

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Auburn Post Office
Auburn, West Virginia

Docket No. A2011-94

REPLY BRIEF OF THE PUBLIC REPRESENTATIVE

December 8, 2011

On September 28, 2011, the Commission received a petition to review the Postal Service's decision to close the Auburn Post Office in Auburn, West Virginia (Auburn post office).¹ On September 30, 2011, the Commission issued Order No. 887, which institutes the current review proceeding, appoints a Public Representative, and establishes a procedural schedule.² In accordance with Order No. 887, the Postal Service filed the administrative record for the closing.³ The Petitioner filed a Participant's Statement.⁴ The Postal Service filed comments concerning the appeal.⁵

The Public Representative's Reply Brief is written to bring several issues to the attention of the Commission to better inform the Commission in completing its review.

The record indicates the Auburn post office had 47 post office box customers. Administrative Record, Item Nos. 1, 9, 13, 15, 47. The record also indicates that the alternative Troy post office only has 37 available post office boxes. *Id.*, Item No. 47.

¹ Petition for Review received from the Auburn Town Council, Save the Auburn Post Office Committee regarding the Auburn, WV Post Office 26325, September 28, 2011 (Petition).

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, September 30, 2011 (Order No. 887).

³ United States Notice of Filing, October 13, 2011, and United States Notice of Filing, November 14, 2011 (Administrative Record). The Final Determination appears as item 47 of the Administrative Record.

⁴ Comments Received from Save the Auburn Post Office Committee, November 1, 2011.

⁵ United States Postal Service Comments Regarding Appeal, November 22, 2011 (Postal Service Comments).

The Postal Service assumes that not all Auburn post office box customers will want to rent boxes at the Troy post office. Postal Service Comments at 7-8. This is consistent with the Postal Service's apparent inclusion of highway contract route service for all 47 post office box customers. Administrative Record, Item No. 15 at 2. The Public Representative would find it more assuring if the Postal Service would guarantee post office box service to all Auburn box customers that wanted to continue post office box service at the Troy post office. This would promote the provision of effective and regular postal services.

The Final Determination indicates the postmaster retired on January 30, 2010. *Id.*, Item No. 47. The Postal Service also indicates that the Auburn post office has been run using the postmaster relief program for 16 years. *Id.*, Item No. 15 at 1. In any event, the calculation of economic savings based upon a postmaster salary, and not the actual salary of the OIC, remains problematic and likely inflates any economic benefit that the Postal Service will realize by closing this office. The economic benefit further assumes that the OIC will be terminated and not reassigned.

The Postal Service's Final Determination to close the Auburn post office appears procedurally in order. Aside from the potential limited availability of post office boxes at the Troy post office, and concerns that the Postal Service will not realize the cost savings it estimates, the Public Representative concludes that no persuasive argument has been presented which would prevent the Commission from affirming the Postal Service's determination to close the Auburn post office.

Respectfully submitted,

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