

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

Ruth Mississippi Post Office
Ruth, Mississippi 39662

Docket No. A2012-12

PUBLIC REPRESENTATIVE'S REPLY COMMENTS

(December 22, 2011)

I. INTRODUCTION

This case addresses an appeal of the Postal Service's decision to close the Ruth Mississippi Post Office and provide the former patrons of that office with delivery and retail service via rural route under the administration of the Jayess post office, located 8 miles away.¹

Ruth is an unincorporated community in Lincoln County, Mississippi. It is about 75 miles from Jackson, the state capital. Veronica Boyd, a patron who responded to the questionnaire the Postal Service distributed to the community, provides this interesting personal perspective:

... the Ruth Post Office was organized in 1892 by my paternal grandmother (Emma Felder) & was named for her sister, my great-aunt (Ruth Felder).

Administrative Record, Item No. 21 at 4 (comment of Veronica Boyd).

¹ Petition of Bonnie Ard, filed October 13, 2011 (Ard Petition). Commission Order No. 911, which accepted the Ard Petition, was published at 76 FR 66337 (October 26, 2011). See also Participant Statement of Bonnie Ard, November 14, 2011, in which Ms. Ard provides additional details, observations, and arguments.

II. APPLICABLE LAW

The Commission is aware of the standards that apply to its review of appeals of post office closing decisions. These Reply Comments therefore incorporate by reference the recitation of standards and law in Commission Order No. 974 at 6 (Part V) in Docket No. A2011-34, Innis, Louisiana.

III. CURRENT POSTAL OPERATIONS IN RUTH

The following table, developed from documents in the Administrative Record, presents selected data and information about current Ruth Post Office operations.

Table 1
Ruth Mississippi Post Office
Selected Operational Data and Information

EAS Level	13	
Staffing		
Postmaster Position	Vacant since postmaster's retirement on May 1, 2011	
Officer in Charge	Noncareer; may be separated or reassigned	
Customers		
P.O. Box or General Delivery	39	
Rural Delivery Customers	573	
Meter or Permit Customers	1	
Retail Operations		
Days of Operation Monday through Friday?	Yes	
Window Service Hours	Morning	7 a.m. to 12 noon
	Afternoon	1 p.m. to 3:45 pm
Lobby Hours	7 a.m. to 3:45 p.m.	
Saturday?		
Window Service Hours	No	
Lobby Hours	7 a.m. to 9:15 a.m.	
Seasonal Workload?	No	
Average daily retail window transactions/daily workload	7 transactions/ 6 minutes	
Bulletin Board	Yes	

Source: Adapted from AR, Item Nos. 15 and 18.

The next table identifies revenue trends. As the table shows, revenue has declined over the past several years, but the falloff has not been dramatic. Moreover, some of the decline may be due to continuing effects of the Nation's overall economic condition, and not indicative of the long-term situation.

Table 2
Ruth Post Office Revenue Trends

Year	Amount (in \$)
FY 2008	26,061
FY 2009	25,607
FY 2010	23,371

Source: Administrative Record, Item No. 48 (Final Determination)
(Section I, para. 5).

IV. THE INTERESTS OF THE GENERAL PUBLIC

The interests of the general public in “A” cases typically involve due process considerations, such as the Postal Service’s compliance with procedural requirements; the soundness of the Administrative Record; the transparency of the Postal Service’s decisionmaking process; and responsiveness to patrons’ concerns.

The Administrative Record. In this case, more than 500 persons signed a petition opposing the Postal Service’s decision to close the Ruth Post Office. Regrettably, as Petitioner Ard notes, the Final Determination, as originally filed, states there were only 10 signatures. She explains, however, that residents “volunteered nights and weekends, went door to door to get petitions signed, [and] 504 of the 581 residents signed this petition.” Ard Petition at 1. Ms. Ard adds that the petition was sent via Priority Mail with confirmation service so there would be no confusion, but says someone in the office lost all but two sheets of the packet.² *Id.*

Petitioner Ard’s reaction to the Postal Service’s loss of the bulk of the signatures on the patrons’ petition is understandable. Residents went to considerable lengths to demonstrate the depth and breadth of their opposition to the Postal Service’s plan. The Postal Service later supplied the missing signatures for the record, but Ms. Ard’s concern is that the decision to close was based on an assumption that extremely few

² Ms. Ard offers additional observations about the Postal Service’s handling of the patrons’ petition in her Participant Statement. See Participant Statement at 1-2.

patrons (just 10) were opposed to the closing.³ It is not clear how inclusion of the correct number would have influenced the Postal Service, but the difference between the two figures (10 versus 504) is significant. It seems, based on supplemental filings in this and other recent cases, the Postal Service is taking steps to address deficiencies in the preparation of administrative records. The error Petitioner Ard identifies indicates that continued Headquarters attention to the soundness of the record would be useful.

Economic savings. The Postal Service's estimate reflects its conventional approach, which includes the salary and benefits for a Postmaster, rather than an OIC, and omits an amount for continuation of the OIC's salary. However, there does not seem to be an estimate for the cost of replacement service. Instead, the Final Determination, Section IV., identifies the replacement cost as zero. This is apparently based on information presented in AR Item No. 17, Rural Route Cost Analysis, which also indicates a cost of zero for replacement service.

This result may be due to the possibility that the cost of replacement service can be easily absorbed, as there would only be 22 new stops, assuming all affected patrons opt for rural carrier service. The Post Office Survey Sheet, for example, notes that the change will not result in the route being overburdened, nor will it affect delivery time. Administrative Record, Item No. 15 at 2. It would be useful if the Postal Service were more explicit.

Decisionmaking transparency—why is this office being closed? Petitioner Ard questions why the Ruth post office was proposed for closure. She observes: "Of all the Post Offices proposed for closure Ruth Ms 39662 is the only one on a main highway, all others are tucked away on a road to nowhere." Petition at 1. She claims Ruth captures revenue from Tylertown, Jayess, Monticello, Bogue Chitto, Summit and Brookhaven, and is the only post office people actually pass on the way to town. *Id.* Moreover, she asserts there has been growth in Ruth over the past 19 years (averaging 12 new customers per year) and that mail volume in Ruth has not declined. *Id.* Ms. Boyd also indicates that she would be less like to use the Jayess Post Office due to distance, and

³ United States Postal Service Notice of Filing Corrected Administrative Record-[Errata], November 29, 2011. The Postal Service also supplied other documentation that was omitted in the original filing.

more likely to patronize Summit or Brookhaven. Administrative Record, Item No. 21 at 4.

As the Postal Service knows, Petitioner Ard's inquiry about why the Postal Service has chosen to close the Ruth post office, despite what she sees as this office's clear advantages over others, echoes a question posed by patrons in many of the cases appealed to the Commission. In addition, in this case, patrons' responses to questionnaires clearly indicate that they typically go to places *other than* Jayess when they leave Ruth; thus, the record the Postal Service has developed through its questionnaire process demonstrates that the Petitioner Ard's inquiry has a sound basis. While patrons' personal preferences and mere inconvenience cannot dictate the Postal Service's decisions, it seems appropriate to give consideration to some local distinctions, such as a facility's location on a main road, and dominant local patterns of travel to other communities for business and personal needs.

The Postal Service typically provides a "macro" level response about its overall financial condition to these "micro" level inquiries. This leaves patrons frustrated and dissatisfied. The Postal Service's decision, even if driven by a major institutional policy, has an immediate and direct local impact. Patrons assume that their question bears directly on "the effect on the community" and "the effect on postal services". It would be useful if the Postal Service were more forthcoming about the reasons that lead it to select, from what appears to patrons to be a cluster of candidate post offices, one post office over another. In fact, patrons might express less opposition – and even offer support – if the Postal Service provided a clearer picture of its closing rationale in situations like the one Petitioner Ard discusses.

Anticipated savings. The Postal Service estimates that closing the Ruth Post Office will generate annual savings of \$50,609. This is based on elimination of an EAS-13 Postmaster's salary and benefits (represented as \$36,381 and \$12,188) and elimination of annual lease costs of \$2,040. *Id.*

The Commission has encouraged the Postal Service to provide more accurate, consistent, and transparent savings estimates. In this instance, the Postal Service does not identify a cost for replacement service; however, the cost may be de minimis, so its omission does not make a material difference in the estimate or warrant a remand.

V. CONCLUSION

Review of the filings in this case indicates that the current closing process continues to leave longstanding, loyal patrons frustrated, if not indignant. The Postal Service has long enjoyed the goodwill of many, so losing that goodwill over unintended actions (such as misplacing most pages of the patrons' petition) or over providing limited area-specific information on why a post office is being closed is regrettable. It would be useful if the Postal Service would continue its efforts to improve the preparation of administrative records and to address patrons' inquiries about the decision to close one office over another with specificity.

Respectfully submitted,

Patricia A. (Pat) Gallagher
Public Representative in Docket No. A2012-12
Postal Regulatory Commission
901 New York Avenue, NW Suite 200
Washington, D.C. 20268-0001

pat.gallagher@prc.gov

(202) 789-6824 (telephone)
(202) 789-6861 (facsimile)