

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:

Saratoga Post Office
Saratoga, Arkansas 71859
(Dale Gathright, Jr. and Nelson and Linda
Wheatley, Petitioners)

Docket No. A2012-21

UNITED STATES POSTAL SERVICE COMMENTS REGARDING APPEAL
(December 12, 2011)

On October 18, 2011, the Commission docketed correspondence from Dale Gathright as an appeal of the Final Determination to discontinue the Saratoga, Arkansas Post Office. On October 24, 2011, the Commission issued Order No. 925 in this docket. On November 2, 2011, the Commission docketed correspondence from Nelson and Linda Wheatley objecting to the Final Determination to discontinue the Saratoga, Arkansas Post Office. In accordance with Order No. 925, the administrative record was filed with the Commission on November 2, 2011. The Commission received additional correspondence from several concerned citizens on November 17, 2011. On November 28, 2011, Petitioner Dale Gathright, Jr. filed a Form 61, Participant Statement, in support of the petition.¹

The initial correspondence and the Participant Statement received by the Commission in this docket raise two main issues: (1) the effect on postal services and (2) the impact upon the Saratoga community. As reflected in the administrative record

¹ Participant Statement Received from Dale Gathright, Jr., PRC Docket No. A2012-21 (November 28, 2011).

of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,² the Postal Service gave consideration to a number of other issues, including the economic savings and the effect on employees. Accordingly, the Final Determination to Close the Saratoga, AR Post Office and Continue to Provide Service by Rural Route Service should be affirmed.

Background

The Final Determination to Close the Saratoga, AR Post Office and Continue to Provide Service by Rural Route Service (Final Determination), as well as the administrative record, indicate that the Saratoga Post Office provides EAS-13 level service 37.75 hours per week to retail customers and 257 delivery customers. Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet (Fact Sheet), at 1.³ The postmaster position at the Saratoga Post Office became vacant when the postmaster resigned on January 8, 2011. *Id.* Since that time, a noncareer postmaster relief employee has been installed to operate the Saratoga Post Office. Item No. 41, Proposal to Close the Saratoga, AR Post Office and Continue to Provide Service by Rural Route Service (Revised) (Revised Proposal), at 7.

The average number of daily retail window transactions at the Saratoga Post Office is 14.80. Item No. 13, Fact Sheet, at 1. Revenue has generally declined since 2008: \$19,414 (51 revenue units) in FY 2008, \$18,204 (47 revenue units) in FY 2009

² See 39 U.S.C. 404(d)(2)(A).

³ In these comments, specific items in the administrative record are referred to as "Item No. ____."

and \$18,698 (49 revenue units) in FY 2010. Item No. 41, Revised Proposal, at 2. The Saratoga Post Office has no meter or permit customers. Item No. 13, Fact Sheet, at 1.

Upon implementation of the Final Determination, delivery and retail services will be administered by the Columbus Post Office, an EAS-55 level Post Office, and through rural route service. Item No. 41, Revised Proposal, at 2. Customers may elect to continue Post Office box service at the Columbus Post Office, or receive delivery and retail service through rural route service to roadside mailboxes located close to customers' residences. See Item No. 25, Postal Service Customer Community Meeting Analysis, at 1; Item No. 41, Revised Proposal, at 3.

The Postal Service followed the proper procedures leading up to the posting of the Final Determination, considered and addressed the issues raised by the customers of the Saratoga Post Office, and complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. On June 8, 2011, questionnaires were distributed to delivery customers and made available to retail customers of the Saratoga Post Office. Item No. 23, Postal Service Customer Questionnaire Analysis, at 1. The returned customer questionnaires and Postal Service response letters appear in the administrative record at Item No. 22, pages 4-72. On June 23, 2011, representatives from the Postal Service attended a community meeting at the Saratoga School, where they answered questions and provided information to customers. Item No. 24, Community Meeting Roster, at 1. Customers received formal notice of the Proposal and Final Determination, as well as the right to appeal the Final Determination, through postings at the Saratoga Post Office

and nearby facilities. Item No. 33, Proposal (reflecting posting at the Saratoga Post Office); Administrative Record, Final Determination, at pg. 244 (reflecting posting at the Saratoga Post Office); Administrative Record, Final Determination, at pg. 250 (reflecting posting at the Columbus Post Office).

In light of the postmaster vacancy,⁴ minimal workload, a reduction in office revenue,⁵ the variety of delivery and retail options (including the convenience of rural delivery and retail service),⁶ minimal impact upon the community, and the expected financial savings,⁷ the Postal Service issued the Final Determination. Regular and effective postal services will continue to be provided to the Saratoga community in a cost-effective manner upon implementation of the Final Determination.

Each of the issues raised by the Petitioners is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii), and as addressed throughout the administrative record, the Postal Service considered the effect of discontinuing the Saratoga Post Office on postal services provided to Saratoga customers. The discontinuance is premised upon providing regular and effective postal services to Saratoga customers.

Petitioners raise the issue of the effect on postal services of the Saratoga Post Office's closing, noting the convenience of the Saratoga Post Office and requesting its

⁴ See Item No. 13, Fact Sheet, at 1.

⁵ See *id.*

⁶ See Item No. 41, Revised Proposal, at 3.

⁷ *Id.* at 7.

retention. They express particular concern about the need to travel to the Columbus Post Office for service. The effect of the Saratoga Post Office's discontinuance on the availability of postal services to Saratoga residents was considered extensively by the Postal Service. Item No. 41, Revised Proposal, at 2-5. Services provided at the Post Office, such as the sale of stamps, envelopes, postal cards, and money orders, will also be available from the carrier to roadside mailboxes located close to customers' residences. *Id.* Various options exist for obtaining postal services, which are explained on usps.com. In addition to carrier service, customers may opt for Post Office Box service at the Columbus Post Office, or use alternate access options, including usps.com and Stamps By Mail®. The window service hours of the Columbus Post Office are from 8:30 a.m. to 2:30 p.m., Monday through Saturday. Item No. 13, Fact Sheet, at 1. In addition, customers opting for carrier service will have 24-hour access to their mail. Item No. 41, Revised Proposal, at 5.

Petitioners question the convenience of the Columbus Post Office. The Postal Service noted this concern in the record. Item No. 41, Revised Proposal, at 2. Ultimately, the Postal Service concluded that the Saratoga community would continue to receive regular and effective service through the Columbus Post Office and alternate access options, including rural route service and usps.com and Stamps By Mail®.

Petitioners express concern about mailing packages and accountable mail. In the letter to customers that accompanied the initial investigation questionnaires, as well as in the Proposal and Final Determination, the Postal Service explained that with respect to retail services currently provided at the Saratoga Post Office, such services

will be available from the carrier, so that customers will not have to travel to another Post Office for service. Item No. 21, at 2; Item No. 41, Revised Proposal, at 2; Administrative Record, Final Determination, at 245. In addition, the Postal Service advised customers that many postal services are now available online or through Stamps by Mail®. Item No. 41, Revised Proposal, at 3. With respect to the delivery of accountable items or large parcels to rural delivery customers who live less than one-half mile from the line of travel, it is the Postal Service's common practice for the carrier to attempt delivery of accountable items and large parcels to the customer's residence. If the rural delivery customer lives over one-half mile away from the line of travel 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 location designated by the customer (if authorized by the customer), or a notice will be left in the mailbox. Attempted delivery items will be taken back to the Post Office. Customers may pick up the item at the Post Office or request redelivery online at usps.com or by calling 1-800-ASK-USPS.

Petitioners state that the Columbus Post Office is housed in a building with insufficient space, and they question whether the Columbus Post Office has the capacity to accommodate new customers from the Saratoga community. Although not raised in the record, the discontinuance coordinator has confirmed that the Post Office Boxes located at the Saratoga Post Office will be moved to the Columbus Post Office, providing the Columbus Post Office with a sufficient number of Post Office Boxes available for use by Saratoga customers.

Petitioners express concern for the impact on the school, and challenge whether the proposed post-discontinuance method of service can handle the large volume of sensitive and confidential mail sent and received by the school. As explained by the Postal Service, rural carriers have earned a reputation for trustworthiness and have demonstrated their ability to handle sensitive and confidential mail in a secure manner. Item No. 40, Analysis of 60-day Posting Comments, at 1. Regular and effective postal service will always be provided to the school, and to the entire Saratoga community. *Id.*

The Postal Service has considered the impact of discontinuing the Saratoga Post Office upon the provision of postal services to Saratoga customers. Delivery and alternate access options provide Saratoga customers with similar access to retail service, alleviating the need to travel to the Post Office. Item No. 41, Revised Proposal, at 2. Thus, the Postal Service has properly concluded that Saratoga customers will continue to receive regular and effective service.

Effect on the Saratoga Community

The Postal Service is obligated to consider the effect of its decision to discontinue the Saratoga Post Office upon the Saratoga community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to discontinue a Post Office.

Saratoga is an unincorporated community located in Howard County. Item No. 41, Revised Proposal, at 2. The Howard County Sheriff's Office provides police

protection, and the Saratoga Volunteer Fire Department provides fire protection. *Id.* In general, Saratoga residents must travel elsewhere for many supplies and services. See Item No. 22, Customer Questionnaire Responses.

Petitioners' appeal raises the issue of the effect of the discontinuance of the Saratoga Post Office upon the Saratoga community. This issue was extensively considered by the Postal Service, as reflected in the administrative record. Item No. 41, Revised Proposal, at 2-6. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name. *Id.* Communities generally require regular and effective postal services, and these will continue to be provided to the Saratoga community.

Petitioners express a concern about the Postal Service's consideration of the Saratoga Post Office discontinuance's effect on businesses in the community. In particular, the Petitioners state that there are a number of home and farm businesses in the community.⁸ The Postal Service considered this issue, and found no indication that the discontinuance would have an adverse effect on businesses in the Saratoga community. Item No. 41, Revised Proposal, at 5. In responses to questionnaires, customers indicated that even if the Saratoga Post Office was discontinued, they would continue to patronize local businesses. *Id.*

⁸ Petitioners do not offer any specifics on any home and farm businesses that were not listed in the PO Survey Sheet. Nevertheless, presumably those business owners had opportunities to provide input through the survey forms and solicitation for comment. Moreover, the revenue at the office indicates very light business activity in general, and thus the impact on these businesses should not be significant. See Item No. 41, Revised Proposal, at 2.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of discontinuing the Saratoga Post Office on the community served by the Saratoga Post Office.

Economic Savings

Postal Service officials properly considered the economic savings that would result from the proposed discontinuance, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that administering delivery service emanating from the Columbus Post Office would cost the Postal Service substantially less than maintaining the Saratoga Post Office, and would still provide regular and effective service. The amount of the estimated annual savings associated with discontinuing the Saratoga Post Office is \$51,129.00. Item No. 41, Revised Proposal, at 7.

The Postal Service determined that the provision of delivery and retail service through the Columbus Post Office is more effective than maintaining the Saratoga postal facility and postmaster position. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a discontinuance, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The postmaster resigned on January 8, 2011. Item No. 13, Fact Sheet, at 1. Although the

noncareer postmaster relief (PMR) may be separated from the Postal Service upon implementation of the Final Determination, the record shows that no other employee would be affected by this discontinuance. Item No. 41, Revised Proposal, at 7. Accordingly, in making the Final Determination, the Postal Service considered the effect of the discontinuance on the employees of the Saratoga Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of discontinuing the Saratoga Post Office on the provision of postal services and on the Saratoga community, as well as the effect on postal employees, the economic savings that would result from the proposed discontinuance and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Saratoga customers. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record, and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). Accordingly, the Postal Service's decision to discontinue the Saratoga Post Office should be affirmed.

The Postal Service respectfully requests that the Final Determination to discontinue the Saratoga Post Office be affirmed.

Respectfully submitted,

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