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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268

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POSTAL REGULATORY
COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

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Docket No: A2011-61

Etna _____, New York _____ 13062
Post Office State ZIP Code

Etna Community Association _____, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Etna post office. The Final Determination was posted August 23, 2011.
(date)

2. In accordance with applicable law, 39 U.S.C. § 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages 1-2 of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

1 - We feel the decision to close the Etna post office was made arbitrarily and long before any input was gathered from the community itself. We feel the determination was made without regard to the best interests of the community, and was based entirely on the economic concerns of the Postal Service in direct opposition to the Postal Regulatory Act of 1970. We feel that the consolidation of the Etna Post office is unsupported by substantial evidence on the record.

2- While the total office receipts have declined since Fiscal Year 2010, it should be pointed out that the most significant drop in revenue took place after the retirement of the postmaster and her replacement by temporary officers-in-charge. The Postal Service listed the postmaster vacancy as a reason for closure in their final determination. However, the responsibility for not appointing a new postmaster in a timely fashion rests entirely with the USPS, rendering the closure action prejudicial and arbitrary. We understand the financial difficulties of the US Postal Service and today's economic realities, however we feel closing a small post office the size of Etna's has a negligible effect. According to the National League of Postmasters in a Business Wire article of September 15, 2011, rural post offices comprise about 0.7% of the USPS total expenses.

3 - A meeting was arranged with postal officials at the office on May 5, 2011. There was no support whatsoever for closure of the post office from the 32 Etna residents and representatives of the local business community in attendance. Questionnaires were mailed to 159 residents, and of those returned expressing an opinion, the count was 35 opposed to the closing to 6 favorable responses. On July 18, the Postal Service received a petition supporting the retention of the post office from 260 area residents, a number exceeding to an impertinent extent the number of questionnaires mailed. Clearly this is an indication that more customers use the Etna post office than the box holders, and no input was solicited from these customers by the Postal Service.

4 - We also feel that this closing is inconsistent with Government policy that the Postal Service provide the maximum degree of effective and regular services:

- A) Current residents of Etna are serviced by three separate post offices: Etna, Freeville and Ithaca. No provision has been made for mail delivery from the Ithaca office.
- B) Rural carriers will not provide the 9:30 a.m. mail pickup time that customers now have at the current post office, a problem for business customers and residents who need mail delivered in a timely fashion.
- C) Not taken into account was that the Freeville post office currently closes at 4:45 p.m. and not at 5:30 p.m. as in Etna, causing another inconvenience for customers that work regular hours.
- D) We have a number of senior citizens who are within walking distance of the post office now, but will not be if it is closed. We also have a concern for those who do not have internet access, cannot take advantage of the USPS online services, and require assistance from Postal Service employees with parcel mailing, money orders, and special needs that a small post office provides.
- F) We feel that customers concerns over mail security have not been fully addressed. Mailboxes in the area are subject to theft, vandalism, and damage by snowplows, traffic and the vagaries of the weather.

5 - While Etna has no retail storefronts other than the post office itself, the determination by the USPS that there is no business activity here is misleading or flatly incorrect. A partial list of businesses and organizations that use the Etna post office on a regular basis would include: The Boy Scouts of America, Sea Scouts, Academic Book Source, Phoenix Books, Tompkins Weekly, Ithaca Child, Gary Rith Pottery, Bo's Bones, Crackerman of Etna, Autoworks, Cornell University, National Audubon Society, NCSC (Terri Vantine), Wildtree Herbs (Heather Marshall), Hawkeye's Herbs, Tabby Bookkeeping, CNY Landscaping, Etna Community Church, Etna Community Association, FSM Sharpening, Etna Fire Company, J. Lowery Co, C Mark Enterprises, Bill Lowe Welding, If Only Farm, Creekwood Apartments, and Scrub Oak Farms. The closing proposal stated there were no churches or schools nearby, apparently failing to notice that the post office shares its parking lot with the Etna Community Church.

6 - No mention was made that the Etna Post office occupies a part of Houtz Hall, which is the historic and social center of the hamlet and used by the Boy Scouts, the Etna Community Church and other organizations in addition to the Etna Community Association. In a small neighborhood where news coverage is sparse by the usual media channels, it serves as a face-to-face meeting place and news dissemination point for nearly the entire community, and depends to a great extent on the daily traffic generated by the presence of the US Post Office, an institution in Etna since 1823 and the only federal presence here. The Etna Post Office has provided the community with far more than just postal services for many years, and serves as the hub of this unincorporated hamlet as well as providing a substantial part of the community identity.

7- While the determination to close the Etna post office included an annual savings breakdown including the postmaster salary and benefits and the \$4,480 annual lease agreement, there was no itemized listing of the cost of replacement service of \$22,713, which would have to be an estimate since the number of postal customers that would opt for rural delivery has not yet been determined. In addition, the Postal Service will not be eliminating any positions directly, but transferring employees to other postal facilities. Post office boxes continue to be the most secure and efficient method of mail distribution for a small community, a single postal employee requiring only a matter of a few minutes to distribute incoming mail as opposed to the hours it would require for a rural carrier even under ideal traffic and weather conditions.

8 – To summarize: We feel that the USPS has underestimated the impact on the Etna community, not considered the prevailing opposition to the closing of the post office, and overestimated the actual annual savings. It is clear to us that the Postal Service has disregarded both the letter and spirit of the law in making its determination to close the post office based solely on financial considerations. We would request that the Postal Regulatory Commission review this determination and either remand it for further consideration.

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