

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

Bloomington Post Office  
Bloomington, Idaho

Docket No. A2012-2

REPLY BRIEF OF THE PUBLIC REPRESENTATIVE

December 8, 2011

On October 5, 2011, the Commission received two petitions to review the Postal Service's decision to close the Bloomington post office in Bloomington, Idaho (Bloomington post office).<sup>1</sup> On October 7, 2011, the Commission issued Order No. 898, which institutes the current review proceeding, appoints a Public Representative, and establishes a procedural schedule.<sup>2</sup> In accordance with Order No. 898, the Postal Service filed the administrative record for the closing.<sup>3</sup> Petitioner Thornock filed a Participant's Statement.<sup>4</sup> The Commission also received a letter from Nada Jean Thomas, retired postmaster.<sup>5</sup> The Postal Service filed comments concerning the appeal.<sup>6</sup>

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<sup>1</sup> Petition for Review received from Dale Thornock regarding the Bloomington, ID Post Office 83223, October 5, 2011; Petition for Review received from Kelly & Julie Payne regarding the Bloomington, ID Post Office 83223, October 5, 2011 (Petitions).

<sup>2</sup> Notice and Order Accepting Appeal and Establishing Procedural Schedule, October 7, 2011 (Order No. 898).

<sup>3</sup> United States Notice of Filing, October 19, 2011 (Administrative Record). The Final Determination appears as item 47 of the Administrative Record.

<sup>4</sup> Participant Statement received from Dale Thornock regarding the Bloomington, ID Post Office 83223, November 7, 2011; see *also* Letter received from Dale Thornock regarding the Bloomington, ID Post Office 83223, October 13, 2011 (Thornock Participant Statement).

<sup>5</sup> Letter regarding the Bloomington, ID Post Office 83223-0180, October 18, 2011.

<sup>6</sup> United States Postal Service Comments Regarding Appeal, November 28, 2011 (Postal Service Comments).

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 Bloomington post office had 104 post office box customers. Administrative Record, Item Nos. 1, 8, 9, 13, 15, 47. The record further indicates that nearby Paris post office only has 59 available post office boxes, and Montpelier post office has 22 available post office boxes. *Id.*, Item No. 47. Combined, the two post offices cited by the Postal Service do not have enough post office boxes available if all 104 Bloomington post office box customers continue to want this service.

It would be reasonable to assume that some customers will opt for highway contract service, including delivery to cluster box units. However, the Public Representative would find it more assuring if the Postal Service would guarantee post office box service to all Bloomington box customers that wanted to continue post office box service at nearby post offices. This would promote the provision of effective and regular postal services.

The Final Determination indicates the postmaster retired on June 30, 2010. *Id.*, Item No. 47. 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 has provided no guidance on how far, in time and distance, is too far to expect customers to travel in order to obtain effective and regular postal services. In this instance, the administrative responsibility for providing postal services lies with the Montpelier post office which is located 12 miles away. It is unclear whether customers will have to travel this distance to pick up packages that the carrier was unable to deliver. Fortunately, the Paris post office is only 2 miles away for obtaining most other postal services. The Public Representative suggests that the Commission require the Postal Service to disclose its standards on time and distance. If the Postal Service is unable or unwilling to provide this information, it may be time for the Commission to establish standards on its own for evaluating this issue.

The Postal Service's Final Determination to close the Bloomington post office appears procedurally in order. Aside from the potential limited availability of post office boxes at nearby post offices, 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 Bloomington post office.

Respectfully submitted,

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