

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

In the Matter of:
Enloe Post Office
Enloe, Texas

Docket No. A2011-54

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(October 18, 2011)

On August 25, 2011, the Postal Regulatory Commission (Commission) received two separate appeals from postal customers Jack and Myrna Webb and Deloris Gillean. On August 26, 2011, the Commission received an appeal from postal customers Jerry and Susan Carrington (all the parties are hereinafter referred to as "Petitioners"). All Petitioners object to the discontinuance of the Post Office in Enloe, Texas. On August 25, 2011, the Commission issued Order No. 827, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 827, the administrative record was filed by the Postal Service with the Commission on September 8, 2011. Petitioner Gillean filed a Participant Statement, PRC Form 61, on October 4, 2011.

Initial Appeal Issues Raised by Jack and Myrna Webb

The Webbs allege that closing the Enloe post office will have an adverse effect on their small community. They allege that their post office helps attract new businesses and industries in their struggling community. They also point out that its closing will cause a hardship to the many elderly and disabled residents who depend upon it to maintain their independence. They state that the next nearest postal facility is

10 miles away, roundtrip. The Webbs believe the revenue generated from the 72 P.O. boxes should be more than the annual \$40,841 savings anticipated. Finally, as alternatives, the Webbs ask to instead have the Post Office closed on Saturday or only open 4 days per week.

Initial Appeal Issues Raised by Deloris Gillean

Ms. Gillean, like the Webbs, suggests that closing the Enloe post office will have a bigger effect on Enloe, since it is an economically struggling community. She also raises the fact that the Post Office carries the identity of the town with it. She states that the Enloe post office is handicapped accessible while the next nearest Post Office is not. She makes many of the same points as the Webbs. Finally, she suggests a Village Post Office as an alternative.

Initial Appeal Issues Raised by Jerry and Susan Carrington

The Carringtons' appeal focuses on the business impact resulting from discontinuance of the Enloe Post Office. They also allege that many residents receive their medicine via mail and would not like having such packages left in their rural mailboxes, due to heat and theft. They state that some of their elderly population will not be able to make the trip to the next closest postal facility. The Carringtons also focus on the identity that the Post Office brings to this small town, noting it has been operating since 1897.

In summary, the three appeals received by the Commission raise three main issues: (1) the effect on postal services, (2) the impact upon the Enloe community, and (3) the calculation of economic savings expected to result from discontinuing the Enloe

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, as outlined in 39 U.S.C. 404(d)(2)(A), and Commission precedent, the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Enloe Post Office should be affirmed.

Background

The Final Determination To Close the Enloe, TX Post Office and Establish Service by Rural Route Service ("FD"), as well as the administrative record, indicate that the Enloe Post Office provides a level EAS-11 service to 72 Post Office Box customers and retail customers 8:30 a.m. to 4 p.m., Monday through Friday and 8:30 a.m. to 10 a.m. on Saturdays and 24 hours of lobby access Monday through Saturday. FD at 1. The last postmaster of the Enloe Post Office retired on January 3, 2009. A temporary officer-in-charge (OIC) replaced the postmaster. Therefore, no career employees will be displaced by the closing of this Post Office.

The average number of daily retail window transactions at the Enloe Post Office is 24. Revenue has declined: \$21,458 in FY 2008 (56 revenue units); \$14,843 in FY 2009 (39 revenue units); and \$13,001 in FY 2010 (34 revenue units). There is one permit mailer or postage meter customer. FD at 1.

Upon implementation of the final determination, delivery and retail services will be provided by the Cooper Post Office, an EAS-18 level office. The hours of the Cooper Post Office are 8 a.m. to 4 p.m., Monday through Friday; the office is closed on

Saturday. At the time of the fact finding in the discontinuance action, the Cooper Post Office had 62 available Post Office boxes. FD at 1.

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Enloe 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 FD, customers received notice through other means.

Questionnaires were distributed to delivery customers of the Enloe Post Office. Questionnaires were also available over the counter for retail customers at Enloe. FD at 1; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Enloe Post Office, at 1. A letter from the Manager of Post Office Operations, Coppell, Texas, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Enloe Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Cooper Post Office, located 4 miles away.¹ 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. Item No. 21, Letter to Customer, at 1. The summary of the returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 33.

¹ This post office is much closer than the 10 miles alleged by one Petitioner in its appeal. Item No. 4.

In addition, representatives from the Postal Service were available at the Enloe Post Office for a community meeting on February 23, 2011, to answer questions and provide information to customers. FD at 1; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 25, Community Meeting Analysis; Item No. 33, Proposal, at 2. Customers received formal notice of the Proposal and FD through postings at nearby facilities.

The Proposal was posted with an invitation for public comment at the Enloe Post Office and the Cooper Post Office from March 30, 2011 to May 31, 2011. FD, at 1; Item No. 33. The FD was posted at the same two Post Offices starting on July 25, as confirmed by the round-dated FD cover sheets that appear in the administrative record. One congressional inquiry was received on April 25, 2011. FD at 1.

In light of the postmaster vacancy, a minimal workload, declining office revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service), minimal impact upon the community, and the expected financial savings, the Postal Service issued the FD. Regular and effective postal services will continue to be provided to the Enloe community in a cost-effective manner upon implementation of the final determination. FD at 1.

Each of the issues raised by the Petitioners 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 Enloe Post Office on postal services provided to Enloe customers. The closing takes into consideration the Postal Service's continued ability to provide regular and effective postal services to Enloe customers at other, nearby postal facilities.

The Petitioners, in their letters of appeal, raise the issue of the effect on postal services of the Enloe Post Office's closing, noting the convenience of the Enloe Post Office and requesting its retention. These concerns were considered by the Postal Service. Upon the implementation of the Final Determination, services provided by the Enloe Post Office, such as the sale of stamps, envelopes, postal cards and money orders, will be available at the Cooper Post Office, and will also be available from a rural or contract delivery carrier to roadside mailboxes located close to customer residences. FD at 8. Carrier service is beneficial to many senior citizens and to those who may face special challenges because they do not have to travel to the Post Office for services. FD at 8; Item No. 33. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order application forms are available for customer convenience. Item No. 33.

As explained above, one petitioner expressed concern over not having handicapped accessibility if Enloe closes since the Cooper Post Office is not accessible to disabled persons. Another concern involved the mailing of medicines to outside Post Office boxes, including the risk of possible theft or degradation due to extreme

temperatures. The last concern was that the elderly in the town would not be able to make the four mile trip to Cooper. Each of these concerns was considered by the Postal Service.

First, the lack of handicapped accessibility at the Cooper Post Office was noted and the response was that the Cooper Postmaster was made aware of this situation and will take the actions necessary to remedy it. Administrative File, Item No. 25, Postal Concern #1. Second, concerns about mailing medicine were addressed. The Postal Service explained that a notice will be left if a postal patron is not home when a package is delivered and taken back to the Cooper Post Office. Administrative File, Item No. 25, Postal Concern #9. In addition, mail security concerns were addressed in the record. The Postal Service explained that customers may place a lock on their mailboxes as long as the slot for inserting mail was large enough to accommodate the customer's normal daily mail volume. Item No. 33. Third, the travel concern was addressed during the community meeting by reminding postal patrons that travel is not necessary since many retail services previously available at the Enloe Post Office are also available from their carrier. Administrative File, Item No. 25, Postal Concern No. 4.

Thus, the Postal Service has considered the impact of closing the Enloe Post Office upon the provision of postal services to the Enloe customer, and has properly concluded that the Enloe customers will continue to receive regular and effective service. Carrier delivery will be made to roadside mailboxes and will also provide retail services, including the sale of stamps that the customer can arrange online, by phone,

or by leaving money or a note in the mailbox. Packages will be delivered to mailboxes, and those that are too large for the mailbox may be delivered to a convenient, customer-selected point up to one-half mile from the mailbox or at a designated place, such as on a porch or under a carport. Item No. 33. Proposal at Page 3. In addition, retail services and post office boxes will be available at the Cooper Post Office.

Accordingly, the Postal Service has properly considered the impact of closing the Enloe Post Office, and has properly concluded that the Enloe customers will continue to receive regular and effective mail service.

Effect Upon the Enloe Community

The Postal Service is obligated to consider the effect of its decision to close the Enloe Post Office upon the Enloe 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.

Enloe is an unincorporated community located in Delta County. The community is administered politically by Delta County Commissioners & Judge. Police protection is provided by the Delta County Sheriff and fire protection is provided by the Enloe Volunteer Fire Department. The community is comprised of retirees, commuters, the self-employed and farmers. Residents may travel to nearby communities for supplies and services. FD at 6.

The Petitioners' letters of appeal raise the issue of the effect of the closing of the Enloe Post Office upon the Enloe community. This issue was extensively considered by the Postal Service, as reflected in the administrative record. FD at 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 Postal Service is helping to preserve community identity by continuing the use of the Post Office name and ZIP Code in addresses and in the National Five-Digit ZIP Code and Post Office Directory. FD at 7; Item No. 28, Congressional Inquiry Response, Pg. 2. Communities generally require regular and effective postal services and these will continue to be provided to the Enloe community at the Cooper Post Office and through the rural route delivery service. In addition, the questionnaire responses show that many Enloe residents already must travel elsewhere for other transactions, such as shopping, banking, employment or personal needs. Item 22.

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 Enloe Post Office on the community served by the Enloe 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 Enloe Post Office and would still provide regular

and effective service. FD at 7. The estimated annual savings associated with discontinuing the Enloe Post Office are \$40,841. FD at 7; Item No. 33, Proposal, at 8.

The Petitioners' letters of appeal suggest various strategies, besides closing the Enloe Post Office that might promote efficiency, such as offering a Village Post Office or having reduced service hours. The Postal Service appreciates these suggestions. Based upon its broad experience and consideration of similar options, the Postal Service has determined that rural route service is the most cost-effective solution for providing regular and effective service to the Enloe community.

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, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD at 7; Item No. 33, Proposal, at 9. Petitioner Gillean questioned whether the economic savings included an amount to settle the lease. The administrative record states the lease does not contain a cancellation clause. Item No. 15, Post Office Survey Sheet. Nevertheless, excluding the annual lease savings would not affect the savings calculation significantly (\$32,617 per year instead of \$40,841). Moreover, while this issue was not raised in the administrative record, the lease includes an assignment clause and thus the lease costs can be saved if the property is subleased.

In sum, the Postal Service determined that carrier service is more cost-effective than maintaining the Enloe postal facility and postmaster position. FD, at 8. 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 last postmaster retired January 3, 2009, leaving the position vacant. A noncareer employee was installed as the temporary officer-in-charge (OIC). Upon implementation of the final determination, the noncareer OIC may be separated from the Postal Service. The record shows that no other employee would be affected by this closing. FD at 8; Item No. 15, Post Office Survey Sheet, at 1; Item No. 33, Proposal, at 8. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Enloe 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 Enloe Post Office on the provision of postal services and on the Enloe 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 Enloe customers. FD, at 8. 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 Enloe Post Office should, accordingly, be affirmed.

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

Respectfully submitted,

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