

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

In the Matter of:
Ferguson Post Office
Ferguson, Iowa 50078

Docket No. A2012-28

NOTICE OF THE UNITED STATES POSTAL SERVICE OF FILING ERRATA
(January 10, 2012)

The Postal Service hereby gives notice of filing errata to its initial brief, filed on December 15, 2011. One minor correction to page 9 of the initial brief, and three minor corrections to page 10 of the initial brief, are being filed as an attachment to this pleading. The corrections are shown in gray highlighted text. The Postal Service regrets the inconvenience, but does not believe any party is prejudiced.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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

B.J. Meadows III
Attorney, Legal Strategy

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-3009; Fax -5329
b.jeff.meadows@usps.gov
January 10, 2012

does not open mailboxes that are locked and does not accept keys for this purpose. The mailbox must have a slot large enough to accommodate the customer's normal daily mail volume. FD at 3; Item 41, Revised Proposal, at 3; Item 23, Customer Questionnaire Analysis, at 1.

Thus, the Postal Service has properly concluded that all Ferguson customers will continue to receive regular and effective service via rural route delivery to mailboxes installed on the carrier's line of travel. Most transactions do not require meeting the carrier at the mailbox. Stamps by Mail and Money Order Application forms are available for customer convenience. FD at 2, 4; Item 41, Revised Proposal, at 2, 4; Item 22, Returned Customer Questionnaires and Postal Service Response Letters, at 52.

Effect Upon the Ferguson Community

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

Ferguson is an incorporated community located in Marshall County, Iowa. The community is administered politically by a Mayor and City Council. Police protection is provided by the Marshall County Sheriff. Fire protection is provided by the Ferguson Volunteer Fire Department. There are several businesses and churches located in the Ferguson community. The community is comprised of

mostly retirees, some commuters, those who work in local businesses, and those who commute to work at nearby communities. FD at 6; Item 41, Revised Proposal, at 8; Item 16, Community Survey Sheet, at 1; Item 7, Post Office and Community Photos, at 1. The high school (East Marshall) is located in LeGrand, and the overwhelming majority of customers who returned questionnaires to the Postal Service indicated that they travel outside Ferguson for supplies and services. Item 22, Returned Customer Questionnaires.

The Petitioner's letter of appeal, and comments written on the returned customer questionnaires, raise the issue of the effect of the closing of the Ferguson Post Office upon the Ferguson community. This issue was extensively considered by the Postal Service, as reflected in the Administrative Record. FD at 6, 8; Item 41, Revised Proposal, at 3, 7-8. A community's identity derives from the interest and vitality of its residents and their use of its name, and the record makes clear that the Postal Service is addressing this concern through preservation of community identity by continuing the use of the Ferguson name and ZIP code in addresses. FD at 6; Item 41, Revised Proposal, at 7.

Communities generally require regular and effective postal services and these will continue to be provided to the Ferguson community. The proposed alternate delivery service will meet the mailing and service needs in an effective matter. FD at 6, 8.¹⁵ There is no indication that the business community will be

¹⁵ Petitioner raises concerns about the sanctity and security of the mail, and inconveniences in purchasing stamps and money orders and sending accountable mail, were the Ferguson Post Office to close. The Postal Service has addressed these concerns, as indicated in the Administrative Record. See FD at 3, 4; Item 41, Revised Proposal, at 3, 4.