BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268

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POSTAL REGULATORY COMMISSION

In the Matter of:

La Grande, WA 98348
Post Office State ZIP Code

Docket No: A 2011-98

Postal Regulatory Commission
Office of the Chief Admin. Officer
NOV 1 2011

David + Judi Smith, Petitioner(s)

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the La Grande post office. The Final Determination was posted 9-1-2011 (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.

See 13 page w/ 7 listed attachments "Participant Statement" attached to this form

Participant Statement

Petitioner's Form 61 statements in support of the petition before the Postal Regulatory Commission regarding closing of the La Grande, WA Post Office Docket # A 2011-98

By the numbers (referencing the administrative Record filed by the USPS re: docket # 2011-98)

1. Item # 1, p #1

   Maintain town name—yes It appears this will only apply to those using rural delivery after closing. Others concerned about security would be forced to relocate mail service to the Eatonville PO or some other PO. These residents of La Grande would lose town identity. This Issue is of primary concern regarding loss of identity. (On PO security see Item # 14, p 1, 3/15/2011 USPS Karoly ltr "NBR records of mail theft or vandalism: 0", see also Item # 15, p #1 item 9 "no cases have been reported")

   The above office will become vacant when the postmaster was (sic) reassigned on 6/30/2011 Postmaster has remained at the La Grande PO continuously (1988 to date) in the same capacity after as before the USPS closing process and has responded he remains unaware of any reassignment and volunteered for none.

   Cost of required modifications exceeds the value... No reference in the Administrative Record exists to justify or clarify this statement or explain the source of the requirement. *(see Item # 6, p #1 "There is no building inspection or report nor photos for this office" dated 8/16/2011)* The present location inside the PO has existed as long as the PO has existed (June 27, 1910.) No complaints or problems are known to exist requiring modifications. The present appearance and design of the facility provides the reason for historic attention from numerous visitors throughout the country and world (see public comments in the Administrative Record.) Postmaster responded approximately 5 years ago a USPS contract person came to the store, took measurements, talked about building a wall in the front of the store, and left. No further activity regarding this matter evolved.

   *....lease for the La Grande Post Office expires soon...*Current lease runs 14 more months through December 31, 2012 (see Item # 18, p # 1, #16a Quarters—*lease expires "12/31/2012"*)

   The USPS can provide regular and effective service... Rural route delivery service does not "...provide a maximum degree of effective and regular postal services to rural areas, communities and small towns where post offices are not self-sustaining" (see PRC Form 61 p3 item C.) Rural delivery service has numerous shortcomings and limitations regarding timeliness, payment options, specialized mail services, access issues, mail security and more. Change to a rural delivery service as opposed to a post office is a minimizing of available services inconsistent with the intent of Title 39 US Code 404(b)

2. Item # 8, p # 1 (PS Form 150, Postmaster Workload Information)
   Item # 10, p # 1 (Window transaction survey)
   Item # 11, p # 1 (Survey of incoming mail)

Item #8, p # 15a—regarding seasonal workload—marked "N" for no SR7, the state highway on which the La Grande PO is located is commonly known as the "Mountain Highway" considered as the preferred scenic route to Mt. Rainier and has a great increase of traffic from late spring to late fall creating a surge in customer and tourist stops at the PO. Also impacting summer months is an increase in resident students at the nearby UW Pack Forest training facility and summer help at the City of Tacoma Alder park system and Tacoma Hydro Power system administered locally. The USPS workload survey was conducted in the first half of March, a month commonly in a "doldrum" period after the end of skiing season and before the surge of tourism traffic begins. It does not accurately represent even an average month. These same March figures are used throughout the Administrative record thus skewing actual volumes and workload data.

3. Item # 13, p # 1 (3/14/2011 ltr to OIC/Postmaster) under "Comments"
La Grande has nine houses and a Tacoma Power Station. There are 13 houses, one apartment, City of Tacoma Nisqually Power Project administrative and maintenance headquarters, and the University of Washington Pack Forest student residence facilities, administrative, operational, and forestry training headquarters.

4. Item # 15, p # 1, item 8 (Postmaster Survey Sheet)
HCR will be shorter and will not come to La Grande HCR first route stop is now La Grande and will follow the same highway route to the next in line PO at Elbe, WA which would after La Grande closing become the first stop.
What are the window service hours? 8-9, 15:30-16:30 M-F These stated hours were established after the process of closing began. Prior to that time for at least 35 years the hours were always established and posted as 8-10, 14:00-16:30 M-F, except during some lengthy periods where the City of Tacoma facilities had different working hours. During those accommodation times the PO hours were 7:30-10, 14:00-17:00 M-F
What are the lobby hours? 24 hours M-F, 24 Hours S For our 35+ years the lobby hours have never been available 24 hours. There have been numerous times when longer access could be made during regular business hours of the operational store the PO is in. During all of those times service was provided to customers.

5. Item # 15, p #2, #13c (Postmaster Survey Sheet)
7 boxes added to route Of the current 17 box holders at the La Grande Post Office 9 are residents in La Grande. Should all 9 opt to have a rural box established the USPS figure of 7 would not be accurate. Also two county roads exit from the main road running south & north. Each road has houses along them. Potential placement of boxes on those roads will increase the rural route delivery length.

6. Item # 15, p #2, #13e (Postmaster Survey Sheet)
What is the one-time cost of the CBU/parcel locker installation...0 Uncalculated here are the time costs of PO personnel for site visits to approve location of CBU/parcel locker, inspections and associated administrative costs. Also

unrecognized is the financial impact to the customers of providing and maintaining their own facilities for rural route delivery.

7. Item #16, p # 1, #2 (Community Survey Sheet)
There will be no growth because there are no building sites. We own 4 building sites in La Grande w/power, road & water. There are at least 3 other sites.

8. Item #16, p # 1, #4 (Community Survey Sheet)
None. There are no events or historical features. Suggest reading some local histories of the La Grande area. Nisqually Indian seasonal encampments for fishing, City Of Tacoma Hydro development, Canyada Lodge, Charles Lathrop Pack Forest, American Nitrogen Plant-first in nation, unique 350' deep Nisqually canyon, Tacoma Eastern Railway depot site, and, yes, the historical hub-- La Grande Post office, just to get started. Review public comments to see how current residents & visitors feel about the historic nature of La Grande through the store and Post Office.

9. Item #16, p # 1, #5 (Community Survey Sheet)
7 houses.....commuters and retirees There are 13 houses, one apartment, City of Tacoma Nisqually Power Project administrative and maintenance headquarters , and the University of Washington Pack Forest student residence facilities, administrative, operational, and forestry training headquarters. Also add self employed to commuters and retirees.

10. Item #16, p # 1, #6 (Community Survey Sheet)
Do employees of the office offer assistance to senior citizens and handicapped? Answer none. Postmaster renders help to seniors frequently especially during high tourist periods sometime providing curbside delivery of postal materials.

11. Item # 18, p 1, # 8 (Post Office Closing or Consolidation Proposal fact sheet)
Cost of required modifications exceeds the value... See item 1. above
....lease for the La Grande Post Office expires soon... See item 1. above
The USPS can provide regular and effective service... See item 1. above

12. Item # 18, p 1, # 11 (Staffing)
PM vacancy date: was reassigned 6/30/2011 Postmaster has remained at the La Grande PO continuously (1988 to date) in the same capacity after as before the USPS closing process and has responded he remains unaware of any reassignment and volunteered for none.

13. Item # 18, p 1, # 12 *Hours of service* (previously addressed-see number 4. above)

14. Item # 18, p 1, #15b *La Grande PO located in the front portion....*La Grande PO is located in the back of the store owned by the current Postmaster, not the front.

15. Item # 21, p # 1 (Vicki Johnson ltr dated 1/01/1900 [sic])
The Postmaster at the La Grande Post Office was reassigned on 6/30/2011 See item 12 above

Statement (re: Docket A 2011-98)

It appears from the Administrative Record early this year (2/28/2011) the USPS began the formal process to investigate and start the closing process for the La Grande, WA Post Office. In the initial letter (2/28/11 Vicki Johnson to Katherine Nash) five reasons were stated for closing this Post Office. They were "cost of required modifications" and the lease "expires soon" with "no other building available to house this facility" and the "existence of rural route delivery." (this reason also includes the issue of "regular and effective mail service")

Regarding the issue of "cost of required modifications" (Item 18, p 1, #8):

No reference in the Administrative Record exists to address, clarify or justify this statement or explain the source of the requirement. *(see Item # 6, p #1 "There is no building inspection or report nor photos for this office" dated 8/16/2011)*

There even exists confusion on the part of the USPS regarding where the post office exists inside the store. *(See* Item # 18, p 1, #15b *La Grande PO located in the front portion...)* The present PO location at the back of the store has existed as long as the PO has existed (June 27, 1910.)

No one in the community was aware of any intended changes to the facility. No complaints or problems are known to exist requiring modifications. The present appearance and design of the facility provides the reason for historic attention from numerous visitors throughout the country and world (*see public comments in the Administrative Record.*)

Postmaster responded approximately 5 years ago a USPS contract person came to the store, took measurements, talked about building a wall in the front portion of the store, and left. No further activity regarding this matter evolved.

It appears from the lack of supportive documentation and conflicting or confusing references in the record, modifications to the store have not been high in priority. The store has remained as it is for a very long time while no evidence of haste to remodel has evolved. It would seem there would be a great deal of documentation available for the record if this was an important matter which had been pursued. Yet, these "required modifications" stand as the first priority in closing considerations. This issue is unsubstantiated in the record.

Regarding the issue of the lease "expires soon"

At the time of the initial Vicki Johnson letter (2/28/2011) the lease still had 22 months to run expiring on 12/31/2012. (see Item # 18, p # 1, #16a Quarters—*lease expires "12/31/2012", Attachment 2*)

Throughout the record the terminology "expiring soon" is repeated in reference to the store lease. It is the second in order for reasons to close the Post

Office. The conduct of the closing proceedings seems to focus on this issue as a reason to proceed with a sense of urgency. Were the lease to expire this year such a priority status might be appropriate, but the record shows the USPS is fully aware (see above ref. to Item # 18) of the 12/31/2012 lease end date. "Soon" is a relative term, but in this case to raise it to such a priority seems overemphasized. Even at the end of the 120 day appeal period 11 ½ months would remain on the lease. The facts bear out this is not an urgent issue requiring closing.

Regarding the issue of "no other building available to house this facility."

Although there is commercial property next to the Post Office with power, water, road, and a septic system, there is no other suitable commercial building in La Grande. There is little need to document this because there is only available property to develop in La Grande. It is highly unlikely anyone can, overnight, magically produce a new commercial building in La Grande. No dispute here.

Regarding the issue of rural route delivery and "regular and effective mail service"

There is an existing rural route delivery that passes through La Grande operating out of the Eatonville Post Office. It appears to have 1 or 2 customers near La Grande. No dispute here.

To compare "regular and effective service" of the Eatonville rural route delivery system to another such system would be very appropriate. To compare the Eatonville rural route delivery system to the service offerings of the La Grande Post Office would not. If this were so, there would be very little justification to have any Post Office. Post Offices could easily be replaced by administrative and mail routing centers. Inherent in this discrepancy is the very recognition of a fundamental and distinct set of purposes for each function.

Here comes one of the elephants in the room.

The limitations of the Eatonville rural route delivery system cannot, by its very nature, provide a "....maximum degree of effective and regular postal services...." (underlining ours, but probably not necessary) in comparison to the offerings of the La Grande Post Office. There always will be a limiting and downgrading of services below what the La Grande Post Office can provide in comparison to those of the Eatonville rural route delivery.

Can the Eatonville rural route delivery provide a regular service?—We hope so. Will it be equal to present service—Clearly not. Even with the limited hours of the La Grande Post Office, once a day rural delivery service (regular or not) would represent a significant loss to the community for access to services. It

would cut direct access from hours at different times in the day to an unguaranteed time slot of minutes once a day. Catch 'em if you can.

With the exception of dropping mail in the box, other functions both PO and delivery provide carry limitations on the side of the Eatonville rural route delivery. (see Item # 21, p 4 to get a feel for limitations on service) Inability to deal directly with accountable mail, no cash/change transactions, unable to scan time sensitive mailings, pre-written checks, day delays to process requests, forms to be filled out and left in route box for services, trying to catch the delivery person, package delivery limitations, cost transfers to customers for purchase and maintenance of boxes, establishment of a community oversight group for purchase and maintenance in the case of CBU installations, inspection and approval costs & delays, loss of a place for UPS & Fed Ex to leave material, just to name a few. And after all this there will still be a need to use Post Office services for some services which cannot be done at all by the delivery system. This is not even an apple to apple trade let alone a focus on maximizing of services.

Even though contradictory statements exist in the record regarding the ability of a rural route delivery to provide the same services as the La Grande Post Office, the USPS seems to acknowledge there are limitations to delivery. (Final Determination summary *"....no longer be a retail outlet in the community."*, *".....services may be available from a retail carrier, which could alleviate the need to travel to a Post Office for service."* The rural delivery does not provide service as a full retail outlet and the "may" and "can" is acknowledgement of limitation of retail services. Implying full service is not provision of that service.

None of this is intended to discredit the rural route delivery system; it is just a fact of the operational nature of the beast. It is, however, a trade down, not across or up.

We maintain rural delivery as maximum service trade-off and elimination of the La Grande Post Office inconsistent with the intent of Title 39 US Code 404b stating: "USPS shall provide a maximum degree of effective and regular services to rural areas, communities and small towns where Post Offices are not self-sustaining"

Even the record seems to acknowledge the degree of importance and intent the exact language has by avoiding use of "shall" in every acknowledgement of this issue. The record appears to offer no comprehensive, consistent, or clear understanding of what this language represents to the USPS. (See Item # 1, p #1, *"....can provide...."*—no use of "maximum", Item #18, p#1 *"....can provide...."*—no use of "maximum", Item #21, p #1 *"....will provide a*

maximum....", next paragraph—"*....can provide....*"—no use of "maximum", Item #29, p # 2 (checklist sheet)"*....need to provide a maximum degree of effective and regular service must be paramount....*", Item # 33, p1 "*....can provide....*"—no use of "maximum", Item # 33, p5 "*....will provide a maximum...*", Final determination under I. "*....can provide....*"—no use of "maximum", later under I. "*....will provide a maximum....*", later under VI. "*Effective and regular service....*", throughout the USPS response form letters "*....effective and regular service....*" Item # 45, p 1 "*....effective and regular service....*" There is also nowhere in the record reference or connection to the last words "*....where Post Offices are not self-sustaining.*"

We hope for both sides, in the avalanche of minutia over responding, arguing and defending positions on these matters proper focus can be maintained. This is still all about a singular Post Office in La Grande, Washington and its unique circumstances and characteristics.

Imbedded in the Record appear to be other considerations for the closing, but not directly defined as such. They warrant addressing.

<u>Postmaster vacancy</u>

Item # 21, p # 1 (Vicki Johnson ltr dated 1/01/1900 [sic])

The Postmaster at the La Grande Post Office was reassigned on 6/30/2011

Administrative record-From Final Determination under I. Responsiveness to Community Postal Needs, para 2 states: *"The postmaster position will become vacant when the postmaster was (sic) reassigned on June 30, 2011. Since the Postmaster vacancy an OIC has been installed to operate the office."*

Administrative record-From Final Determination under VI. Summary para 2 states: *"The postmaster was reassigned on June 30, 2011."*

Postmaster has remained at the La Grande PO continuously (1988 to date) in the same capacity after as before the USPS closing process and has responded he remains unaware of any reassignment and volunteered for none.

Item # 29, p #1 (Proposal checklist) Section III Effect on Employees

"Reason for vacancy and information on postmaster/OIC"

"If a Postmaster or other employees are reassigned this must be explained and tell whether the reassignments are voluntary."

Nowhere in the record can be found any information explaining this reassignment or whether it is voluntary or involuntary, yet it is checked off in two different categories. This lack of information exists both before and after the stated reassignment. From the above, it is clear a vacancy has been created on paper, but no such vacancy exists or is currently filled by an OIC (Officer in Charge) at the La Grande Post Office.

Financial savings

This one is another elephant in the room

This matter is first encountered under Item # 29, p # 2 Section IV Economic Savings and shows on the balance sheet "Total annual savings of $16,274" This is the one and only time this figure is reflected in the record. This sheet is dated 5/20/11.

Item # 33, p # 6 Section IV Economic Savings states: "Total annual savings of $15,791"

Later on this same page it is stated: "The Postal Service will save an estimated $15,971 annually." There is no indication in the record why these figures are different. This sheet is dated 5/31/2011

In the Final Determination near the end of the record the $15,971 figure is again stated under category IV Economic Savings. The date of this last reference is 8/30/2011. These appear to be the only references to this matter in the record. This discrepancy in figures is not addressed or cleared up in the record. Our attempts to contact the USPS both verbally and two times in writing regarding getting financial data specific to the La Grande Post Office to date have never received a response. (see 9/17/11 Appeal letter to the PRC) regarding this matter it states:

> Prior to the recent discovery of this USPS determination, we requested additional financial information from the USPS in our formal July 15, 2011 (see item 1) response letter. A 7/20/2011 response letter from the USPS (see item 2) did not provide any requested financial information relating specifically to the La Grande Post Office. It only contained unspecific information about consolidations and services which have been available for some time as means of eradicating the USPS financial problems. After receiving this letter, we sent a 7/23/2011 (see item 3) letter requesting very specific information from the USPS. To date there has never been a response to our 7/23/2011 letter.

Had we been able to open up a communication link with the USPS back in July it is conceivable there may be no reason to dispute the USPS figures regarding this. At the very least, we might know which figures to base our calculations on and, presumably, understand the formulas used which we have no ability to consider. Any such dispute could have been worked out before reaching this late stage. However, not feeling comfortable to comment specifically without knowing which figure is the accurate version, we can only say we believe issues of revenue loss by closing the La Grande Post Office have not been considered. Impact related matters of personnel shifts, customer moves to competing businesses, and cost transfers to the community have not been included either. Our position remains this has not been fully explored or accurately presented.

Of the responses that are non-specific to the USPS figures, but still pertinent to the closing we offer the following:

Final Determination VI Summary para 2 "The mail volume has declined" Yet, the revenue has increased. Strange.

The current economic conditions have affected the La Grande area. There are two vacant houses here that have not been vacant for most of the years we have lived here and never for this long. Past occupants of these houses always had a La Grande PO box.

Box rentals have been affected even from those who live or lived outside the La Grande community. The entire area has seen a portion of people cutting back or moving closer to Tacoma, the nearest large city.

In spite of the impact to the La Grande Post Office, revenue has risen 11.9% in 2009 and 9% more in 2010 over the previous FY. (see Item # 18, p # 1 Receipts box) There exist no rate increases and there is a declining economic environment during this time frame. The Postmaster has been recognized by USPS in his efforts to promote services and products to accomplish this. In spite of some beliefs, this negative economic period is likely to end as all others have. This is a temporary impact on the La Grande Post Office.

The USPS survey of work and time related matters in the La Grande Post Office was conducted in the first half of March. Item # 8, p # 1 #15b states no seasonal workload exists at the La Grande, PO.

The reality is quite different. SR7, the state highway on which the La Grande PO is located is commonly known as the "Mountain Highway" It is considered the preferred scenic route to Mt. Rainier and has a great increase of traffic from late spring to late fall creating a surge in customer and tourist stops at the Post Office. Also impacting summer months is an increase in resident students at the nearby UW Pack Forest training facility and summer help at the City of Tacoma Alder park system and Tacoma Hydro Power system administered locally. The USPS workload survey was conducted in the first half of March, a month commonly in a "doldrum" period after the end of skiing season and before the surge of tourism traffic begins. It does not accurately represent even an average month. These same March figures are used throughout the Administrative record thus skewing actual volumes and workload data. If one wants to create a perfect storm to make a point they can, but that does not mean the wind is blowing.

And—yup, here it comes—the impact of "USPS shall provide a maximum degree of effective and regular services to rural areas, communities and small towns *where Post Offices are not self-sustaining*" (italics ours)

<u>The short & practical reality of all this is:</u>

This closing action is based solely on consideration of financial needs.
Even if the undocumented claim of remodel costs is real it is a financial matter.
There is no "soon" expiring lease.

The transfer of services to rural route carrier is a financial matter.

(Item 33, p5 (USPS response to customer concern about economic savings)

"Carrier service can be and, in this case, is more cost-effective than maintaining a postal facility and a postmaster position. The Postal service estimates an annual savings with this change. Additional funds are necessary in larger cities because of a greater workload. Larger cities often realize a greater revenue which can offset their greater expenses."

The services of a rural route carrier are not a maximizing advantage to customers. There is no vacancy of the Postmaster in the La Grande Post Office.

It seems well known that eliminating 10,000 of these small Post Offices would save less than 7/10ths of 1 % of the USPS budget. We will not try to reduce this figure down to determine what portion the single La Grande Post Office would have. If we were to accept the highest USPS's year's savings, it is unlikely to cover the doughnut budget at a USPS conference. The actual savings—much less.

For the below categories most detail has already been addressed above and we will not belabor those references here.

Responsiveness to Community Postal Needs

1. Not a single response from the direct local customers or all others (38 total) responded favorably to the closing or change to rural route delivery.
2. Although a USPS checklist item in two locations, no explanation of the supposed Postmaster vacancy, voluntary or otherwise, exists anywhere. We do care about this matter. In spite of the appropriate check mark it is not covered.
3. Ignoring verbal and written requests for clarification information is not a responsive indicator of community needs. Still waiting for response from Eatonville PO, too.
4. The USPS form letter response to customer comments is so mechanical it even referred to the Chair of the Pierce County Council as "Dear Postal Customer." He may be a customer somewhere, but not in La Grande and his position deserves greater respect—or at lease acknowledgement that his letter might have been understood or considered.
5. The dismissive nature of this indicates more a haste to dispatch an annoying requirement than to actually pause to consider other possibilities.
6. There is no indication anywhere that the USPS is willing to look at other options to work with the community to see if some alternate or beneficial solution can be reached to help resolve the USPS financial difficulties.

If the USPS wants to know why compelling and eloquent arguments and reasons were not universally stated in community responses consider this: You are walking across some tracks mindful of events of your day and are suddenly startled by a train speeding at you. You

did not notice it before. You quickly assess your options. Defending yourself isn't among them. So, you leap into a ravine of thorn bushes and rocks. At first you feel relieved. Later when you can properly assess what happened you realize you are not as well off as you were before. On the train, the engineer has been so focused in speeding toward his goal there was no time to consider brakes, scenery, or other options. Even though both may avoid immediate disaster, neither side benefits in the long run.

Effect on the Community

1. Community identity. This matter is repeated throughout the customer responses. It is singular in its connection with this geographical place and is solely represented by the existence of the La Grande Post Office as it has been since 1910. Through compromise offered by the USPS—change zip, keep name only if you accept rural delivery—the community is held hostage to one option to remain identified. If security of mail is a high priority there is no option to retain the name when residents are forced to go to another Post Office for a box. So, once more another trade-down is disguised as a service change benefit. It isn't.
2. Historical value. In the town of Elbe, WA about 11 miles farther down the road there is a nondescript, cinder block post office with a dedicated staff, a small rural route with a handful of customers, and a busy little community with a seasonal tourist attraction. About the only non-resident people entering the post office out of curiosity are retired postal employees. It is photographed more by accident then intention.
   Contrasting this, the La Grande Post Office is photographed, visited, and used regularly for both postal and non postal reasons. Its historic assets have a wide reputation. The current Postmaster has served 23 years (10 before that as PMR), the previous Postmistress served 49 years, both are family members and a primary reason for people's interest in catching up or asking about the local area. Their combined institutional and regional memory covers 72 of the 101 years the La Grande Post Office has existed. They have both volunteered countless hours in serving us beyond any expectations. The La Grande Post Office represents what is still right about the Postal Service. It is about dedication and service. It embodies the Postal Service motto in every way and represents what the Postal Service should be celebrating and advertising, not eliminating. In the cab of the speeding train there is no time to see such advantages and to ponder marketing and promotion of this unique facility.
3. Yes, we have arrived at the emotional appeal part, but it is an appeal to reason and common sense. We respectfully challenge you to go through the customer responses, to truly look at how strongly people react to this post office, to understand just how deeply this feeling runs. Ask why someone from a foreign country or another state would take the time to comment in writing on this little place. We challenge the USPS to get out of the cab of that train and take another look at what they really have here in La Grande, Washington. It may be refreshing to see how a perceived liability can turn into a unique asset just by looking at it differently.

Summary

The USPS says the remodel is too expensive, but doesn't know where the Post Office is in the store or have records of inspection reports or pictures. It also is ignorant of historical importance, hours of operation, that there is a seasonal work load or the assistance the Postmaster gives to the elderly. Even the big one—amount of savings—has two versions, unexplained. Yet somehow, it implies through the record and its checklist, the closing process has been carried out thoroughly.

The community seems no better off than the Post Office. USPS doesn't know how many houses or building sites there are (apparently no google earth here), how many elderly need assistance, or has given any real consideration to help people transition. It only parrots "effective and regular" service regarding rural delivery, but has offered no real solutions or assistance to the after effects of the closing, i.e. direct information on how long the process of local box (CBU or other) will take, inspection and costs, or specific site location options, (referring so far only to a "central location" along the route.)

It seems only to care about identity when holding it as a carrot bribing customers to accept the lesser service of rural delivery. It penalizes those residents who want to maintain security by relocating to Eatonville PO for a box. Not an identity option here.

USPS has effectively withheld information needed to make a rational assessment by not responding to requests for it, continuing a "fend for yourself" attitude throughout the process. All in this community struggle to know what questions to ask, let alone know where the resources are to get them. We don't know all the pertinent laws or rules and how they apply. Ironically, the USPS is our source. Sorry, to busy right now. Goals to meet.

The checklist looks great with perfectly placed checkmarks in every space, whether they are applicable to the circumstances at La Grande or not. It is as if the process is all that matters and the intent and purpose of that process are lost through worshipping it.

While the community is still trying to climb out of the thorn bushes and just beginning to understand what has happened, the process rolls on. Were it not for the appeal they would just be realizing there is still a lot to deal with in the transition, but the post office would already be closed. Where would their mail be?

The community is not the enemy or an obstruction to get by and neither are the laws, rules, and requirements that are partly there to slow things down so calmer minds might prevail, but right now all seem tied to the tracks.

How any of this qualifies as meeting the intent or letter of the laws, rules and guidelines is a mystery, yet the boxes are checked and the train moves on.

It feels like the community is too small to matter, the USPS to big and focused to care. "Stoke that fire, boys, there are goals to be met."

As we look back, there is a dull, metallic din and it keeps repeating "Dear Postal Customer", "Dear Postal Customer". It is repeated to all who took the time and effort to write and is only overshadowed by the mechanical, repetitious, and computer generated responses within the USPS letters. They can't discern a Political body from a customer—at least they are not prejudiced. Another check box done.

And we are stuck in the thorn bushes of indifference watching the train race on.

The ultimate irony is simple. None of this has to be this way. La Grande is meaningless in the greater scope of things. So is the USPS.

To the USPS La Grande cannot represent anything of significance. If it did the USPS would have treated this matter with much greater attention and detail. It would have acknowledged the huge financial reward of eliminating a great liability to its system.

Yet, this little Post Office offers everyone a reason to feel connected. Really read those responses, notice how far flung and diverse the people are who recognize this. Recognize the unbelievable and extraordinary dedication of this Postmaster and those serving before. It is an example of what is best about the USPS. Don't lose this. This is an opportunity to capture and present an image the USPS has drifted away from and should be proud of. This train hasn't gone off the cliff. The USPS is not an evil ogre. There will be a resolution to the financial difficulties. The Postal Service is what is best about our country right now. There is an exception here that can set things right and begin to take away an image that is undeserved. Right now it is just here in La Grande, not anywhere else.

But the train has to pause.

David Smith 10/31/2011 Judi Smith

David Smith Judi Smith

David & Judi Smith, P. O. Box 22, La Grande, WA 98348, (360) 832 3888

Attachments

1. 10/21/2011 Washington State Legislature Letter
2. Copy of La Grande current Lease Renewal Option
3. Postmaster statement
4. Clarification of attachments to Participant Statement
5. 9/17/2011 Smith Appeal ltr & 3 enclosures (see Clarification of attachments to Participant Statement)
6. Request to hold closing in abeyance
7. Waiver of electronic filing (previously faxed 10/27/11, & mailed 10/28/11 to PRC)

Attachment 1

PRC docket # 2011-98
rec'd 10/22

WASHINGTON STATE LEGISLATURE

October 21, 2011

Postal Regulatory Commission
Public Affairs & Government Relations
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

Dear Commissioners,

Recently, the offices of the Washington State Representatives, 2nd Legislative District, received correspondence from a constituent concerned with the potential closure of their local post office in La Grande, WA. We, too, share their concerns. The value of this location should not be measured or determined by financial concerns alone. The rural and rugged topography of the area makes it difficult for those living in this area to access their mail from a location that is further away, particularly in the winter months. The historical value of this 100+ year-old post office building is priceless.

We and the residents served by this post office would most appreciate your removing the La Grande Post Office from the potential closure list. The integrity of this long lived governmental service, at this location, should be preserved for future generations to enjoy and learn from. Thank you for your consideration.

Sincerely,

Randi

Senator Randi Becker

Jim

Representative Jim McCune

J.T. Wilcox

Representative JT Wilcox

RB/hah

Cc: Congressman Dave Reichert
David and Judi Smith, Eatonville, WA

Attachment 2

PRC docket #2011-98

UNITED STATES POSTAL SERVICE.

Exercise of Renewal Option

Facility Name/Location LA GRANDE - MAIN OFFICE
46518 MOUNTAIN HWY E LA GRANDE WA 98348-9998

County: PIERCE
Project: E29538

TO JOHN ALLEN NORDSTROM
PO BOX 41
LAGRANDE WA 98348-0041

Certified Mail #: 3910 6108

Issuing Office
Western FSO
160 INVERNESS DRIVE WEST SUITE 400
ENGLEWOOD CO 80112-5005

Date of Existing Contract: 05/16/1997

Options available (Number and Years)
1 Option(s) covering 5 Years

Pursuant to the contract with you covering this facility, the Postal Service hereby exercises its option to renew said contract as follows:

Term: 5 years	From (Date): 01/01/2008	To (Date): 12/31/2012	Annual Rate: $1,800.00

There is/are 0 renewal option(s) remaining. In all other respects the said contract shall remain the same and is hereby confirmed.

Remarks
EXERCISING FIVE YEAR RENEWAL OPTION AT AN INCREASED ANNUAL RENTAL RATE FORMERLY $1200.00.

THANK YOU FOR PROVIDING THIS SPACE FOR POSTAL USE.

Date	Name of Contracting Officer	Signature
09/30/2005	CANDACE KINNE	Candace Kinne

Attachment 3

PRC docket # 2011-98

I have reviewed references in the "Participant Statement" to conversations I have had over the course of the USPS post office closing process and believe they represent an accurate account of my responses to Mr. Smith's questions. As directed, I offered no information other than to respond to Mr. Smith's direct questions concerning the closing issue.

John A. Nordstrom 10/31/11

John Nordstrom Date

Postmaster, La Grande Post Office

Attacment 4

PRC docket # 2011-98

Clarification of attachments to the "Participant Statement"

Included in the attachments is a letter from the Washington State Legislature to the Postal Regulatory Commission. It is dated October 21, 2011. We received a courtesy copy of this letter on October 22, 2011. It was the intent this letter reach your office by the October 25th deadline. It did not. There was a failed attempt to transmit it electronically on October 25th. A follow-up with your staff late last week indicates it still has not been received. It appears—dare we say—to be lost in the mail. Even though we acknowledge the deadline is past, we include it here for whatever purpose it may serve. If there are any questions about it we would refer you to any of the signers, Senator Becker, Representatives McCune or Wilcox.

It is our understanding our original (9/17/2011) Appeal letter and its 3 enclosures are part of the full record to be considered. Since references are made to the 9/17/2011 letter and enclosures in our Participant Statement we are not including it as a direct attachment to this Participant Statement, but will consider it included as part of the full record.

Also included is a copy of our request for waiver for requirement to file electronically. This request was previously faxed to the Postal Regulatory Commission on 10/27/2011. The next day (10/28/2011) the enclosed letter and the original signed waiver was mailed to the PRC. This copy will be the third such transmittal to the PRC.

ATTACHMENT

PRC docket # A 2011-98

I

Reference Only

This blank sheet through its placement here represents the 9/17/2011 Smith Appeal letter and its 3 enclosures (Comment ltr to Wm Todd, USPS, USPS response ltr from Vicki Johnson, Mngr PO Operations, and 2nd request to USPS (Vicki Johnson.)

These letters currently exist as part of the full record to be considered and are not transmitted at this time with the understanding they will be included here from the existing record of docket # 2011-98.

Attachment 6

PRC docket # 2011-98

Request to hold closing of the La Grande Post Office in abeyance

Under advice of PRC staff, we are including this request with our Participant Statement. It is unclear at this time what plans for actual closure of the La Grande Post Office by the USPS exist. It is our understanding the time frames in place would allow this Post Office to be closed as early as November 1st or 2nd.

We discovered late that the process to transition to rural route delivery, if necessary, could be cumbersome especially in the case of a CBU installation. We are told purchase, installation, required postal inspections and sight approvals could take weeks. There would also have to be a community consensus on this matter.

To date, there has been no prominent or obvious postings of any of these closing proceedings at entry ways or at the inside Post Office location. Materials are there for review, but remain bound and on a store shelf away from the Post Office. Because of the Appeal there is confusion among the residents about what is happening and how it reflects on any actual closing which could occur and if there will be advance notice should closing take place.

We ask the Postal Regulatory Commission to hold in abeyance any intended action by the USPS to close the La Grande Post Office. It is also requested there be given ample notice, prominently displayed at the entry way and the location inside the store of the Post Office of the USPS intent regarding this matter.

Thank you for your consideration and action on this matter.

David Smith

Judi Smith

Judi Smith

Date 10/30/2011

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268

La Grande Post Office La Grande, Washington	Docket No. A2011-98

REQUEST TO WAIVER THE POSTAL REGULATORY COMMISSION'S
REQUIREMENT TO FILE ELECTRONICALLY
(October 27, 2011)

This filing is to request a waiver of the Postal Regulatory Commission's requirement to file electronically. The petitioner's attempts to access the online filing system were not successful.

Respectfully submitted,

David Smith & Judi Smith

David & Judi Smith

Attachment
7

This document faxed to PRC
on 10/27/11
This document and attached
letter (original of both)
mailed to PRC 10/28/11

PRC docket # 2011-98

10/28/2011

Secretary of the Commission
Postal Regulatory Commission
901 New York Avenue NW, suite 200
Washington, DC. 20268-0001

Re: Waiver Docket A 2011-98 Waiver for filing electronically

Dear Secretary,

The enclosed request for a waiver for filing electronically is the original signed document which was faxed to your office 10/27/2011. At the time of faxing it was not certain a faxed document would be accepted as appropriate means of transmittal requirements. This mailed version is intended only as a backup to insure appropriate requirements have been met.

After working with your staff person (Joyce) in Dockets, it is unlikely we will be able to resolve the electronic problems creating the need for this waiver in the time to meet the next deadline (11/2/11.)

Thank you for your review and action on this matter.

David Smith

Encl: Original signed waiver request