Proposal, at 6.
[17] FD at 5-7; Item No. 18, Fact Sheet, at 1; Item No. 29, Proposal Checklist, at 2; Item No. 36, Proposal, at 7.
[18] FD at 5-7.
[19] FD at 1.

revenues, a variety of other factors also informed the Final Determination. Specifically, the Postal Service also considered the postmaster vacancy, a minimal workload, low office revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service), very little growth expected in the area, and minimal impact upon the community. FD at 2, 5, 6, 7; Item No. 16, Community Fact Sheet; Item 18, Post Office Fact Sheet; Item 36, Proposal, at 2-3, 6, 7.

Petitioner also contends that service through the Coolidge Post Office will not provide the maximum degree of effective postal services because 1) rural carriers can only provide minimal services; 2) customers are often unavailable (or, in the case of senior citizens or disabled customers, unable) to meet rural carriers at the CBUs; 3) shipping items do not fit into roadside boxes; 4) customers should not have to travel 11 miles to Coolidge to obtain services; and 5) rural route service is not secure against theft or exposure to adverse weather conditions. Each of these concerns was considered by the Postal Service.[20]

The Postal Service has considered the impact of closing the Prairie Hill Post Office upon the provision of postal services to Prairie Hill customers. FD at 2-5; Item

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[20] Petitioner also expresses concern that it is unsafe for customers to cross the road to retrieve their mail at CBUs. Because this concern was not raised during the administrative process, the Postal Service did not address it in the administrative record. The record contains no evidence now that would lead to the conclusion that either of these two main roads (which meet in a controlled intersection) in a town with a small population has steady, fast traffic that would make it unsafe for customers or carriers to access CBUs placed alongside them. The CBUs will be located in accordance with the requirement in POM 631.44 that "[b]oxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail." While Petitioner worries that installation of CBUs has been put on hold (Petition at 7), that is simply a normal consequence of the filing of an appeal and consequent delay in implementation of the Final Determination.

No. 36, Proposal, at 2-6. Rural route delivery to CBUs installed on the carrier's line of travel provides similar access to retail service, alleviating the need to travel to the Post Office. FD at 3, 5, 7; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 25, Community Meeting Analysis, at 2; Item No. 36, Proposal, at 2, 3, 6, 7.

As explained throughout the administrative record, carriers can perform many functions (at the same time that the carrier delivers the mail) that will prevent any need to go to a post office. Carrier service is especially beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or cluster box units. FD at 3; Item 22, Returned Optional Comment Forms and USPS Response letters, at 15, 21, 28, 32; Item No. 36, Proposal, at 2-3. Customers do not have to make a special trip to the post office for service. Most transactions do not require meeting the carrier at the mailbox. FD at 3, 5, 7; Item 22, Returned Optional Comment Forms and USPS Response letters, at 22, 29, 32; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 36, Proposal, at 3, 6.7. Special provisions are made, on request, for hardship cases or special customer needs. FD at 3, 5, 7; Item 22, Returned Optional Comment Forms and USPS Response letters, at 15, 21, 28, 32; Item No. 23, Postal Customer Questionnaire Analysis, at 2-3; Item No. 25, Community Meeting Analysis, at 2; Item No. 36, Proposal, at 2-3.

Additionally, the Postal Service explained that it offers several convenient options that can save customers a trip to the Post Office and having to interact with a carrier for most postal transactions. FD at 3, 5, 7; Item No. 36, Proposal, at 3, 6. Stamps by Mail

and Money Order Application forms are available for customer convenience. FD at 3, 5; Item 22, Returned Optional Comment Forms and USPS Response letters, at 29, 32; Item No. 23, Customer Questionnaire Analysis, at 2-3; Item No. 25, Community Meeting Analysis, at 2; Item No. 36, Proposal, at 3-6.[21]

The Postal Service also addressed customer concerns about heightened potential for theft of outgoing or incoming mail when switching to carrier delivery. FD at 2, 5; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 13, 16, 24, 27; Item No. 23, Customer Questionnaire Analysis, at 1; Item No. 25, Community Meeting Analysis, at 2; Item No. 36, Proposal, at 2, 6. At first, the Postal Service told customers only that the Postal Service was considering rural service (rather than identifying CBUs specifically). Item No. 21, Letter to Postal Customer, at 1. When customers – in their completed questionnaires and at the community meeting – raised concerns about the safety involved with leaving mail in rural boxes and packages that did not fit in the boxes at people's homes, the Postal Service addressed those concerns. Item No. 22, Returned customer questionnaires and Postal Service response letters, at 13, 16, 24, 27; Item No. 23, Customer Questionnaire Analysis, at 1; Item No. 25, Community Meeting Analysis, at 2. More specifically, the Postal Service explained that customers can add locks to their rural boxes and that packages that did not fit in the

[21] Petitioner also contends that the replacement service is ineffective because many customers only use credit or debit cards, and carriers cannot accept those as forms of payment. This was not raised during the administrative process, and therefore one will not find a Postal Service response in the Administrative Record. However, the Postal Service can answer the concern now. If internet service is available, customers can pay for most postal services and stamps (including Express Mail and Priority Mail, international mail, delivery confirmation, signature confirmation, and insurance) by credit card electronically via the Postal Service's Click-N-Ship serve and then leave the package for carrier pickup. See usps.com. Likewise, customers can purchase stamps over the phone (1-800-STAMP-24) by credit card, as they can by fax and mail.

boxes could be left safely outside the individual's home if he or she lived within a half mile of the boxes but was not home. Item No. 22, Returned customer questionnaires and Postal Service response letters, at 13, 16, 24, 27; Item No. 23, Customer Questionnaire Analysis, at 1; Item No. 25, Community Meeting Analysis, at 2. Later, in the Proposal, the Postal Service explained that it might provide rural route services to CBUs – secure free-standing units of individually locked mail compartments installed and maintained by the Postal Service with Postal Service-provided locks – rather than to regular rural boxes. Item No. 36, Proposal, at 2, 6. This would provide more secure options that customers were seeking. Additionally, the Postal Service explained that it might install a parcel locker, which can provide convenient parcel delivery for customers. Item No. 36, Proposal, at 2, 6. This would address the customer's concern about the safety of items left outside their homes.

In the absence of responses to the "Invitation for Comments" after the Proposal was posted, see Item No. 40, Analysis of Comments, the Postal Service issued the Final Determination confirming that service would be provided to CBUs and that a parcel locker might be installed. FD at 2, 5. The CBUs and the parcel lockers[22] should largely resolve the security concerns that the customers raised.

Upon the implementation of the Final Determination, delivery and retail services will be provided by rural route delivery to CBUs emanating from the Coolidge Post Office. In addition to rural delivery, which is the recommended alternate service, customers may also receive postal services at the Coolidge Post Office, which is

[22] Counsel has confirmed that five CBUs, each of which has two parcel lockers, will be installed in Prairie Hill.

located 11 miles away. The window service hours of the Coolidge Post Office are from 8:00 a.m. to 4:00 p.m., Monday through Friday and 8:00 a.m. to 9:00 a.m. on Saturday. FD, at 2; Item No. 36, Proposal, at 2. Furthermore, the special attention and assistance provided by the personnel at the Prairie Hill Post Office will be provided by personnel at the Coolidge Post Office and from the carrier. FD at 2, 5; Item No. 36, Proposal, at 2, 6. Thus, the Postal Service has properly concluded that all Prairie Hill customers will continue to receive regular and effective service via rural route delivery to CBUs installed on the carrier's line of travel.

Effect Upon the Prairie Hill Community

The Postal Service is obligated to consider the effect of its decision to close the Prairie Hill Post Office upon the Prairie Hill community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Prairie Hill is an incorporated rural community located in Limestone County. The community is administered politically by Limestone County, which also provides police protection. Fire protection is provided by the Prairie Hill Volunteer Fire Department. FD at 5; Item No. 16, Community Survey Fact Sheet; Item No. 36, Proposal at 6. The questionnaires completed by Prairie Hill customers indicate that, in general, the retirees, farmers, commuters, and others who reside in Prairie Hill must travel elsewhere for other supplies and services. See generally FD at 5; Item No. 36, Proposal at 6; Item

No. 22, Returned customer questionnaires and Postal Service response letters, at 34, 36, 38, 40, 42, 44, 46, 48, 52, 54, 56, 58, 62, 64, 68, 70, 73, 77, 79, 80, 83, 85, 87. According to Petitioner, Prairie Hill has one business, two churches, one cemetery, and one water supply corporation, in addition to the volunteer fire department. Participant Statement at 3.

The Petitioner's letter of appeal raises the issue of the effect of closing the Prairie Hill Post Office upon the Prairie Hill community. More specifically, Petitioner contends that the Prairie Hill Post Office, which has had a continuous presence in the town, plays an important role in the community by providing a place for a public bulletin board and community gatherings and by offering postal and nonpostal services to senior citizens and people with special needs. These issues were extensively considered by the Postal Service, as reflected in the administrative record.[23] FD, at 2, 3, 4 5; Item No. 22, Returned customer questionnaires and Postal Service response letters, at 15, 17, 21, 28, 29, 31, 32; Item No. 23, Customer Questionnaire Analysis; Item No. 25, Community Meeting Analysis; Item No. 36, Proposal 2, 3, 4, 6.

The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name. The record makes clear that the Postal Service is addressing this concern through preservation of the

[23] In his Participant Statement, Petitioner also expresses concern that closing the Prairie Hill Post Office would "stymie potential population growth for this rural area…." That concern was not raised during the administrative process, and thus the Postal Service did not address it in the Administrative Record. In any event, the Administrative Record contains no evidence of growth potential or that closing the Prairie Hill Post Office would have the effect of stymieing any growth that might have otherwise occurred. To the contrary, the Postal Service considered – irrespective of whether the Post Office was open or closed – whether the community was expected to grow in the future and found that no population, residential, commercial, or business growth was expected to occur. Item No. 16, Community Survey Fact Sheet.

community identity by continuing the use of the Prairie Hill name and ZIP Code in addresses. FD at 2; Item 22, Returned Optional Comment Forms and USPS Response letters, at 28, 31; Item No. 36, Proposal at 2; Item 22, Returned Optional Comment Forms and USPS Response letters, at 7; Item No. 23, Customer Questionnaire Analysis at 2; Item No. 25, Community Meeting Analysis at 2.

Communities generally require regular and effective postal services and these will continue to be provided to the Prairie Hill community. Rural carrier service is expected to be able to handle any future growth in the community. FD, at 5, 7; Item No. 36, Proposal, at 6, 7. In addition, the Postal Service has concluded that nonpostal services provided by the Prairie Hill Post Office can be provided by the Coolidge Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies. FD at 2, 3, 5; Item 22, Returned Optional Comment Forms and USPS Response letters, at 17; Item No. 36, Proposal, at 2, 6, 7.

Additionally, as already explained above in response to Petitioner's concerns about whether effective service will be provided to senior citizens and those needing additional assistance, the Postal Service considered the impact of the closing of the Prairie Hill Post Office on those individuals. The Postal Service explained that services provided at the Prairie Hill Post Office will be available from the carrier. Carrier service is beneficial to many senior citizens and others because the carrier can provide delivery and retail service to roadside mailboxes or cluster box units. Customers do not have to make a special trip to the post office for service. Most transactions do not require meeting the carrier at the mailbox. Special provisions are made, on request, for

hardship cases or special customer needs. Stamps by Mail and Money Order Application forms are available for customer convenience. FD, at 3, 5, 7; Item 22, Returned Optional Comment Forms and USPS Response letters, at 15, 21, 28, 29, 32; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 25, Community Meeting Analysis, at 2; Item No. 36, Proposal, at 2, 3, 6.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Prairie Hill Post Office on the community served by the Prairie Hill Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route carrier service would cost the Postal Service substantially less than maintaining the Prairie Hill Post Office and would still provide regular and effective service. Item No. 21, Letter to Postal Customer, at 1. The estimated annual savings associated with discontinuing the Prairie Hill Post Office are $49,097. FD at 5-6, 7; Item No. 36, Proposal, at 7. Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record and consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD at 5-6, 7; Item No. 36, Proposal, at 7.

The Petitioner questions the listed economic savings, noting that the “annual cost for replacement service of only $3,894 … was not detailed.” The responsible personnel

are well versed in the costs of replacement service (in this case, adding to an existing route one stop with a cluster of 69 boxes) and relied upon their experience to make the calculation here. The Postal Service has every reason to believe that the calculation in the record is accurate, [24] and the Petitioner does not provide a reason to believe otherwise.

Petitioner also questions use of the Postmaster salary and fringe benefits as the basis of annual savings because the office has been and could be operated by a PMR/OIC at a lower cost. While that observation has merit, the point is that one career slot is being eliminated. If that slot were filled in accordance with its current rating by a career employee, the salary would be as shown for a postmaster. In most discontinuance decisions the Postal Service values positions slated for possible elimination by the expense that would be necessary were a career employee assigned, in accordance with the complex set of agreements and regulations that govern employee and labor relations. This is a reasonable valuation by the Postal Service that constitutes an appropriate way of standardizing the valuation of positions. Hence while the Petitioner raises a reasonable question, the Postal Service approach is both defensible and reasonable; moreover it is efficient while adding comparability across discontinuance studies. Moreover, even if the postmaster's or OIC's hours were reduced, as Petitioner suggestions, the costs would still be substantially higher than the cost of effective replacement service.

[24] This calculation is very much in line with similar calculations in other recent discontinuance cases.

The Petitioner's letter of appeal also suggests various strategies that he thinks would further reduce costs for the Postal Service as a whole rather than closing rural offices with small budgets, such as eliminating Saturday delivery, streamlining management practices, and flattening the organizational structure. The Postal Service has broad experience with and has considered similar options, including implementing some of those options and asking Congress for permission for others, but must also recognize its obligation to maintain postal facilities in conformity with reasonable economies of postal operations while maintaining ready access to essential postal services. Moreover, the Postal Service is only required to demonstrate that the closure of the specific Post Office under review will satisfy the criteria set forth in § 404(d), not whether the impact of closing a number of rural offices will have a large impact on the Postal Service's financial situation. In this case, the Postal Service has determined that rural route service to CBUs is the most cost-effective solution for providing regular and effective service to the Prairie Hill community.

The Postal Service determined that rural carrier service is more cost-effective than maintaining the Prairie Hill postal facility and postmaster position. FD at 5-7. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster was promoted on July 5, 2007. A non-career employee from a neighboring office was installed as the temporary officer-in-charge (OIC). The non-career PMR serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility. The record shows that no other employee would be affected by this closing. FD at 2, 5, 7; Item No. 15, Post Office Survey Sheet, at 1; Item No. 36, Proposal, at 2, 7. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Prairie Hill Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Prairie Hill Post Office on the provision of postal services and on the Prairie Hill community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Prairie Hill customers. FD at 1, 7. The Postal

Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Prairie Hill Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Prairie Hill Post Office be affirmed.

Respectfully submitted,

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