

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

*In the Matter of:*

East Vassalboro Post Office  
East Vassalboro, Maine 04935

Docket No. A2012-34

**UNITED STATES POSTAL SERVICE COMMENTS REGARDING APPEAL**  
(December 28, 2011)

On October 25, 2011, the Postal Regulatory Commission (the “Commission”) received two appeals with the earliest postmark being dated October 14, 2011, from postal customer Charles Ferguson and a group from East Vassalboro called the Save Our Post Office Committee (“Petitioners”) objecting to the discontinuance of the Post Office at East Vassalboro, Maine (the “East Vassalboro Post Office”).<sup>1</sup> By means of Order No. 940, dated November 1, 2011, the Commission docketed the letter, assigning PRC Docket No. A2012-34 as an appeal pursuant to 39 U.S.C. § 404(d). In accordance with Order No. 940, the administrative record was filed with the Commission on November 9, 2011. Petitioners jointly filed a Participant Statement in support of the petition on November 22, 2011. On December 20, 2011, the Postal Service filed a Motion for Extension of Time to File Comments requesting that the Commission allow the Postal Service to file these Comments on or before December 28, 2011.

The letter of appeal and Participant Statement raise three issues: (1) the impact on the provision of postal services, (2) the impact upon the East

---

<sup>1</sup> This discontinuance was conducted pursuant to Handbook PO-101, dated August 2004, and updated with Postal Bulletin revisions through August 2, 2007.

Vassalboro community, and (3) the calculation of economic savings expected to result from discontinuing the East Vassalboro Post Office. As reflected in the administrative record of this proceeding, the Postal Service gave each of the three issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,<sup>2</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the East Vassalboro Post Office should be affirmed.

### **Background**

The Final Determination To Close the East Vassalboro, ME Post Office and Continue to Provide Service by Rural Route Service ("Final Determination" or "FD"),<sup>3</sup> as well as the administrative record, indicate that the East Vassalboro Post Office provides EAS-55 level service to no delivery customers, 74 Post Office Box or general delivery customers, and to retail customers from 7:00 a.m. to 11:00 a.m. and 1:00 p.m. to 4:45 p.m. on Monday through Friday, and from 7:30 a.m. to 11:15 a.m. on Saturdays.<sup>4</sup> The Postmaster of the East Vassalboro Post Office retired on October 1, 1992.<sup>5</sup> Since the Postmaster vacancy arose, a non-career employee was installed as an officer-in-charge ("OIC") to operate the East Vassalboro Post Office. The employee serving as the OIC may be

---

<sup>2</sup> See 39 U.S.C. 404(d)(2)(A).

<sup>3</sup> The Final Determination can be found at Item 47 in the administrative record. All citations to the Final Determination will be to "FD at \_," rather than to Item 47. The FD page number refers to the pages as marked on the upper right of the document. Other items in the administrative record are referred to as "Item \_" unless indicated otherwise in these footnotes.

<sup>4</sup> FD at 2; Item 18, Form 4920 at 1; Item 33, Proposal at 2.

<sup>5</sup> *Id.*

separated from the Postal Service. No other Postal employee will be adversely affected.<sup>6</sup> The average number of daily retail window transactions at the East Vassalboro Post Office is 18, accounting for 17 minutes of retail workload daily.<sup>7</sup> Revenue for the last three years has declined: \$24,461 in FY 2008; \$22,668 in FY 2009; and \$22,457 in FY 2010.<sup>8</sup>

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route service administered by the North Vassalboro Post Office, an EAS-16 level office, located approximately 2 miles away, which has 169 unassigned Post Office Boxes.<sup>9</sup> This service will continue upon implementation of the Final Determination.

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the East Vassalboro Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to all Post Office Box customers of the Post Office.<sup>10</sup> Questionnaires were also available over the counter for retail customers at the East Vassalboro Post Office.<sup>11</sup> A letter from James Thornton, Manager, Post Office Operations, Portland, Maine, was also made available to postal customers, which advised customers that the Postal

---

<sup>6</sup> FD at 8; Item 33, Proposal at 8.

<sup>7</sup> FD at 2; Item 33, Proposal at 2.

<sup>8</sup> FD at 4; Item 18, Form 4920; Item 33, Proposal at 5.

<sup>9</sup> FD at 2; Item 18, Form 4920; Item 33, Proposal at 2.

<sup>10</sup> Item 20, Questionnaire Instruction Letter.

<sup>11</sup> *Id.*

Service was evaluating whether the continued operation of the East Vassalboro Post Office was warranted, and that effective and regular service could be provided through alternative means through rural carrier service as well as retail services available at the North Vassalboro Post Office.<sup>12</sup> The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service that they were receiving and the effects of a possible change involving rural carrier delivery. Eighty-four customers returned questionnaires, and the Postal Service responded.<sup>13</sup> In addition, representatives from the Postal Service were available at the Vassalboro Town Hall Conference Room for a community meeting on May 26, 2011, to answer questions and provide information to customers.<sup>14</sup> Nine customers attended.<sup>15</sup> Customers received formal notice of the Proposal and Final Determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the East Vassalboro Post Office and the North Vassalboro Post Office<sup>16</sup> for 60 days beginning June 14, 2011, and ending August 15, 2011.<sup>17</sup>

Seven customers returned comments in response to the “Invitation for Comments” after the Proposal was posted.<sup>18</sup> The Postal Service addressed those

---

<sup>12</sup> Item 21, Cover Letter for Questionnaire.

<sup>13</sup> Item 22, Returned Questionnaires and Postal Service Response Letters; Item 23, Analysis of Questionnaires.

<sup>14</sup> Item 24, Community Meeting Roster; Item 25, Community Meeting Analysis.

<sup>15</sup> *Id.*

<sup>16</sup> The North Vassalboro Post Office is not a candidate facility within the Retail Access Optimization Initiative (RAOI). See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1, at <http://www.prc.gov/prc-pages/library/detail.aspx?docketId=N2011-1&docketPart=Documents&docid=75971&docType=Library%20References&attrID=&attrName=>

<sup>17</sup> Item 31, Instructions to Post Proposal; Item 32, Invitation for Comments; Item 33, Proposal.

<sup>18</sup> Item 34, Comment Form; Item 40 Analysis of Comments.

concerns in letters to the customers.<sup>19</sup> The Final Determination was posted at the East Vassalboro and North Vassalboro Post Offices beginning on September 5, 2011 and ending October 6, 2011, as confirmed by the round-dated Final Determination cover sheets that appear in the administrative record as Item 47. In light of a Postmaster vacancy; minimal workload; declining revenue; the variety of delivery and retail options (including the convenience of rural delivery and retail service); little or no projected population, residential, commercial, or business growth in the area; minimal impact upon the community; and the expected financial savings, the Postal Service issued the Final Determination. Regular and effective postal services will continue to be provided to the East Vassalboro community in a cost-effective manner upon implementation of the final determination.

### **Analysis**

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 closing the East Vassalboro Post Office on postal services provided to East Vassalboro customers. The closing is premised upon providing regular and effective postal services to East Vassalboro customers.

Petitioners raise the issue of the effect on postal services as a result of the East Vassalboro Post Office's closing noting the convenience of the location and

---

<sup>19</sup> Item 38, Proposal Comments and Postal Service Response Letters.

requesting its retention. They express particular concern about the effect the closing will have on East Vassalboro's senior citizens and disabled residents. These concerns were considered by the Postal Service. In particular, the Postal Service explained that customers will continue to receive regular and effective postal services.<sup>20</sup> With regard to senior citizens, the Postal Service explained that services provided at the East Vassalboro Post Office will be available through rural route service to roadside boxes, and noted the benefits of the carrier providing delivery and retail services in this manner.<sup>21</sup>

Rural route delivery service provides the customers of East Vassalboro with the ability to perform most transactions currently available at the East Vassalboro Post Office.<sup>22</sup> Carrier service is especially beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes.<sup>23</sup> Through Stamps by Mail and Money Order Application forms, most transactions do not require customers to meet the carrier at the mailbox.<sup>24</sup> Various options exist for the shipping of packages, which are explained on [www.usps.com](http://www.usps.com). If internet access is available, the Postal Service's Click-N-Ship service enables customers to print shipping labels with postage for Express Mail and Priority Mail. Carrier pickup is available, which allows for scheduling the pickup of packages at the same time the carrier

---

<sup>20</sup> FD at 6.

<sup>21</sup> FD at 4.

<sup>22</sup> FD at 2-6.

<sup>23</sup> FD at 2-3; Item 22, Returned Questionnaires and Postal Service Response Letters at 1; Item 23, Analysis of Questionnaires at 2; Item 33, Proposal at 2-3; Item 38, Proposal Comments and Postal Service Response Letters at 1, 2B, 7B.

<sup>24</sup> FD at 4.

delivers the mail.<sup>25</sup> In the regular course of business, parcels and other mail can also be picked up from a delivery receptacle when visited by a non-city or city carrier.<sup>26</sup> Of course, services are also available for those customers who do not have computers. Stamps by Mail and Money Order Application forms are also available for customer convenience, and stamps are also available at many stores and gas stations, or by calling 1-800-STAMP-24.<sup>27</sup> Customers can also request special services, such as certified, registered, or Express Mail, Delivery Confirmation, Signature Confirmation, and COD from the carrier.<sup>28</sup>

Further, most transactions do not require meeting the carrier at the mailbox.<sup>29</sup> Special provisions are made, on request, for hardship cases or special customer needs.<sup>30</sup>

Petitioners contend that rural route delivery service will cause difficulty for residents who work during the day and are unable to be home to sign for accountable mail, such as Certified Mail. Petitioners explain that this problem is highlighted because traveling to the North Vassalboro Post Office before it closes to receive accountable mail will prove difficult for many in the East Vassalboro community. Current Postal Service regulations and standards that apply to

---

<sup>25</sup> FD at 4-6.

<sup>26</sup> In accordance with aviation security requirements, postage must be paid on parcels over 13 ounces so as to confirm the sender as the recipient of mail at that receptacle.

<sup>27</sup> *Id.*

<sup>28</sup> FD at 5.

<sup>29</sup> FD at 2-3; Item 22, Returned Questionnaires and Postal Service Response Letters at 1; Item 23, Analysis of Questionnaires; Item 33, Proposal at 2-3; Item 38, Proposal Comments and Postal Service Response Letters at 1, 2B, 7B; Item 40, Analysis of Comments.

<sup>30</sup> *Id.*

accountable mail address Petitioners' concerns.<sup>31</sup> If the carrier attempts to deliver accountable mail and the addressee is unable to sign for the letter, the carrier will leave a Form 3849 informing the addressee that the carrier attempted to an accountable letter, but was unable. The form indicates that the letter is available in the local post office or the addressee may request redelivery.<sup>32</sup> The addressee is give the option to specify the date he or she would like the letter to be delivered, may change the redelivery address to his or her workplace (if the work location is in the same town), or may designate a friend, neighbor or family member to accept the letter and the carrier will deliver the letter to that individual (if the individual is in the same town).<sup>33</sup> The original addressee may also receive the letter at the North Vassalboro Post Office on Saturday during business hours or the addressee's designee may receive the letter at the North Vassalboro Post Office, Monday through Saturday during business hours.<sup>34</sup> Once again, the Postal Service emphasizes that the North Vassalboro Post Office is approximately two miles from East Vassalboro.<sup>35</sup> In sum, the Postal Service makes available several options for East Vassalboro Post Office customers that choose to utilize rural route delivery service and receive accountable mail but are unable to be home during the week to sign for such mail.

Petitioners and the community raised several concerns regarding mail security, including that some mailboxes on the rural routes are not safe for mail delivery because of theft and leaving money in mailboxes for services such as

---

<sup>31</sup> See Domestic Mail Manual § 508.1.1.7; Postal Operations Manual §§ 812.4, 619.2.

<sup>32</sup> See Form 3849

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> FD at 2.

stamp purchases is not safe. The Postal Service explained, however, that customers may place a lock on their mailboxes as long as the mailbox has a slot large enough to accommodate the customer's normal daily volume of mail.<sup>36</sup> If the customer chooses to lock the mailbox, the Postal Service will not accept a key for and will not open the customer's mailbox.<sup>37</sup> As part of the discontinuance process, questionnaires were sent to the US Postal Inspection Service and the Kennebec County Sheriff's Department concerning mail theft and vandalism in the East Vassalboro Post Office area.<sup>38</sup> Postal Inspection Service records indicate that there has not been any report of mail theft or vandalism mailboxes in the area.<sup>39</sup> Nevertheless, instead of placing money in their mailbox for stamps or special services, customers may place notes in their mailboxes instructing the carriers to sound their horns when they arrive in order to facilitate financial transactions.<sup>40</sup> The Postal Service is vigilant to mail theft and vandalism and will provide service to East Vassalboro Post Office customers to help ensure mail security.

In addition, the loss of retail services and Post Office Boxes at East Vassalboro does not have a large impact on the quality of service provided by the Postal Service. As explained throughout the administrative record, rural

---

<sup>36</sup> FD at 4; Item 25, Community Meeting Analysis; Item 33, Proposal at 4.

<sup>37</sup> *Id.*

<sup>38</sup> FD at 3; Item 14, Inspection Service Vandalism Reports; Item 25, Community Meeting Analysis; Item 33, Proposal at 3.

<sup>39</sup> *Id.*, but see, Item 40, Analysis of 60-day Posting Comments at 2 (noting that one report of mail theft or vandalism was reported). The Postal Service concedes that this report of vandalism or theft was an error. After confirming with the Post Office Review Coordinator handling this potential discontinuation, the Postal Service can confirm that no reports of vandalism or theft were reported by the Inspection Service or the Kennebec Sherriff's Department.

<sup>40</sup> FD at 2; Item 33 Proposal at 2.

route carriers can perform many functions (at the same time that the carrier delivers the mail) that will avert the need to go to any Post Office, North Vassalboro or otherwise.<sup>41</sup>

Pointing to alleged defects and repeated answers within the administrative record, the Petitioners claim that the Postal Service provided “computer generated responses” to community concerns that made the Final Determination look “as though it had been generated by a bug-ridden computer.” However, the administrative record reflects that while some answers may be “standard” to the extent that these questions have been posed in other discontinuance dockets, the answers provided are responsive to the concerns raised. Moreover, the Postal Service notes that the record in this proceeding is very extensive, consisting of nearly one hundred customer comments, a signature petition signed by more than 220 members of the East Vassalboro community, congressional inquiries, and the Postal Service’s responses to customer feedback. Under these circumstances, criticism about the Postal Service’s failure to make an independent inquiry is simply not supported.

Petitioners note that the community meeting was held on May 26, 2011, at 5:00 p.m. and that many residents were still at work or away for the Memorial Day holiday when the meeting was held. Petitioners also assert that the location of the community meeting, at the town office 2.4 miles from the East Vassalboro Post Office, was an issue and that the community meeting should have been held at another location. The Postal Service notes that its internal regulations give local discontinuance coordinators flexibility in determining meeting times and

---

<sup>41</sup> FD at 2-4 Item 33, Proposal at 2-4.

locations that encourage customer participation.<sup>42</sup> No single time or location is ever consistent with all customer preferences; hours within an office's normal hours of operation generally suit customers who routinely visit that office, while inconveniencing customers who only occasionally visit the office, thereby conflicting with their work hours in many cases. Evening hours may suit the occasional customers, while inconveniencing regular customers. That is one reason why a discontinuance study process affords customers multiple avenues for providing their input: questionnaires, community meeting, written correspondence at any time, and if those opportunities do not suffice, then formal comments on a proposal posted for 60 days provide another means for submission of customer input.

Petitioners state that no notes were taken at the community meeting. Postal Service employees at the meeting did take notes identifying the issues raised by community members. Those notes were used to create Item 25, the Community Meeting Analysis, which is included in the administrative record; however, the actual handwritten notes are not part of the administrative record.

Upon the implementation of the Final Determination, delivery and retail services will be provided by rural route delivery service emanating from the North Vassalboro Post Office. In addition to rural route delivery, which is the recommended alternate service, customers may also receive postal services, including P.O. Box service, at the North Vassalboro Post Office, which is located approximately two miles away. The window service hours of the North Vassalboro Post Office are from 8:00 a.m. to 12:00 p.m. and 2:00 pm to 4:45

---

<sup>42</sup> See Handbook PO-101 § 251.

p.m., Monday through Friday and from 8:00 a.m. to 11:45 a.m. on Saturdays.<sup>43</sup>

Thus, the Postal Service has properly concluded that all East Vassalboro customers will continue to receive regular and effective service via rural route delivery service.

### **Effect on Community**

The Postal Service is obligated to consider the effect of its decision to close the East Vassalboro Post Office upon the East Vassalboro 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.

East Vassalboro is an incorporated community located in Kennebec County. The community is administered politically by the Vassalboro Board of Selectmen. Police protection is provided by the Kennebec County Sheriff. Fire protection is provided by the Vassalboro Fire Department.<sup>44</sup> The questionnaires completed by East Vassalboro customers indicate that, the community is comprised of the self employed, retirees, commuters, farmers, and those who commute to work in nearby communities and work in local businesses.<sup>45</sup> The town has a handful of businesses, one church, and residents often travel to nearby communities for supplies and services.<sup>46</sup>

---

<sup>43</sup> FD at 2; Item 18, Form 4920; Item 33, Proposal at 2.

<sup>44</sup> FD at 7; Item 16, Community Survey Fact Sheet; Item 33, Proposal at 6.

<sup>45</sup> FD at 7; Item 22, Returned Questionnaires and Postal Service Response Letters; Item 33, Proposal at 6.

<sup>46</sup> FD at 7; Item 18, Form 4920; Item 33, Proposal at 6.

Petitioners raise concerns that the discontinuance of the East Vassalboro Post Office will result in a loss of identity for the community. Other community members raised similar concerns during the discontinuance process, and the Postal Service is cognizant of the importance of the East Vassalboro Post Office to members of the community and extensively considered those issues, as reflected in the administrative record.<sup>47</sup>

In response to the concern over community identity, the Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name, and that East Vassalboro customers opting to retain PO Box service would be able to retain the East Vassalboro name and ZIP Code in addresses.<sup>48</sup> Additionally, the Postal Service noted that residents may continue to meet informally, socialize, and share information at other businesses, the town's church, and residences in town.<sup>49</sup> Citizens of East Vassalboro also noted that they rely on the bulletin board located at the East Vassalboro Post Office. The record clearly indicates that the Postal Service considered this issue noting that alternative places exist to house the town's bulletin board, and even suggesting that the North Vassalboro Post Office may have a bulletin board that could be used in a similar manner.<sup>50</sup>

Nonetheless, the Postal Service determined that its customers could continue to receive effective postal services elsewhere. Communities generally

---

<sup>47</sup> FD, at 7; Item 22, Returned Questionnaires and Postal Service Response Letters; Item 23, Analysis of Questionnaires at; Item 25, Community Meeting Analysis; Item 33, Proposal at 6.

<sup>48</sup> FD at 5 (noting that those wishing to erect roadside mailboxes would use assigned 911 coded street addresses which would contain the final line Vassalboro, ME 04989).

<sup>49</sup> FD at 7; Item 33, Proposal at 6.

<sup>50</sup> *Id.*

require regular and effective postal services and these will continue to be provided to the East Vassalboro community. Petitioners and citizens of East Vassalboro voiced concern over local businesses and the effect that the closing might have on growth in the community. Rural route carrier service is expected to be able to handle any future growth in the community, and there is no indication that the business community will be affected adversely.<sup>51</sup>

Petitioners state that the discontinuance action will have a negative effect on businesses in the community. The Postal Service noted, and the record reflects, that the majority of the residents responding to the questionnaires would still patronize local businesses in the event the East Vassalboro Post Office was closed.<sup>52</sup> Indeed, at least one resident's response noted that there are few businesses in the area,<sup>53</sup> and a number of respondents reported that they do not use local businesses now.<sup>54</sup> Thus, the clear majority of those residents who currently patronize local businesses in East Vassalboro responded that they would continue to do so.

In addition, the Postal Service has concluded that non-postal services provided by the East Vassalboro Post Office can be provided by the North Vassalboro Post Office, which is located approximately two miles away, and

---

<sup>51</sup> FD at 6.

<sup>52</sup> Item 22 Returned Customer Questionnaires, at 1C, 2C, 3C, 4C, 5C, 6C, 7C, 8C, 9C, 10C, 11C, 15C, 16C, 17C, 18C, 19C, 20C, 21C, 22C, 23C, 24C, 26C, 29C, 30C, 32C, 33C, 36C, 37C, 38C, 39C, 40C, 41C, 43C, 44C, 45C, 47C, 48C, 49C, 50C, 51C, 53C, 54C, 55C, 56C, 57C, 59C, 63C, 64C, 65C, 66C, 67C, 68C, 69C, 71C, 72C, 74C, 75C, 76C, 77C, 78C, 81C.

<sup>53</sup> Item 22 Returned Customer Questionnaires, at 34C.

<sup>54</sup> Item 22 Returned Customer Questionnaires, at 13C, 25C, 28C, 34C, 46C, 82C, 86C.

government forms normally provided by the Post Office can be obtained at North Vassalboro or from other government agencies.<sup>55</sup>

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 closing the East Vassalboro Post Office on the community served by the East Vassalboro Post Office.

### **Economic Savings**

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The Postal Service estimates that rural route carrier service would cost the Postal Service substantially less than maintaining the East Vassalboro Post Office and would still provide regular and effective service.<sup>56</sup> The estimated annual savings associated with discontinuing the East Vassalboro Post Office are \$28,773.<sup>57</sup> Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record and consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv).<sup>58</sup>

Petitioners question the Postal Service's calculation of economic savings with respect to the consistency of this discontinuance action with provisions in Title 39 providing that no small Post Office may be closed solely for operating at a deficit. Here, however, a variety of factors inform the decision to discontinue the East Vassalboro Post Office, including a Postmaster vacancy; minimal

---

<sup>55</sup> FD at 2, 7; Item 33, Proposal at 2, 6.

<sup>56</sup> FD at 6, 8; Item 21, Cover Letter for Questionnaire; Item 33, Proposal at 6, 8.

<sup>57</sup> FD at 8; Item 29, Proposal Checklist at 2; Item 33, Proposal at 8.

<sup>58</sup> *Id.*

workload; declining revenue; the variety of delivery and retail options (including the convenience of rural delivery and retail service); little or no projected population, residential, commercial, or business growth in the area; minimal impact upon the community; and the expected financial savings<sup>59</sup> Pursuant to 39 U.S.C. § 404(d)(2)(A)(iii), the Postal Service, in determining whether to close a Post Office, must consider whether such closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.” The Postal Service's view is that the "maximum degree" obligation in section 101(b) must be read in the context of related statutory provisions. It is a directive to recognize that special consideration must be given to the greater likelihood of dependence on postal retail facilities for access to postal products and services in rural communities and small towns; however, this concern must be balanced with Congressional mandates that the Postal Service execute its mission efficiently and economically.<sup>60</sup> In this case, the Postal Service analyzed, among other factors, the East Vassalboro Post Office's workload and revenue.<sup>61</sup> The consideration of an office's workload and revenue is not inconsistent with the policies of Title 39, however, because analysis of workload and revenue does not imply that a small Post Office is operating at a deficit. The Postal Service then analyzed whether a maximum degree of effective and regular postal services to the area and community could be

---

<sup>59</sup> FD at 2-6; Item 18, Form 4920; Item 33, Proposal, at 2-6.

<sup>60</sup> See 39 U.S.C. §§ 101(a); 403(a), (b)(1) and (b)(3); 404(d)(2) and 3661(a).

<sup>61</sup> *Id.*

provided with rural delivery service in the absence of the Post Office, and the answer was affirmative.<sup>62</sup>

It should be noted that Petitioners allege that the Postal Service has not calculated the revenue from one business in town, North Country Rivers, that averages approximately \$50,000 in mailing per year. On this basis, Petitioners assert that the actual revenue of the East Vassalboro Post Office should be calculated at a significantly higher rate. While North County Rivers provides significant revenue to the Postal Service through its mailing, clearly the administrative function of these mailings can be handled by the North Vassalboro Post Office and the rural route carrier assigned to service this business. For example, the Participant Statement filed with the Commission concedes that North Country River no longer must physically bring its meter to the East Vassalboro Post Office to load postage but it downloads the postage directly from the Postal Service. Accordingly, this revenue is not accountable to the East Vassalboro Post Office. The Postal Service is confident that rural route delivery service, in conjunction with electronic payment for postal meters, can provide effective and regular service to this business at a reduced cost for the Postal Service.

Petitioners also allege that discontinuing the East Vassalboro Post Office will result in an overall decrease in revenue for the Postal Service because the East Vassalboro Post Office customers will not rent P.O. Boxes at the North Vassalboro Post Office, businesses will use private carriers and customers will

---

<sup>62</sup> FD at 6; Item 15, Post Office Fact Sheet; Item 17, Alternate Service Options; Item 18, Form 4920; Item 33, Proposal at 6.

shift to electronic communication. The Postal Service is cognizant of the potential for a decrease in revenue as a result of a change to the community. Nevertheless, the Postal Service does not believe that the discontinuance of the East Vassalboro Post Office will result in a significant shift of customers from the Postal Service to private carriers or electronic communication. Furthermore, even if a significant number of current P.O. Box customers chose not to utilize the North Vassalboro Post Office, the impact on the Postal Service would be trivial in relation to total savings because revenue from P.O. Box service is a relatively small proportion of an office's total revenue.<sup>63</sup>

The Postal Service determined that rural route delivery service is more cost-effective than maintaining the East Vassalboro postal facility and postmaster position.<sup>64</sup> 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 closing, consistent with its statutory obligations and Commission precedent.<sup>65</sup>

### **Effect on Postal Employees**

As documented in the record, the impact on postal employees is minimal. The Postmaster retired on October 1, 1992.<sup>66</sup> A non-career employee was installed as the temporary OIC. The non-career employee serving as the OIC

---

<sup>63</sup> See Docket No. N2011-1, USPS-T-1.

<sup>64</sup> FD at 6; Item 33, Proposal at 6.

<sup>65</sup> See 39 U.S.C. § 404(d)(2)(A)(iv).

<sup>66</sup> *Id.*

may be separated from the Postal Service.<sup>67</sup> The record shows that no other employee would be affected by this closing.<sup>68</sup> Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the East Vassalboro Post Office, consistent with its statutory obligations.<sup>69</sup>

### **Conclusion**

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the East Vassalboro Post Office on the provision of postal services and on the East Vassalboro community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, 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 East Vassalboro customers.<sup>70</sup> 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).

---

<sup>67</sup> FD at 8; Item 15, Post Office Fact Sheet at 1; Item 33, Proposal at 8.

<sup>68</sup> *Id.*

<sup>69</sup> See 39 U.S.C. § 404(d)(2)(A)(ii).

<sup>70</sup> FD at 2, 6.

Accordingly, the Postal Service respectfully requests that the determination to close the East Vassalboro Post Office be affirmed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno  
Chief Counsel  
Global Business & Service Development

William J. Trumpbour  
Attorney

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3928; Fax -4997  
[william.j.trumpbour@usps.gov](mailto:william.j.trumpbour@usps.gov)  
December 28, 2011