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POSTAL REGULATORY COMMISSION OFFICE OF THE SECRETARY

Office of PAGR

Postal Regulatory Commission
901 New York Avenue, NW
Suite 200
Washington, DC 20268-0001

Re: Protest closing of Mountain City, Nevada Post Office

On behalf of all the Mountain City, Nevada postal customers, we are writing to protest the closure of our post office.
Enclosed is a copy of Docket #1374123-89831. This document contains much misinformation, some of which are pertinent to the proposed closure.
ECONOMIC SAVINGS:

1. This section does not address additional costs that would rise from the carrier performing many of the tasks now done at the post office. The carrier will reportedly sell stamps and money orders. If there are not additional requirements for the carrier, such as bonding, it will still take additional time to finish the route. Neither additional cost has been included in the consideration.
2. The current OIC does not receive any benefits. This decreases the proposed savings by more than $8,300.00.
3. The current IOC's annual salary is nearly $7,000.00 less than stated. The economic savings is greatly overstated if the post office is closed. The Owyhee, Nevada post office has been named as the proposed Administrative Office. Owyhee is nearly 13 miles north of Mountain City, not 10 miles as reported in the Docket. Many of the Mountain City postal customers live south of the community, making their round trip to Owyhee, to the post office, up to 40 miles. There are no boxes available to rent in Owyhee. In fact, several of their "overflow" customers currently have postal boxes in Mountain City.

During the community on May 17, 2011, several questions were raised by the Mountain City postal customers:

Where will we have to go to pick up large packages?
Will we have house delivery at our own mail boxes; each of us having a roadside box that we install?
If we have cluster boxes, where will they be installed and who will install and maintain the cluster boxes and surrounding area?
The carrier is not a postal employee but will be handling money.
Post Office closures are not to be based on revenue generated as the

only reason for closure.
These questions and concerns have not been addressed to our satisfaction and as a result we request the commission extend the proposed closure date until these issues have been studied further.

PLEASE DO NOT CLOSE THE MOUNTAIN CITY POST OFFICE!

Signatures of postal customers of the Mountain City Post Office:

Please print name and sign below:

Louise Basañez	Louise T. Basañez
MELVIN J. BASAÑEZ	Melvin J. Basañez
Larry Monroe	[illegible]
Becky Goff	Becky Goff
[illegible]	Rebecca Hoover
Raleigh Brisbon	Raleigh Brisbon
Doreen Clifford	Doreen Clifford
Lee Chambers Box 280	Lee Chambers
Douglas K. Freeland	Douglas K. Freeland
Estella Morse	ESTELLA MORSE
Ronald Clifton	[illegible]
Velani Clifton	Gary Clifton
Bell Landon	Elizabeth Clifton
Peggy Landon	
Debbie Park	
Tony R Park	

Amber Koberstein	Amber Koberstein
Jasmine Koberstein	Jasmine Koberstein
Jerrold Koberstein	Jerrold Koberstein
John Vipham	[illegible]
Jessie Vipham	Jessie I Vipham
Sarah Vipham	Sarah Vipham
LARRY OTHEIM	Larry Otheim
Patricia Otheim	Patricia Otheim
Leatha Morse	Leatha Morse
Doug Morse	Douglas H Morse
GUS VITALE	Gus Vitale
Gerald Smith	Gerald Smith
Bill Boyer	Bill Boyer
Jackie Atkinson	Jackie Atkinson
Raft River Electric	[illegible]
Nolia Smart	Nolia Smart
Rex Goff	Rex Goff
James Penola	James Penola
Dennis R. Bieroth	Dennis R. Bieroth
Marcia Bieroth	Marcia Bieroth
Cameron Penola	
Alisia Penola	
BRIAN PENOLA	
Kenneth Hayecock	[illegible]

Date of Posting: 10/14/2011

Date of Removal: 11/15/2011

FINAL DETERMINATION TO CLOSE THE MOUNTAIN CITY, NV POST OFFICE AND CONTINUE TO PROVIDE SERVICE BY INDEPENDENT POST OFFICE

DOCKET NUMBER 1374123 - 89831

Response: The customer expressed a concern about the loss of the Communities' identity. 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 suspended Post Office name and ZIP Code in addresses and in the National Five-Digit ZIP Code and Post Office Directory.

3. **Concern:** Customers were concerned about growth in the community

Response: The customer expressed a concern about growth in the community. The growth of a community does not depend on the location of a post office. Based on information obtained by the Postal Service, it was determined that there has been minimal growth in the area in recent years. Carrier service will be able to accommodate future growth.

4. **Concern:** Customers were concerned about senior citizens

Response: The customer expressed a concern about senior citizens. Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this final determination will not adversely affect the community.

III. EFFECT ON EMPLOYEES

The postmaster position became vacant when the postmaster was promoted on August 30, 2008. The noncareer postmaster relief (PMR) may be separated from the Postal Service. No other Postal Service employee will be adversely affected.Since the postmaster vacancy an OIC has been installed to operate the office.

IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of $ 39,421 with a breakdown as follows:

Postmaster Salary (EAS-55, No COLA)	$ 24,885
Fringe Benefits @ 33.5%	$ 8,336
Annual Lease Costs	+ $ 6,200
Total Annual Costs	$ 39,421
Less Annual Cost of Replacement Service	- $ 0
Total Annual Savings	$ 39,421

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is issuing the final determination to close the Mountain City, NV Post Office and provide delivery and retail services by independent post office under the administrative responsibility of the Owyhee Post Office, located 10 miles away.

The postmaster position became vacant when the postmaster was promoted on August 30, 2008. Since the postmaster vacancy an OIC has been installed to operate the office. Postmaster level and office service hours are determined by a workload analysis which includes the number of deliveries and revenue.

The office was studied for possible closing or consolidation due to the following reasons: Decline in mail volume. We will continue to provide effective service through the Owyhee Post Office.

The Mountain City Post Office, an EAS-55 level, provides service from 08:30 to 13:30 Monday - Friday , 09:00 to 13:00 Saturday and lobby hours of 24/7 on Monday - Friday and 24/7 on Saturday to 30 post office box or general delivery customers and 13 delivery customers. Retail services included the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.

The retail window averaged 42 transaction(s) accounting for 46 minute(s) of retail workload daily. With minimal workload, the Postal Service feels that effective and regular service will be provided by independent post office. Office receipts for the last 3 years were: $5,911 (15 revenue units) in FY 2008; $4,645 (12 revenue units) in FY 2009; and $3,585 (9 revenue units) in FY 2010. There were no permit mailer(s) or postage meter customer(s).

On May 17, 2011, representatives from the Postal Service were available at the court house to answer questions and provide information to customers. 30 customer(s) attended the meeting.

On April 28, 2011, 43 questionnaires were distributed to delivery customers of the Mountain City Post Office. Questionnaires were also available over the counter for retail customers at the Mountain City Post Office. 15 questionnaires were returned. Responses regarding the proposed alternate service were as follows: 0 favorable, 4 unfavorable, and 11 expressed no opinion.

When this final determination is implemented, delivery and retail services will be provided by the Owyhee Post Office, an EAS-13 level office. Window service hours at the Owyhee Post Office are from 9 am to 1 pm 2 pm to 5 pm, Monday through Friday, and 10 am to 12 pm on Saturday. There are 10 post office boxes available.

The proposal to close the Mountain City Post Office was posted with an invitation for comment at the Mountain City Post Office and Owyhee Post Office from June 17, 2011 to August 18, 2011. The following additional concerns were received during the proposal posting period:

1. **Concern:** Customers expressed concern over the apparent lack of interest by the Postal Service for the needs of the community

   Response: The customer expressed a concern that the Postal Service exhibits a lack of interest in the mailing needs of the community. The Postal Service is required to provide each community with regular and effective service, using the most cost efficient means possible. The proposed alternate delivery service will meet the mailing and service needs of the community in a more cost effective manner.

2. **Concern:** Customers felt the post office should remain open since they paid taxes

   Response: The customer expressed a concern that since the people of your community paid taxes the post office should remain open. The Postal Service is not supported by tax dollars and must meet expenses by revenue it generates. Operational savings for the Postal Service contributes in the long run to stable postage rates and savings for customers.

3. **Concern:** Customers questioned the economic savings of the proposed discontinuance. Concern was also expressed that too much money was spent in the larger cities

   Response: The customer expressed a concern about the economic savings of the proposed discontinuance. Concern was also expressed that too much money was spent in the larger cities. 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 of approximately totalsavings. Additional funds are necessary in larger cities because of a greater workload. Larger cities often realize greater revenue which can offset their greater expenses.

4. **Concern:** Customers were concerned about a change of address

Response: The customer expressed a concern about a change in address. Customers will be assigned a 911 address. The new address will continue to use the community name and ZIP Code. Mail will be forwarded in accordance with postal regulations, and change of address forms are available from the Postal Service to assist customers in notifying correspondents of the change.

5. **Concern:** You were concerned about having to travel to another post office for service

Response: The customer expressed a concern about having to travel to another post office for service. Services provided at the post office will be available from the carrier, and customers will not have to travel to another post office for service. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience.

6. **Concern:** Customers expressed a concern about irregular hours that the rural route serves the community

Response: The customer expressed a concern about irregular hours that the rural route serves the community. Our carriers strive to provide service at approximately the same time on a daily basis, however mail volumes and weather conditions often effect delivery times. If you desire special services from the rural carrier you may leave a note in your mailbox instructing the carrier to sound his horn, and then meet the carrier to receive services. Retail services may also be obtained at the administrative post office located _____ miles away.

7. **Concern:** Customers expressed concern over the dependability of rural route service

Response: The customer expressed a concern over the dependability of rural route service. Rural letter carriers perform a vital function in the United States Postal Service serving thousands of families and businesses in rural and suburban areas while traveling millions of miles daily. Rural letter carriers are highly respected by the American public. This respect has been earned by many years of dedication to the Postal Service and to postal customers. During national and local emergencies, including prolonged periods of extreme weather conditions, rural carriers have demonstrated great responsibility in providing mail service to postal customers. Rural carriers are required to serve the route expeditiously and arrive at boxes at about the same time each day.

8. **Concern:** Customers felt inclement weather and poor road conditions might impede delivery

Response: The customer expressed a concern about inclement weather and poor road conditions, that this might impede delivery. Both inclement weather and heavy mail volume can cause deviations from the normal delivery schedule. However, the carrier is required to provide a vehicle of adequate size, equipped with necessary equipment (chains or snow tires, warning lights or signs, etc.) to serve the route safely and efficiently and in accordance with federal, state, and local motor vehicle laws and regulations.

9. **Concern:** Customers inquired about mailbox installation and maintenance

Response: The customer expressed a concern about mailbox installation and maintenance. Customers are responsible for mailbox installation and maintenance. Mailboxes must be placed so that they may be safely and conveniently served by the carrier and must be located on the right-hand side of the road in the direction of the carrier's travel. Mailbox supports should conform to state laws and highway regulations. The Postal Service recommends that customers contact the administrative postmaster or carrier for advice on placement of mailboxes and mailbox height and supports.

10. **Concern:** Customers questioned the economic savings of the proposed discontinuance

Response: The customer questioned the economic savings of the proposed discontinuance. Carrier service is more cost-effective than maintaining a postal facility and postmaster position. The Postal Service estimates an positive annual savings.

11. **Concern:** Customers wanted the post office to stay the same. Customers said the CPO would be a disservice to the community

Response: The customer expressed a concern about the establishment of a Community Post Office (CPO). The CPO will be contracted to provide at least the same hours as the present post office. Depending on the location, the CPO may provide extended lobby hours. A CPO provides the same services as the suspended Post Office, except for permit mail acceptance.

12. **Concern:** Customers were concerned about having to travel to another post office for service

Response: The customer expressed a concern about having to travel to another post office for service. Services provided at the post office will be available from the carrier, and customers will not have to travel to another post office for service. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience.

13. **Concern:** Customers were concerned about obtaining accountable mail and large parcels

Response: The customer expressed a concern about obtaining accountable mail and large parcels. If you live less than one-half mile from the line of travel, the carrier will attempt delivery of accountable items and large parcels to the customer's residence. If the live over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox. Large parcels will be left outside the mailbox or at a designated location or a notice will be left in the mailbox. Attempted delivery items will be taken back to the administrative Post Office. Customers may pick up the item at the post office, request redelivery on another day or authorize delivery to another party.

14. **Concern:** Customers were concerned about obtaining services from the carrier

Response: The customer were concerned about obtaining services from the carrier, retail services provided at the post office are available from the carrier. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Listed below are some services available from the carrier and how to obtain them.

PURCHASING STAMPS BY MAIL
The Stamps by Mail Program provides customers the opportunity to purchase stamps, envelopes, and postal cards by using Form 3227-R, Stamp Purchase Order (Rural), available from the post office or the carrier. Commemorative stamps and stamp collecting products are also available. The customer addresses the postage paid order form envelope, encloses payment by personal check or postal money order made payable to the US Postal Service, and mails the form (postage-free) or leaves it in the mailbox for the carrier to pick up. Most orders are processed overnight, and some immediately.

PURCHASING POSTAL MONEY ORDERS
Customers may purchase money orders by meeting the carrier at the mailbox, completing an application, and paying the carrier (in cash) the price of the money order, plus the fee. The carrier gives the customer a receipt for the application. The money order is completed when the carrier returns to the post office, and a money order receipt is left in the customer's mailbox on the next delivery day. Most customers provide the carrier with a stamped, self-addressed envelope in which the completed money order is mailed to its destination. If customers prefer, the completed money orders will be returned for verification on the next delivery day.

SPECIAL SERVICES

Special services such as certified, registered, Express Mail, delivery confirmation, signature confirmation, and COD may be obtained from the carrier by leaving a note in the mailbox, along with the appropriate payment. The carrier will provide the services that day and leave a customer receipt in the mailbox on the next delivery day.

HOLDING MAIL
Customers who will be away for an extended time, such as a vacation, may request that their mail be held at the post office during their absence. Upon return the customer asks the post office to resume delivery.

Some advantages of the proposal are:

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUs can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

Taking all available information into consideration, the Postal Service concludes this final determination will provide a maximum degree of effective and regular postal services to the community.

II. EFFECT ON COMMUNITY

Mountain City is an unincorporated community located in ELKO County. The community is administered politically by Town Council. Police protection is provided by the Elko NV Police Dept. Fire protection is provided by the Mountain City Fire Dept. The community is comprised of Most customers are retired, farmers and ranchers. and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Mountain City Bar & Restaurant & Motel, Rio Tinto Mining Office, Court House, CenuryTel Office, Chambers Motel, Visitor Center, Raft River Electric Company, Headquarters for Wildlife Mitigation Program, Volunteer Fire Department . Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Mountain City Post Office will be available at the Owyhee Post Office. Government forms normally provided by the Post Office will also be available at the Owyhee Post Office or by contacting your local government agency.

The following nonpostal concerns were expressed from questionnaires, the community meeting, on the petition, and on the congressional inquiry:

1. **Concern:** Customers were concerned about having to travel to another Post Office for service.

   Response: Services provided at the Post Office will be available from the carrier, and customers will not have to travel to another Post Office for service. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. Stamps are also available at many stores and gas stations where customers may already shop, online at usps.com, or by calling 1-800-STAMP-24.

2. **Concern:** Customers expressed concern for loss of community identity

VI. SUMMARY

This is the final determination to close the Mountain City, NV Post Office and provide delivery and retail services by independent post office under the administrative responsibility of the Owyhee Post Office, located 10 miles away.

The postmaster was promoted on August 30, 2008. If the office has a noncareer PMR(s), they may be separated from the Postal Service; however, attempts will be made to reassign the employee(s) to a nearby facility. No other employee(s) will be adversely affected. The workload has declined. Effective and regular service will continue to be provided by independent post office.

The Mountain City Post Office provided delivery and retail service to 30 PO Box or general delivery customers and 13 delivery route customers. The daily retail window transactions averaged 42. There are no permit mailers or postage meter customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated $39,421 annually. A disadvantage to some will be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

VII. NOTICES

A. Support Materials. Copies of all materials upon which this final determination is based are available for public inspection at the Mountain City Post Office and Owyhee Post Office during normal office hours.

B. Appeal Rights. This final determination to close the Mountain City Post Office may be appealed by any person served by that office to the Postal Regulatory Commission at 901 New York Ave NW, Suite 200, Washington DC 20268-000l. Appeals must be received by the Commission within 30 days of the date this final determination is posted. If an appeal is filed, copies of appeal documents prepared by the Postal Regulatory Commission or the parties to the appeal will be made available for public inspection at Mountain City Post Office and Owyhee Post Office during normal office hours.

10/07/2011

Dean J Granholm
Vice President of Delivery and Post Office Operations

Date