

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Deering Post Office
Deering, Missouri

Docket No. A2012-58

PUBLIC REPRESENTATIVE COMMENTS

(January 18, 2012)

Upon careful review of the Postal Service's Final Determination, the materials in the Administrative Record, the arguments presented by Petitioner, and the Postal Service Comments, the Public Representative concludes that it appears the Postal Service has followed applicable procedures. However, two uncontested facts in the Administrative Record warrant close consideration:

1. After closure of the Deering post office, the Wardell post office located 17 miles away from the Deering post office will be the administrative post office to provide rural route delivery service to current Deering post office box customers if they choose delivery service. Final Determination at 2; Petition at 1. Seventeen miles is an inordinate distance for customers to travel to retrieve mail that cannot be delivered and/or held pending pick up, or for services that cannot reasonably be provided by the carrier. However, the nearest post office, Braggadocio, is only 4 miles away and provides retail and post office box service. Final Determination at 2; Administrative Record, Item No. 42. The Braggadocio post office is on the Postal Service's list of low volume offices to be considered for closing.¹ Nevertheless, the Postal

¹ See Docket No. N2011-1, LR-N2011-1/2, Retail Access Optimization Initiative Discontinuance Candidate Facility List Relating to the Testimony of Witness Boldt (USPS-T-1), Low workload post offices.

Service does not explain the reason for assigning administrative office delivery service duties to a post office so distant from the Deering post office.

2. The current Deering, Missouri post office has 70 post office boxes rented. Final Determination at 2; Administrative Record, Item Nos. 8, 9 and 42. The administrative office, Wardell post office, 17 miles away, only has 40 available post office boxes. Final Determination at 2; Administrative Record, Item No. 42. The nearest post office, the Braggadocio post office with retail services, also has 66 post office boxes available, but, nevertheless, has fewer than the 70 post office boxes rented at the Deering post office. Final Determination at 2. The further complication that the Braggadocio post office is listed by the Postal Service as one of the low volume offices slated for consideration to close increases the potential for a shortage of post office boxes.² Neither the Final Determination nor the Postal Service Comments address this disparity in available post office boxes that may impact the Postal Service's ability to provide regular and effective service upon closing the Deering post office.

Given these facts, the Commission could conclude the Final Determination to close the Deering post office is arbitrary, capricious, or unsupported by substantial evidence. The Commission could remand for further consideration and explanation of (1) the need to move the administrative office such a great distance from the Deering post office; and/or (2) the Postal Service's ability to continue to provide regular and effective service where the distant Wardell post office has significantly fewer post office boxes than are currently rented at the Deering post office and where the Braggadocio post office under consideration for closing is the closest post office, but the only post office cited where alternative post office boxes are within a reasonable distance, also has fewer post office boxes available for rent than are rented at the Deering post office.

² See Docket No. N2011-1, LR-N2011-1/2, Retail Access Optimization Initiative Discontinuance Candidate Facility List Relating to the Testimony of Witness Boldt (USPS-T-1), Low workload post offices.

Respectfully submitted,

Kenneth E. Richardson
Public Representative

901 New York Avenue, NW, Suite 200
Washington, DC 20268-0001
202-789-6859, FAX: 202-789-6861
email: richardsonke@prc.gov