

Participant Statement

Before the Postal Rate Commission, Washington, DC 20268

In the matter of:

Oak Hill, AL 36766 Docket No: A2011-97

Mayor David Fuller, John Dale, Juliette H. Bullock, Petitioners

Petitioners are appealing the Postal Service's Final Determination concerning the Oak Hill, AL 36766 post office. The Final Determination was posted August 22, 2011.

We come again to state several issues that have not been successfully answered by the USPS and that concern us greatly.

Proposal: That a Hold Be Placed on the Closing of the Oak Hill, AL 36766.

We request such an action until our case can be fully investigated on the basis of material presented in this statement.

Reduced/Alternating Hours Offered

When we suggested reduced/alternating hours, the response was not applicable to the suggestion. See #4 concern and response in USPS Item #47, "Final Determination to Close."

Not only were fewer hours suggested, but both on the telephone with USPS officials in Birmingham and in our appeal dated September 19, we offered as few as three hours a day and closing one of the six days we are currently open. That would reduce our hours of operation from 31.5 hours/week to 15 hours/week, less than one-half the hours of operation now provided for customers.

Lease Reduction Offered

Furthermore, in our appeal and on the telephone with USPS officials, we have offered to reduce the amount paid by USPS to lease the building from \$3,650/year to \$1,000/year. That offer has not been answered. Has it been considered?

Ideal Location

This brings up another point, also made in Item #47 (see concern and response in #5) regarding our location at/in the intersection of two state highways. In the response, the USPS ignores the high visibility and ease of transactions from passersby but also the fact that many postal customers already receiving their mail on a rural route patronize the Oak Hill PO because it is closer and easier to use and they feel much more secure purchasing stamps and money orders in person rather than through a roadside mailbox.

Optimal Solution: Close Pine Apple PO, Consolidate at Oak Hill PO

We wonder why the USPS has decided to close the Oak Hill PO when it could as easily close the Pine Apple PO and consolidate both personnel and services here. Such things have happened in the past. Why not now? Oak Hill's route was taken a number of years ago when it was easily being operated out of a much smaller office. The Pine Apple PM could be moved to Oak Hill, as well as all services and routes. Oak Hill is much more centrally located in terms of routes traveled by the carriers. It is certainly a more visible PO than Pine Apple is. It is easier for the patrons of the McWilliams, AL, PO, which will be closed on November 18, to reach us than to travel to Pine Apple for boxed mail and for services. Why has this option not been considered? We know that USPS officials from Birmingham have seen the optimal location of the Oak Hill PO, but we do not understand why this has not been addressed by our stated concerns. Most of the responses are canned, saying the same thing to every concern and not addressing our highly desirable location. The building is spacious, on the same level as the highways, rather than a step or two up as Pine Apple's is, and thus easily accessible by disabled people, who do use our PO. We are thinking outside the box. Why can't the USPS? This proposed consolidation would not deprive any unionized personnel of a job. When the number of people who will be greatly inconvenienced by the closing of Oak Hill and McWilliams is combined, we believe that number will be greater than the number inconvenienced by the consolidating of the Pine Apple PO with Oak Hill.

Closings Hurt Rural Areas Most

Number 6 in Item #47 speaks of our concern for our patrons below the poverty and lowest literacy levels. These customers, primarily African-American, often need the help of PO personnel to fill in money orders and take care of additional postal concerns. In an oft-repeated response, the USPS addresses only part of the concern raised and does not speak to the fact that Wilcox County, in which the Post Offices named in this statement exist, is—according to the 2010 Census—72.5 percent African-American and has had the highest unemployment in the state. We have recently “improved” from 25 percent unemployment to 22 percent unemployment.

We note that the October 17 issue of *FBNews*, the official newspaper of the American Farm Bureau Federation, has an article on page 3 detailing the highly negative impact these PO closings will have on rural areas, such as ours, which have very few services as it is. Senator Susan Collins of Maine states, “The fact is, maintaining our nation's rural post offices costs the postal service less than 1 percent of its total budget and is not the cause of its financial crisis.” Later in the article, “more than 80 House members sent a letter to Postal Regulatory Commission Chairman Ruth Goldway cautioning that post office closures are not the way to solve USPS's money problems. The lawmakers noted that rural areas would be especially hurt.”

Relevant PRC Findings

The Studies of Social and Commercial Benefits of Postal Services: Economic Effects of Post Offices, which was commissioned and presented by the Postal Regulatory Commission, stresses that this study “is an initial step towards measuring the impacts of

post offices in communities.” Further down in the Introduction of the study is this statement: “Using several variants of our model, we found more variation in estimated impacts than we had hoped, but our results suggest a small, sometimes significant, negative impact on employment in the ZIP codes with post office closures.”

The study also states, on pages 5 and 6: “The outcome indicators in particular demonstrate the substantially different character of the closure ZIP codes. There is less variation by socio-economic characteristics, *although the closure ZIP codes tend to be substantially poorer*. While the steps described above to reduce the pool of the closure ZIP codes resulted in lower average numbers of employees and establishments, no difference is apparent in socio-economic characteristics. *Because both minorities and the elderly represent potentially vulnerable populations which could be disproportionately affected by the loss of an easily accessible postal facility*, it is encouraging that, in general, closures do not appear to be occurring in ZIP codes where these groups are concentrated.” [Ital. ours]

Under “Implications/Suggestions for Further Research” on page 10, this: “The results of this study do not provide conclusive evidence of economic impact, but they do suggest that future research on the relationship between post offices and business activity is warranted.”

More Study Needed Before Further Closings

We are rural, minority, impoverished, and elderly with low literacy, all of which is documented by US Census data. Why are such areas being targeted for closure, when there is clearly the need for more study on the apparently negative outcomes of PO closings in areas populated as ours is? None of the responses deals with these facts. The canned, glossy, oft-repeated answers given by the USPS are that “services provided at the Post Office will be available from the carrier, and customers do not have to travel to another Post Office for service” and “customers may place a lock on their mailboxes.”

Additional Questions

For Concern #15 of Item #47, the PO’s response is non-sensical. Does the response contain typos? If not, what does it mean?

In Concern #3, about half-way through Item #47, the PO’s hurried and canned responses are so evident that Oak Hill is called “Huxford.” Using Huxford for Oak Hill had been throughout an earlier printing of this document, which was recalled, so that Oak Hill could be dropped in where Huxford had been used. Doesn’t this illustrate the desperate rush to close whatever the USPS can, with little to any thought given to individual places and persons affected by these closings? We are unfortunate to be in the first, huge batch of 3,700 Post Offices slated to be closed. Will the next group receive better treatment than we have? Why has not Congress stepped in to address the great damage this massive number of closings is doing to the fabric of our nation?

In Concern #6, the response is to visit the USPS webpage for alternatives. Such a suggestion indicates a complete lack of understanding on the part of the USPS as to our

particular needs and problems. Most of the customers of Oak Hill's PO do not own a computer, and many do not know how to use one. The few who do own computers have to wait on dial-up access to get on the Internet. They might easily be able to be half-way to Pine Apple before the page comes up.

Concern #14 questions the economic savings of closing our PO. We have seen, at the end of Item #47, a savings of less than \$38,000 a year. How will that amount rescue the USPS? Our proposed reduction in hours and lease mentioned above would substantially lower our operating costs.

Concern #17 demonstrates again customers' concerns about receiving services from the carrier. A concern often mentioned is that of the security of roadside boxes. This concern is mentioned so often because of the high crime rate in this county. Can the USPS change the crime rate and thereby alleviate the concern of customers who cannot afford the fuel, time, or expense of keeping a box in Pine Apple? Of special note is the response to money orders, which the customer can purchase "by meeting the carrier at the mailbox." On cold, wet days, our elderly and disabled will hardly be able to do that. We have read of the customers' ability to contact the PO for hardship needs. There may be a number of such persons in our area.

Concern #18 asks for a USPS representative to represent the small Post Offices being closed. The response seems to indicate a number of organizations and unions which represent "employees within the Postal Service."

As to "Some advantages of the proposal are customers opting for carrier service will have 24-hour access to their mail (#2 in that list), we would appreciate an explanation of what that means. We have 24-hour access now with the PO here.

In "II. Effect on Community," Oak Hill is incorrectly called "an unincorporated community." We are incorporated, with a mayor and town council. Mayor David Fuller is one of the signees of our appeal. Oak Hill is called unincorporated even though Concern #1 just below this states that "Oak Hill is one of the oldest incorporated towns." The response seems to indicate that incorporation is of no significance to the USPS. We are not sure that this is true, but once again, this response and the incorrect labelling of the town as unincorporated indicates the hurriedness and "same song, second verse" nature of many of the responses, no matter the concerns raised.

Oak Hill is, according to a mileage sign in Pine Apple, 10 miles from Pine Apple. Is a 20-mile roundtrip for those who need Post Office (rather than carrier) services a cost-saving measure? It may be to the USPS, but it certainly is not to the people, especially our low-income and elderly, who will have to travel that distance.

A major irritation throughout the "review" process has been the inability to receive a list of criteria *uniformly applied* to all Post Offices being considered for closing. Nor have we received a USPS report containing all the relevant data for Wilcox County, AL, Post Offices, with some kind of rating or score added for each that would allow ranking of all

Post Offices in a geographical area. We believe the Oak Hill PO to be one of the most efficient and well-managed in our county, but without access to comparative data, we cannot make that case. Why are we not allowed to review the basis on which the decision was made to close the Oak Hill PO? Without criteria and data, we conclude that closing decisions are arbitrary, capricious, and based on hidden political maneuvering. We strongly believe that the decision to close our Post Office was made a long time before the first notification and that our input has meant nothing.

Conclusion

In closing, we ask that the PRC recommend to the USPS that our case be reviewed and the decision reversed. We have made a number of suggestions that have not been answered to keeping this Post Office open. Is it too late for all of these little towns? At best, are we fighting this hard to keep our Post Office open only to have to do so again when the next rounds of closings are released? *Please* consider the damage being done to these small, isolated, under-served areas—populated primarily by poverty-level, elderly minorities—by these “cost-saving measures.”

Thank you,

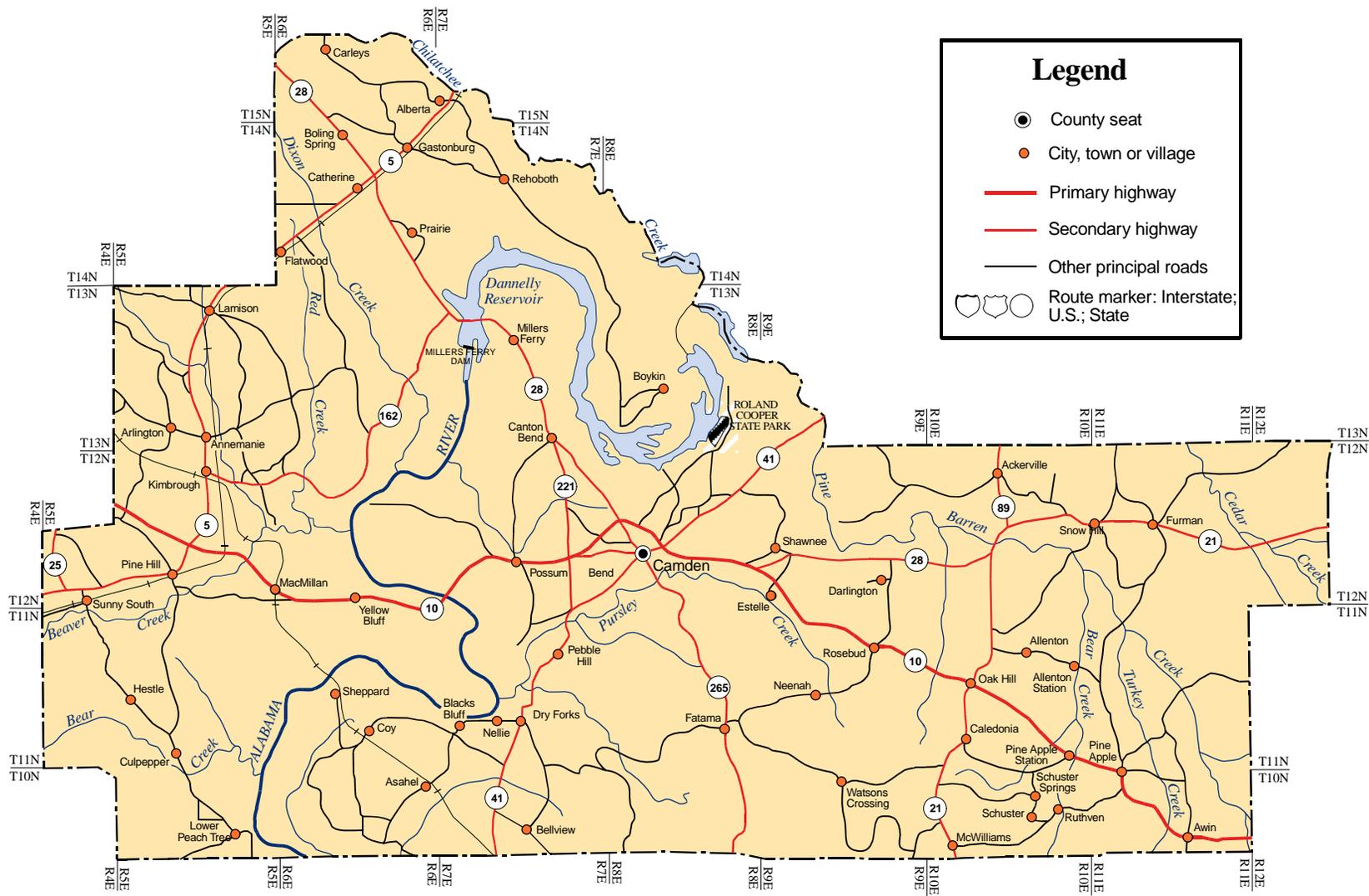
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Attached: map of Wilcox County. Please note eastern side of county and location of Oak Hill, McWilliams (south of Oak Hill), Pine Apple (east of Oak Hill), and Furman (NE of Oak Hill and supposedly in second round of closings, although we have heard it will not be closed because it has a PM).

WILCOX COUNTY



Legend

- County seat
- City, town or village
- Primary highway
- Secondary highway
- Other principal roads
- Route marker: Interstate; U.S.; State



Produced by the Dept. of Geography
College of Arts and Sciences
The University of Alabama

Population Key

BIRMINGHAM.....	100,000 to 500,000
Tuscaloosa.....	50,000 to 100,000
Gadsden.....	25,000 to 50,000
Albertville.....	5,000 to 25,000
Foley.....	1,000 to 5,000
Brilliant.....	500 to 1,000
Elkmont.....	up to 500