

Postal Regulatory Commission
Office of the Chief Admin. Officer

OCT 11 2011 BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268

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In the Matter of:

ETNA, NY 13062
Post Office State ZIP Code

POSTAL REGULATORY
OFFICE
Docket No: A 2011-61

SHARON J. SEARLES, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the ETNA, NY post office. The Final Determination was posted July 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 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.

Due to the following failures, the Final Decision to Close the
Post Office at ETNA, NY is not supported by substantial
evidence on the record: The POSTAL SERVICE has
(1) failed to adequately consider whether or not it will continue to
provide a maximum degree of effective and regular postal service
(2) failed to adequately consider the economic savings resulting
from the closure
(3) failed to adequately consider the effect on the community.
(Brief attached)

(1) The Postal Service failed to consider whether or not it will continue to provide a maximum degree of effective and regular postal service to the community.

Docket 1362780-13062

POST OFFICE SURVEY SHEET Item Nbr 15, Page Nbr 1-2

Question: Will time of mail delivery be effected? Documented response : NO

Petitioner response: **YES:** Mail is ready for pick-up the Etna Post Office at 9:30 am. Freeville and Ithaca Post Offices window hours are different from Etna's. It should also be noted that many of the businesses in our service area depend on this timely delivery so they can schedule their workdays effectively. Rural Route delivery times have not been communicated. Patrons understand that times will vary and are dependent on existing rural delivery schedules.

There are several patrons who reside on Main Street/State Rte 366 and Etna Lane who currently have free boxes at the Etna Post Office because there is currently no rural delivery available to them. There is no provision mentioned in the proposed Freeville rural route for mail delivery to these residences.

It appears that USPS is ignorant about not only demography of Etna but also the geography. Etna is divided by USPS into Freeville and Ithaca rural routes which are two separate postal districts. I am a resident of Fall Creek Parke on Lower Creek Road in Etna. The owner-landlord does not permit mail boxes on our streets within this mobile home park. This will not change if the Etna Post Office closes. Park residents currently rent Etna post office boxes and would be required to change their box locations to Freeville or Ithaca (which would be a six or twelve mile round trip). There are 36 homes in this park accessed by Lower Creek Road. The private homes on this same road currently receive rural delivery from the Ithaca Post Office, so I assume the mobile home park would also be assigned to Ithaca, not Freeville. We have received no information from the Ithaca Post Office on how they propose to deliver our mail. Some residents of the park (and of Etna) rely on local public transportation, do not own personal vehicles, and walk to the Etna Post Office.

Docket 1362780-13062

COMMUNITY SURVEY SHEET Item Nbr 16, Page Nbr 1

Question #6: Do postal employees offer assistance to senior citizens and handicapped postal patrons? Documented response: none known

Petitioner response: **YES:** Based on the testimony of Etna's previous two retired Postmasters (B. Van Duzen and J. Auble-Zazzara), there are many requests from all patrons for assistance (e.g. filling out money orders, parcel requirements, preparation and insurance). I personally needed assistance deciding on the most timely and cost-effective way to send a package to my sister in time for her birthday at the end of August. I am grateful for the personalized assistance I received.

(2) The Postal Service failed to adequately consider the economic savings resulting from the closure.

Although research supports that it is illegal to close our post office only for financial reasons, it appears to be the reason. However, financial disclosures are confusing and conflicting. The cost of providing rural delivery to some effected Etna patrons appear to be missing from the analysis. These substantial omissions from the record present a biased and inaccurate financial statement:

The bottom-line figures in the Docket No. 1326780-13062 (posted 07/22/2011) quotes annual replacement service cost as \$4,597 and annual savings as \$48,452. The posting on 8/23/2011 indicates replacement cost at \$23,713 and savings as \$29,336. These are based on an annual operating cost of \$53,049.

Then I reviewed the **Docket 1362780-13062** in the book at the Etna Post Office and was further confused by information located in:

Item Nbr17, Page Nbr 2 HIGHWAY CONTRACT ROUTE ESTIMATED COST for REPLACEMENT SERVICES

Number of addition boxes to be added to route: 28

Number of additional miles to be added to route: 1.0

Total annual cost for replacement service: \$4596.60

How do the 156 rental boxes at the Etna Post Office equal 28 rural boxes?

The explanation is these figures are specified for the **Albany District PFC only!**
(The Freeville Post Office only.)

Many Etna postal patrons reside in the rural route serviced by the Ithaca Post Office. This leads me to assume the other 128 postal rental box customers are NOT included in the **Freeville Post Office** (Albany District) rural service area, but the **Ithaca Post Office** service area! Therefore, these 128 boxes **are not included** in the annual replacement cost of \$4596. When I divide \$4596 by 28 boxes, the annual cost per box stated above is \$164. 128 additional boxes with an annual replacement cost of \$164 each equals \$20,992. When added to the replacement cost for the 28 boxes, the **annual replacement cost for 156 boxes is \$25,558 NOT \$4596.** (This uses the 1.0 additional mile factor that is also likely underestimated.) Based on the operating cost of the Etna Post Office of \$53,049 the savings is \$27,461. \$48,452 is incorrect.

There are also several patrons who reside on Main Street/State Rte 366 and Etna Lane who currently have free boxes at the Etna Post Office because there is currently no rural delivery available to them. There is no provision mentioned in the proposed Freeville rural route for mail delivery to these residences.

The Docket posted on 5/21/2011 states office receipts for the Etna Post Office were: \$79,126 in 2008; \$76,557 in 2009; \$68,146 in 2010. I do not have an accounting degree, but when an operating cost of \$53,049 is subtracted from any one of these receipts, I come up with a black figure, not red.

The 2010 figure was likely influenced by the retirement of our Postmaster in July 2010. She has never been replaced, and interim USPS employees (one was not even an OIC) lacked her professionalism, as well as her dedication to the Etna Post Office and the community. I feel this is reflected in the bottom line for 2010.

When B. VanDusen (retired 07/30/2010) was postmaster, she had received awards from the Albany district. It seems significant that of 75 similar facilities in the Albany district, only four were profitable with Etna being the first of those four. It is difficult to understand how the Etna Post Office went from award-winning to closing in such a short period of time. Etna was a self-sustaining location and likely has the potential to remain so if properly managed.

It appears USPS has created its own losing situation at the Etna Post Office by not replacing the retired Postmaster. The USPS' response for this is that there is a hiring freeze for management. This does not mean there is a lack of qualified personnel currently employed by USPS, as *the vacant Postmaster positions have been recently filled at Cortland and Groton Post Offices through internal transfers.*

(3) The Postal Service failed to adequately consider the effect on the community

The USPS solution to maintain identity is keeping the Etna Zip Code! Would the Etna zip code be available to NEW postal patrons who move into the Etna area or will they be forced to use Freeville or Ithaca? If not, Etna and the 13062 zip code will eventually become extinct by attrition and our cohesive hamlet that has existed for hundreds of years will literally disappear!

Postal Service responses documented in the Docket No. 1362780-13062 are incorrect or omitted. Therefore, the Final Decision to close the Etna NY Post Office is not supported by substantial evidence on the record.

Docket 1362780-13062

COMMUNITY SURVEY SHEET Item Nbr 16, Page Nbr 1

Question #4: HISTORY: Are there any special community events to consider?

Postal Service response: blank - response omitted

Petitioner response: The Etna Community Association is a non-profit organization that holds numerous fund-raising events at Houtz Hall where the Etna Post Office is located. Events included are Soup 'n' Salad Suppers, Ice Cream Socials, Rummage Sales, Chocolate Fest and Craft Fairs, et al. Proceeds provide funds for maintenance of the building, the Etna Children's Playground and tennis courts, as well as free Halloween Parties and Easter Egg Hunts for children.

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Question #5 What is the geographic/economic make up of the community?

Postal Service response: blank - response omitted

Petitioner response: The **demography** of Etna is diverse and includes those of all ages and from all economic levels. Some examples are:

1. students (Cornell University is five miles from Etna and the community college in Dryden NY is six miles)
2. commuters (public bus transportation is provided to the University and Community College, city of Ithaca, shopping malls, and to other surrounding communities))
3. self-employed (there are numerous cottage industries)
4. families
5. retirees and semi-retired

Geographically, the Postal Service has already divided Etna. Rural route service is provided by both Freeville NY and Ithaca NY (two separate districts).

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COMMUNITY SURVEY SHEET Item Nbr 16, Page Nbr 1

Question #6: Which non-postal services are provided by the Post Office ?

(e.g. bulletin board, community meeting place)

Postal Service response: none known

Petitioner response: Etna Community Association holds their meetings and events in the same building as the Post Office. Its vestibule is the Etna information center with two large bulletin boards used by our local church, organizations and businesses. A large easel is also placed there by the Etna Community Association to advertise pending events.

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COMMUNITY SURVEY SHEET Item Nbr 16, Page Nbr 1

What provisions can be made for these services if the Post Office is discontinued?

Postal Service response: none known

Petitioner response: There are no other retail or public buildings. The Post Office is our hub and the foot traffic generated by the Post Office is critical to the survival of the Etna Community. The Etna Association has no other place to advertise events and post volunteer sign-ups sheets. The resulting lack of participation would effect our proceeds and thus our ability to maintain our services for the community (maintaining the building, playground, tennis courts, free holiday events for children, et al).

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FACT SHEET Item Nbr 18, Page Nbr 1

Question #17: Schools, churches and organizations in Service area?

Postal Service response: No. 0

Petitioner response: The Etna Community Church neighbors the building in which the Post Office is housed and they even share a common parking lot! Organizations include Boy Scouts, Sea Scouts, Etna Fire Department, and the Etna Community Association (ECA).

The latter is a non-profit organization which holds numerous community events to raise funds which maintain the Etna playground and the Community Center/Post Office/Houtz Hall. This facility is used by local organizations and for various meetings - as well as being the home of the Etna Post Office. It is the hub of this proud and cohesive community and thrives on the foot-traffic generated by the Etna Post Office.

Docket 1362780-13062

FACT SHEET Item Nbr 18, Page Nbr 1

Question #18: Businesses in service area?

Postal Service response: No. 0

Petitioner response: There are numerous businesses, organizations and cottage industries regularly using the Etna Post Office: Boy Scouts, Sea Scouts, Academic Books Source, Phoenix Books, Tompkins Weekly and Ithaca Child Newspaper circulars, Rith Pottery, Autoworks, Cornell University, Wildtree Herbs, Hawkeye's Herbs, Tabby Bookkeeping, CNY Landscaping, Etna Fire Department, Etna Community Association, J. Lowery Beverage Distributing Company, Lowe Welding, If Only Farm, et al.

In addition, I believe **the public meeting and survey results are biased** as the public meeting was scheduled at 10:00 am when most postal patrons were at work. I believe this time was scheduled by the OIC because it was most convenient for her (after mail delivery and before her lunch).

The survey questions were standardized and loaded so many responses favor the Postal Service. Multiple choice selections were limited and often not applicable (e.g. I send packages on occasions such as family birthdays, Christmas, etc., not the choices listed as daily, weekly or monthly).

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