

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

---

*In the Matter of:*  
Prince Post Office  
Prince, WV 25907

---

Docket No. A2012-61

UNITED STATES POSTAL SERVICE  
COMMENTS REGARDING APPEAL  
(January 3, 2012)

On November 8, 2011, the Postal Regulatory Commission (Commission) received an appeal from postal customer Charles Armentrout (“Petitioner”) objecting to the discontinuance of the Post Office at Prince, West Virginia. On November 28, 2011, the Commission issued Order No. 1002, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). Thereafter, on November 30, 2011, the Commission received an appeal, from postal customer Charles Addison, postmarked October 29, 2011. The Petitioners did not file Participant Statements in support of the petition. In accordance with Order No. 1002, the administrative record was filed with the Commission on November 23, 2011.

The appeal and the Participant Statement raise two issues: (1) the impact on the provision of postal services, and (2) the impact upon the Prince community. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service’s statutory obligations and Commission precedent,<sup>1</sup> the Postal Service gave consideration to a

---

<sup>1</sup> See 39 U.S.C. 404(d)(2)(A).

number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Prince Post Office should be affirmed.

### **Background**

The Final Determination To Close the Prince Post Office and Establish Service by Rural Route Service (“Final Determination” or “FD”)<sup>2</sup>, as well as the administrative record, indicate that the Prince Post Office provides EAS-55 level service to 74 Post Office Box customers, and to retail customers 36 hours per week; there are no general delivery customers. The postmaster of the Prince Post Office retired on March 31, 2010. Since the postmaster vacancy arose, an employee from a neighboring office was installed as an officer-in-charge (“OIC”) to operate the office. The noncareer postmaster relief (“PMR”) serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility.<sup>3</sup> The average number of daily retail window transactions at the Prince Post Office is 7, accounting for 6 minutes of workload daily. Revenue generally has been declining: \$6,657.00 in FY 2008 (17 revenue units); \$5,125.00 in FY 2009 (13 revenue units); and \$4,715.00 (12 revenue units) in FY 2010.<sup>4</sup>

---

<sup>2</sup> The Final Determination can be found at Item \_\_\_\_\_ 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 \_\_\_\_.” See Item No. 33, Proposal to Close the Prince, WV Post Office and Establish Service by Rural Route Service (“Proposal”), at 2; Item No. 33, Proposal to Close the Prince, WV Post Office and Establish Service by Rural Route Service -Revised (“Revised Proposal”), at 2.

<sup>3</sup> FD at 2, 7; Item No. 18, Form 4920, Post Office Fact Sheet (Post Office Fact Sheet), at 1; Item No. 33, Proposal, at 2, 6; Item No. 41, Revised Proposal, at 2, 6.

<sup>4</sup> FD, at 2; Item No. 18, Post Office Fact Sheet, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route delivery administered by the Beckley Post Office<sup>5</sup>, an EAS-22 level office located 9 miles away, which has 2060 available Post Office Boxes. Retail services will also be available at the Piney View Post Office<sup>6</sup>, an EAS-11 office located 5 miles away, which has 131 available Post Office Boxes.<sup>7</sup> This service will continue upon implementation of the Final Determination.<sup>8</sup> Rural service will be provided to cluster box units (“CBUs”), free-standing units of individually locked mail compartments installed and maintained by the Postal Service at no cost to the customer. A parcel locker may also be installed for convenient parcel delivery for customers.<sup>9</sup>

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the Prince 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 Prince Post Office. Questionnaires were also available over the counter for retail customers at the Prince Post Office.<sup>10</sup> A letter from the Manager of Post Office Operations, Charleston, WV, was also made

---

<sup>5</sup> The Beckley Post Office is not one of the candidate facilities under Retail Access Optimization (RAO) Initiative. See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1

<sup>6</sup> The Piney View Post Office is one of the candidate facilities under RAO Initiative. See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1

<sup>7</sup>FD, at 2; Item No. 18, Post Office Fact Sheet, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

<sup>8</sup>FD at 1, 2; Item No. 33, Proposal, at 1, 2; Item No. 41, Revised Proposal, at 1, 2.

<sup>9</sup>FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

<sup>10</sup>FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Prince Post Office, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Prince Post Office was warranted, and that effective and regular service could be provided through rural delivery and retail services available at the Beckley and Piney View Post Offices. The letter invited customers to complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of a possible change involving rural route delivery.<sup>11</sup> Twenty-four (24) customers returned questionnaires, and the Postal Service responded.<sup>12</sup> In addition, representatives from the Postal Service were available at the Prince Post Office for a community meeting on April 19, 2011<sup>13</sup>, to answer questions and provide information to customers.<sup>14</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 Prince Post Office and the Beckley and Piney View Post Offices for 60 days beginning June 14, 2011.<sup>15</sup> The Postal Service subsequently revised the Proposal before finalizing the text of the Final Determination. See Item No. 38, Proposal Comments and Response Letters; Item No. 41, Revised Proposal. Thereafter, the Final Determination was posted at the same three Post Offices starting on October 7, 2011, as confirmed by

---

<sup>11</sup> Item No. 21, Cover Letter, Questionnaire and Enclosure (“Letter to Customer”), at 1

<sup>12</sup> Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters; Item No. 23, Analysis of Questionnaires, at 1.

<sup>13</sup> The present discontinuance action was processed under former Handbook PO-101 and 39 C.F.R. § 241.3, effective July 14, 2011.

<sup>14</sup> FD at 2; Item No. 21, Letter to Customer, at 1; Item No. 24, Community Meeting Roster, at 1; Item No. 25, Community Meeting Analysis; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

<sup>15</sup> FD at 2; Item No. 32, Invitation for Comments Exhibit; Item No. 33, Proposal, at 1; Item No. 36, Round-date stamped Proposals and Invitations for Comments from Affected Offices.

the round-dated Final Determination cover sheets that appear in the administrative record as Item No. 49, Round-date Stamped Final Determination.

In light of the postmaster vacancy; minimal workload; low and decreasing office revenue;<sup>16</sup> the variety of delivery and retail options (including the convenience of rural delivery and retail service);<sup>17</sup> no projected population, residential, commercial, or business growth in the area;<sup>18</sup> minimal impact upon the community; and the expected financial savings,<sup>19</sup> the Postal Service issued the Final Determination.<sup>20</sup> Regular and effective postal services will continue to be provided to the Prince community in a cost-effective manner upon implementation of the Final Determination.<sup>21</sup>

Each of the issues raised by the Petitioner 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 Prince Post Office on postal services provided to Prince Post Office customers. The closing is premised upon providing regular and effective postal services to Prince Post Office customers.

The Petitioners, in their letters of appeal, raise the issue of the effect on postal services of the Prince Post Office's closing, noting the convenience of the Prince Post

---

<sup>16</sup> See note 5 and accompanying text.

<sup>17</sup> FD at 7; Item No. 33, Proposal, at 6; Item No. 41, Revised Proposal, at 6.

<sup>18</sup> Item No. 16, Community Survey Sheet.

<sup>19</sup> FD at 5-7; Item No. 18, Post Office Fact Sheet, at 1; Item No. 29, Proposal Checklist, at 1; Item No. 33, Proposal, at 5-6; Item No. 41, Revised Proposal, at 5-6.

<sup>20</sup> FD at 7.

<sup>21</sup> FD at 1, 7.

Office, and requesting its retention. Petitioners state that because the Beckley Post Office is 9 miles from the Prince community, travel would be inconvenient and result in a hardship on elderly customers.

With regard to Petitioner's concern about the need to travel to the Beckley Post Office, as explained throughout the administrative record, replacement service will be provided to the Prince community through rural route service emanating from the Beckley Post Office.<sup>22</sup> The Postal Service explained that rural carriers can perform many functions (at the same time that the carrier delivers the mail) that alleviate the need to travel to nearby Post Offices for most transactions. FD at 3, 4. Upon the implementation of the Final Determination, customers will be able to obtain stamps, money orders, and special services such as certified, registered, Express Mail, delivery confirmation, signature confirmation, and COD through the rural carrier. FD at 3, 4; Item No. 25, Community Meeting Analysis, at 1-2, Concerns and Responses # 5 and 6; Item No. 33 Proposal, at 3; Item No. 40, Analysis of Comments, at 1-2, Concern and Response # 6; Item No. 41, Revised Proposal, at 3, 4. In addition, many services do not require direct interaction with a carrier, to include purchase of Stamps by Mail and Money Order application forms. FD at 4; Item No. 22, Returned Customer Questionnaires and USPS response letters, at 6, 10; Item No. 23, Analysis of Questionnaires, at 2, Concern and Response # 2; Item No. 25, Community Meeting Analysis, at 1, Concern and Response # 6; Item No. 33 Proposal, at 4; Item No. 40, Analysis of Comments, at 2, Concern and Response # 6; Item No. 41, Revised

---

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

Proposal, at 4. Furthermore, customers may purchase stamps online or by phone. FD at 4; Item No. 40, Analysis of Comments, at 1, Concern and Response # 5; Item No. 41, Revised Proposal, at 4. In addition to carrier service, customers may also receive delivery and retail services at the Beckley Post Office, which is located 9 miles away, and retail services from the Piney View Post Office, which is located 5 miles away. FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. The window service hours of the Beckley Post Office are from 8:00 a.m. to 6:00 p.m., Monday through Friday, and 9:00 a.m. to 1:00 p.m. on Saturday. FD, at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. The window service hours of the Piney View Post Office are from 7:30am to 11:30am, and 12:30am to 4:15pm, Monday through Friday, and 8:00a.m. to 10:45 a.m. on Saturday. See id.

Petitioners state that many of the Prince customers do not use computers, and will not have access to delivery and retail services provided online. 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. FD, at 3, 4; Item No. 22, Returned Optional Comment Forms and USPS Response Letters, at 10; Item No. 23, Customer Questionnaire Analysis, at 2; Item No. 25, Community Meeting Analysis, at 1, Concern and Response # 6; Item No. 33, Proposal, at 3; Item No. 41, Revised Proposal, at 3, 4. Customers can also request special services, such as certified, registered, or Express mail, delivery confirmation, signature confirmation, and COD from the carrier. FD at 3; Item No. 22, Returned Optional

Comment Forms and USPS Response Letters, at 10; Item No. 23, Customer Questionnaire Analysis, at 2, Concern and Response # 2; Item No. 25, Community Meeting Analysis, at 1, Concern and Response # 6; Item No. 33, Proposal, at 3; Item No. 41, Revised Proposal, at 3. Customers who desire such special services may obtain them from the carrier, who will estimate cost, provide a receipt, and bring change or a bill for the remaining amount the next delivery day (or the customer may leave a note with the appropriate payment and the carrier will leave a receipt the next day). Customers can also request special services, such as certified, registered, or Express mail, delivery confirmation, signature confirmation, and COD from the carrier. FD at 3; Item No. 22, Returned Optional Comment Forms and USPS Response Letters, at 10; Item No. 23, Customer Questionnaire Analysis, at 2, Concern and Response # 2; Item No. 25, Community Meeting Analysis, at 1, Concern and Response # 6; Item No. 33, Proposal, at 3; Item No. 41, Revised Proposal, at 3.

Petitioners also express concern about driving to the Beckley Post Office in inclement weather during the wintertime. However, as addressed above, postal customers will not have to travel to another Post Office to receive mail or conduct retail transactions. Rather, the rural route carrier will provide retail services to CBUs. FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. While not directly addressed in the record, the Postal Service also notes that safety of customer access is routinely considered in connection with CBU placement. Specifically, Postal Operations Manual § 631.441 provides that: "CBUs may be approved for use at one or more central delivery points in a residential housing community. The local postal manager must

approve the mailbox sites and type of equipment. Boxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail.”

Because a customer can receive retail and delivery service from a rural route carrier, and retrieve their mail from a CBU, they do not have to travel to a nearby post office.

The Petitioners also express concern for senior citizens and residents unable to drive to nearby communities, especially in inclement weather. The record explains, however, that carrier service is beneficial to many senior citizens and those who face special challenges because they do not have to travel to the Post Office for service. FD at 3-4; Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters, at 7; Item No. 23, Analysis of Questionnaires, at 3, Concern and Response # 7; Item No. 33, Proposal, at 3; Item No. 38, Proposal Comments and Response Letters, 1, 2, 4, 5, 6, 7, 9; Item No. 40, Returned Optional Comment Forms, at 7, 8; Item No. 41, Revised Proposal, at 3. When packages do not fit in the customers’ mail box, the carrier will deliver the package up to ½ mile off the line of travel, at a designated place, such as the customer’s porch or under carport. FD at 3; Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters, at 1, 4; Item No. 23, Analysis of Questionnaires, at 3, Concern and Response # 7; Item No. 33, Proposal, at 3; Item No. 38, USPS Response Letters to Optional Comment Forms, at 6; Item No. 40, Analysis of Comments, at 1, Concern and Response # 1; Item No. 41, Revised Proposal, at 3. In hardship cases, delivery can be made to the home of a customer. FD at 4; Item No. 22, Returned Customer Questionnaires and Postal Service Response

Letters, at 7; Item No. 33, Proposal, at 3; Item No. 38, USPS Response letters to Option Comment Forms, at 1, 2, 4, 5, 6, 7, 9; Item No. 41, Revised Proposal, at 3.

Thus, the Postal Service has properly concluded that all Prince customers will continue to receive regular and effective service via rural route delivery to CBUs installed on the carrier's line of travel.

### **Effect Upon the Prince Community**

The Postal Service is obligated to consider the effect of its decision to close the Prince Post Office upon the Prince 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 close or consolidate a Post Office.

Prince is an unincorporated rural community located in Fayette County. The community is administered politically by Fayette County Commission. The West Virginia State Police and the Fayette County Sheriff's Department provide police protection. Fire protection is provided by the Danese Volunteer Fire Department. FD at 5; Item No.16, Community Survey Fact Sheet, at 1; Item No. 33, Proposal at 5; Item No. 41, Revised Proposal, at 5. The questionnaires completed by Prince customers indicate that the Prince community is comprised of retirees, self-employed individuals, and railroad workers. FD at 5; Item No.16, Community Survey Fact Sheet, at 1; Item No. 33, Proposal at 5; Item No. 41, Revised Proposal, at 5.

The Petitioners' letters of appeal raise the issue of the effect of closing the Prince Post Office upon the Prince community. More specifically, Petitioner contends that the Prince Post Office is a valuable asset to the community and that discontinuing it would be to the detriment of Prince customers. These issues were extensively considered by the Postal Service, as reflected in the administrative record. FD, at 3-5; Item No.22, Returned customer questionnaires and Postal Service response letters; Item No. 23, Customer Questionnaire Analysis; Item No. 25, Community Meeting Analysis; Item No. 33, Proposal 2-5; Item No. 41, Revised Proposal, at 2-5.

The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name. The record makes clear that the Postal Service is addressing community identity through preservation of the community identity by continuing the use of the Prince Post Office name and ZIP Code in addresses. FD at 5; Item 22, Returned Optional Comment Forms and USPS Response letters, at 3; Item No. 23, Analysis of Questionnaires, at 3, Nonpostal Concern and Response #1; Item No. 25, Community Meeting Analysis, at 2, Nonpostal Concern and Response # 1; Item No.33, Proposal at 5; Item No. 41, Revised Proposal, at 5. Communities generally require regular and effective postal services and these will continue to be provided to the Prince community.

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 Prince Post Office on the community served by the Prince 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 Prince Post Office and would still provide regular and effective service. FD at 6, 7; Item No. 17, Rural Route Carrier Analysis; Item No. 33 Proposal, at 6; Item No. 41, Revised Proposal, at 6. The estimated annual savings associated with discontinuing the Prince Post Office are \$33,838.00. FD at 7; Item No. 33, Proposal, at 6; Item No. 41, Revised Proposal, at 6. 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). FD at 6; Item No. 33, Proposal, at 12-13.

The Postal Service determined that rural carrier service and conducting business at the Beckley or Piney View Post Offices are more cost-effective than maintaining the Prince Post Office Hill postal facility and postmaster position. FD at 6-7. 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. 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 retired on March 31, 2010. A noncareer employee from a neighboring office

was installed as the temporary officer-in-charge (OIC). The noncareer PMR serving as the OIC may be separated from the Postal Service, although attempts will be made to reassign the employee to a nearby facility. The record shows that no other employee would be affected by this closing. FD at 2, 7; Item No. 15, Post Office Survey Sheet, at 1; Item No. 33, Proposal, at 2, 6; Item No. 41, Revised Proposal, at 2, 6.

Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the Prince 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 closing the Prince Post Office on the provision of postal services and on the Prince 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 Prince customers. FD at 7. 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). The Postal Service's decision to close the Prince Post Office should, accordingly, be affirmed.

Respectfully submitted,

**UNITED STATES POSTAL SERVICE**

By its attorneys:

Anthony F. Alverno  
Chief Counsel, Global Business & Service  
Development

Shayla N. McGee  
Appellate Counsel

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2956; Fax -5287  
Shayla.N.McGee@usps.gov