

Before the  
**POSTAL REGULATORY COMMISSION**  
Washington, D.C. 20268-0001

Accepted 10/11/2011

**In the Matter of**

RETAIL ACCESS OPTIMIZATION INITIATIVE

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**Docket No. N2011-1**

To: The Commission

In the Matter of an advisory opinion on the Postal Service plan to examine whether to continue service to some 3,650 postal facilities and its conformance to requirements of Title 39 US Code, Docket No. N2011-1, I wish to make the following comments:

As one who will potentially be impacted by the closing of my own local post office in San Patricio, New Mexico due to the Retail Access Optimization (RAO) Initiative, I wish to offer my viewpoint of the proposed service closures and the manner in which it is being conducted.

Like most people, I would agree that drastic changes need to be made in how the Postal Service operates given the dramatic drop in volume of mail handled and the accompanying reduction in revenue. While there may in fact be opportunities to reduce expenses by closing or consolidating some postal facilities, it should also be recognized that the value of a given post office to its community often transcends the black and white analysis of its revenues, profitability, and employee workload.

Some of these transcending factors are simply common sense considerations whereas others require gaining a true appreciation of the special service needs of a given community. Such factors are not as easy to capture and study analytically as are the hard numbers generated for financial accounting and worker productivity purposes. In the case of the closure study of the San Patricio Post Office, I believe the consideration of these less analytical factors was severely lacking and resulted in inappropriate, and in some cases nonsensical, decisions. My observation is probably not an isolated occurrence in the RAO initiative, especially with regard to rural postal facilities.

Below I will share some examples of what is being proposed by the Postal Service to replace the services currently provided by the San Patricio Post Office if it is closed and the consequences to the community if these proposals are actually implemented.

1. If the San Patricio Post Office is closed, the Postal Service is offering its customers the "option" of receiving post office box delivery in the town of Tularosa, a distance of 53 miles away! This is not a mistake or a typo on the part of the Postal Service as the identical statement is made in both the announcement letter sent to all San Patricio postal customers as well as in the presentation made by the Postal Service during the recent community meeting. This option is completely unacceptable. If the best that can be offered is for postal customers to travel 53 miles in order to receive their mail, one would think that it would argue for keeping the existing post office open. But apparently the Postal Service believes that this alternative provides an acceptable level of service to customers in San Patricio. One must ask to what further extremes customers might be subjected by the Postal Service in the name of "optimization."

2. Another example where the Postal Service is out of touch with the needs of NM rural postal customers is the concept of the so-called Village Post Office. It is mistakenly believed that a number of local businesses exist which can provide outlets for postal services and which therefore eliminates the need to staff an actual post office. In fact, within a five mile radius of this post office the only regular business operating in San Patricio is the Hurd-La Rinconada Gallery, which features the paintings of three generations of American artists. I am quite certain the gallery has no interest in selling 44 cent stamps alongside \$10,000 paintings. The touted Virtual Post Office concept is simply not a viable option in San Patricio and for the Postal Service to suggest it as an alternative to the present post office shows a considerable lack of appreciation for the unique character and composition of this community.
3. The "Post Office on Wheels" is also being presented as a substitute for the existing post office facility. Among the many disadvantages of the Post Office on Wheels is forcing the customer to conform to the very limited schedule of the driver in order to transact any postal business. The window of available service time would seem to be no more than about 5 minutes and missing it means being forced to wait 24 hours for the next available opportunity. Recognize too, that taking advantage of this service means meeting the driver at one of a handful of highway cluster boxes (mail carriers do not deliver to the door here). But even if such a mobile service were to be utilized by customers it would seem that the amount of time required to conduct a number of different retail transactions at each stop along the route would interfere with the driver's delivery schedule and other duties making the success of this program questionable and the customer experience less than satisfactory. This service strikes me as a very poor substitute for the existing San Patricio Post Office.

The analysis conducted by the Postal Service under the Initiative evidently identified the San Patricio Post Office as meeting its criteria for possible closure. But a closer examination of the consequences of its closing, especially the ridiculous requirement to travel 53 miles to get you mail, strongly argues for keeping this facility open. The alternatives proposed by the Postal Service for providing effective service to this community are woefully lacking and place an inordinate and unnecessary burden on the postal customer.

This example of "retail access optimization" calls into question the methods employed by the Postal Service in its facility selection process, especially as they pertain to post offices serving rural communities. It would also suggest that the protections afforded rural communities by 39 USC 101(b) are in place to prevent just such inappropriate decision making as I believe were made in the case of the San Patricio facility. From what I have observed in my specific experience, claims by the Postal Service that "rural services would continue to be available through a variety of alternate channels beyond traditional brick-and-mortar facilities" were simply hollow and empty statements.

I urge the Commission to weigh very carefully the appropriateness of the Postal Services proposed action versus the real potential for causing similar harm to other small communities which heavily depend on the services provided by their local post offices.

Respectfully submitted,

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