

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

In the Matter of:
South Greenfield Post Office
South Greenfield, MO 65752

Docket No. A2012-82

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(January 23, 2012)

On November 28, 2011, the Postal Regulatory Commission (Commission) received correspondence postmarked November 12, 2011 from postal customer Kitty Ayres objecting to the discontinuance of the Post Office in South Greenfield, Missouri. On December 8, 2012, the Commission issued Order No. 1031, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 1031, the administrative record was filed with the Commission on December 13, 2011. On January 4, 2012, Petitioner Kitty Ayres filed a Participant Statement, Form 61, in support of the petition.

The correspondence received by the Commission raises three issues: (1) the impact upon the provision of postal services, (2) the effect on community, and (3) economic savings. 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,¹ the Postal Service gave consideration to a number of other issues, including the impact upon postal

¹ See 39 U.S.C. 404(d)(2)(A).

employees. Accordingly, the determination to discontinue the South Greenfield Post Office should be affirmed.

Background

The Final Determination To Close the South Greenfield, MO Post Office and Establish Service by Rural Route Service (FD), as well as the administrative record, indicate that the South Greenfield Post Office provides EAS-55 level service to 55 Post Office Box customers, retail customers, and no delivery customers 39 hours per week. FD, at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet (“Fact Sheet”), at 1; Item No. 33, Proposal Exhibit, at 2; Item No. 41, Revised Proposal, at 2.² The Postmaster of the South Greenfield Post Office resigned on October 10, 2008. Since the postmaster vacancy has arisen, an Officer-in-Charge (OIC) has been installed to operate the office. The noncareer postmaster relief may be separated from the Postal Service; however, attempts will be made to reassign the employee to a nearby facility. The record shows that no other employee would be adversely affected by this closing.³ The average number of daily retail window transactions at the South Greenfield Post Office is 44, accounting for 47 minutes of daily retail workload. Additionally, revenue has generally been low and declining: \$11,305.00 in FY 2008 (29 revenue units); \$10,718.00 in FY 2009 (28 revenue units); and \$10,072.00 (26 revenue units) in FY 2010.⁴ The South Greenfield Post Office has no permit or postage meter customers. FD, at 2; Item No. 15, Post Office Survey Sheet, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

² In these comments, specific items in the administrative record are referred to as “Item ____.”

³ FD, at 2, 10; Item No. 33, Proposal to Close the South Greenfield, MO Post Office and Establish Service by Rural Route Service (“Proposal”), at 2, 9; Item No. 41, Revised Proposal, at 11.

⁴ FD, at 2; Item No. 18, Post Office Closing or Consolidation Proposal, 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 Lockwood Post Office,⁵ an EAS-16 level office located seven miles away, which has 141 available Post Office Boxes. FD, at 2; Item No. 18, Post Office Closing or Consolidation Proposal, at 1; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. Additionally, the Greenfield Post Office, an EAS-16 level office, is located only three miles away and has 87 Post Office Boxes available for a fee.

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the South Greenfield Post Office were considered and properly addressed by the Postal Service. The Postal Service gave customers advance notice of its intentions and its determination. In addition to the posting of the Proposal and FD, customers received notice through other means. 210 Questionnaires were distributed to delivery customers of the South Greenfield Post Office. Questionnaires were also available over the counter for retail customers at the South Greenfield Post Office. FD, at 2; Item No. 23, Postal Service Customer Questionnaire Analysis at 1. A letter from the Manager of Post Office Operations, Kansas City, MO, was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the South Greenfield Post Office was warranted, and whether effective and regular service could be provided through rural route delivery and retail services available at the Lockwood Post Office. Item No. 21, Letter to Customer, at 1. The letter then invited

⁵ The Lockwood and Greenfield Post Offices are not part of the candidate facilities on the RAOI. See Docket No. N2011-1, USPS LR-N2011-1/11 Rev 1, available at <http://www.prc.gov/prc-pages/library/detail.aspx?docketId=N2011-1&docketPart=Documents&docid=75971&docType=Library%20References&attrID=&attrName=>

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. *Id.* The returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 22. In addition, representatives from the Postal Service were available at the First Baptist Church for a community meeting on June 10, 2011 from 6:00 p.m. to 7:00 p.m. to answer questions and provide information to customers. FD, at 2; Item No. 21a, Letter to Customer, at 1; Item No. 24, Community Meeting Roster; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. Customers received formal notice of the Proposal through postings at the South Greenfield, Greenfield, and Lockwood Post Offices, and through postings of the FD at the same three offices. The Proposal was posted with an invitation for public comment from July 14, 2011 to September 14, 2011,⁶ as confirmed by the round-dated Proposal cover sheet that appears in the administrative record. FD, at 2; Item No. 33, Invitation for Comments on the Proposal to Close the South Greenfield, MO Post Office and Establish Service by Rural Route, at 1; Item No. 36, Round-date Stamped Proposals and Invitations for Comments from Affected Offices, at 1-6; Item No. 38, Postal Service Response Letter, at 2. The FD was posted at the three aforementioned Post Offices from October 5, 2011 to November 6, 2011. Item No. 49, Round-date Stamped Final Determination Cover Sheets, at 1-3.

In light of a postmaster vacancy; minimal workload; low and declining office revenue;⁷ the variety of delivery and retail options (including the convenience of rural

⁶ The South Greenfield, MO Post Office Discontinuance action was conducted under regulations in the prior version of Handbook PO-101.

⁷ See note 4 and accompanying text.

delivery and retail service);⁸ limited expected population, residential, commercial or business growth in the area;⁹ minimal impact upon the community; and the expected financial savings,¹⁰ the Postal Service issued the FD.¹¹ Regular and effective postal services will continue to be provided to the South Greenfield community in an effective manner upon implementation of the final determination. FD at 2, 10.

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

The Petitioner raises the issue of the effect on postal services of the South Greenfield Post Office's closing, noting the convenience of the South Greenfield Post Office and requesting its retention. Petitioner expresses particular concern that it may be difficult for the elderly in the community to travel to Lockwood to pick up their mail. Petitioner also notes that installing a mailbox will be a burden on certain families. Each of these concerns was considered by the Postal Service.

Upon the implementation of the final determination, delivery and retail services will be provided by rural route delivery emanating from the Lockwood Post Office, which

⁸ FD, at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

⁹ FD, at 2, 3, 5, 7, 10; Item No. 33, Proposal, at 2, 3, 4, 5, 7, 9; Item No. 41, Revised Proposal, at 2, 3, 5-6, 8, 11.

¹⁰ Item No. 16, Community Survey Sheet, at 1.

¹¹ FD, at 9.

is located seven miles away. FD at 2, 10. Petitioner notes that “it [will] take more time to have the mail delivered by a carrier out of the Lockwood Post Office” and that a change in the routing of mail “does not make sense... because [Lockwood] is 7 miles away and [South] Greenfield is only 2 miles away.” Although the Petitioner expresses concern over the proposed route, the delivery route has been carefully reviewed to ensure that the most cost-efficient service is provided. While one office may be closer for some customers, it may be further away for others. FD at 3. In addition to rural delivery, which is the recommended alternate service, customers may also receive postal services at the Lockwood and Greenfield Post Offices. The window service hours of the Lockwood Post Office are from 8:30 a.m. to 4:00 p.m. Monday through Friday, and 9:00 a.m. to 10:00 a.m. on Saturday. FD, at 2. The window service hours of the Greenfield Post Office are from 8:15 a.m. to 4:30 p.m. Monday through Friday, and 8:30 a.m. to 10:30 a.m. on Saturday. Furthermore, special attention and assistance provided by the personnel at the South Greenfield Post Office will be provided by personnel at nearby Post Offices and the carrier.

The Postal Service has considered the impact of closing the South Greenfield Post Office upon the provision of postal services to South Greenfield customers. FD at 2-10; Item No. 33, Proposal, at 2-9; Item No. 44, Revised Proposal, at 2-11. In her letter of appeal, Petitioner states that “it would be very difficult for [elderly in the community] to go to Lockwood, MO to pick up their mail.” As explained throughout the administrative record, carriers can perform many functions that will alleviate the need to travel to the Post Office for many services. Rural route delivery to customers provides similar access to many retail services, thereby stemming the need to travel to the Post

Office. FD, at 2, 3, 4, 5, 6, 7; Item No. 33, Proposal, at 2, 3, 4, 5, 7; Item No. 41, Revised Proposal, at 2, 3, 4-6, 8. In fact, most transactions do not require meeting the carrier at the mailbox. The rural carrier provides many of the services that are available at the Post Office. Furthermore, many of the services offered are available the same day and do not require advance notice for the transaction to be completed. Services available from the carrier include mailing certain packages, purchasing postal money orders, and obtaining a variety of special services, including sending accountable mail.¹² FD, at 3-4. Furthermore, carrier pickup is available and allows for scheduling the retrieval of packages at the same time as the carrier delivers the mail. 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, thereby eliminating the need to travel to a Post Office. FD, at 2. The Postal Service will work with these customers to ensure that they receive regular and effective postal services. Special provisions are made for hardship cases and special customer needs. FD, at 4. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information. *Id.*

Additionally, the Postal Service explained that it offers several convenient options which can save customers a trip to the Post Office. FD, at 2, 3, 4, 5, 6, 7; Item No. 33,

¹² 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 deliver an accountable letter, but was unable. The form indicates that the letter is available at the local Post Office or the addressee may request redelivery. The addressee is given the option to specify the date he or she would like the letter to be delivered, change the redelivery address to his or her workplace (if the work location is in the same town), or 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). The original addressee may also receive the letter at the Lockwood Post Office, Monday through Saturday during business hours or the addressee's designee may receive the letter at the Lockwood Post Office, Monday through Saturday during business hours. The Postal Service makes available several options for customers that choose to utilize Rural Route service and receive accountable mail but are unable to be home during the week to sign for such mail.

Proposal, at 2, 3, 4, 5, 7; Item No. 41, Revised Proposal, at 2, 3, 4-6, 8. If internet access is unavailable, stamps can be purchased by phone via a toll-free number, or by mail. FD, at 7; Item No. 33, Proposal, at 7; Item No., Revised Proposal, at 8.

Additionally, customers can place their mail on hold and obtain other special services by calling a toll free number or visiting the Postal Service's website. *Id.* Furthermore, if internet access is available, customers can purchase stamps online through the Postal Service's website at www.USPS.com and print shipping labels with postage for Express Mail and Priority Mail.

Petitioner expresses concern about families that are on a fixed income having to erect rural mailboxes; however citizens of the South Greenfield community are not required to do so. Customers may receive P.O. Box service from the administrative Post Office located seven miles away. Customers opting for carrier service will have 24-hour access to their mail and will not have to pay post office box fees. FD, at 7. Should customers decide this option better suit their needs, they are also welcome to conduct postal business at the Lockwood Post Office, or the Greenfield Post Office which is located three miles away, or any other convenient Post Office location. FD, at 2. Thus, the Postal Service has properly concluded that all South Greenfield customers will continue to receive regular and effective service via rural route delivery.

Effect Upon the South Greenfield Community

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

South Greenfield is an incorporated rural community located in Dade County. The Dade County Sheriff's Department provides police protection. The community is administered politically by the South Greenfield City Council, with fire protection provided by the Greenfield Volunteer Fire Department. FD, at 7; Item No. 33, Proposal at 7; Item No. 41, Revised Proposal, at 8. The questionnaires completed by South Greenfield customers indicate that the retirees, commuters, farmers, self employed, and others who reside in South Greenfield travel to nearby communities for other supplies and services. See generally FD, at 7; Item No. 22, Returned Customer Questionnaires and Postal Service Response Letters.

The Postal Service has extensively considered the effect of the closing of the South Greenfield Post Office upon the South Greenfield community, as reflected in the administrative record. FD, at 2, 3, 7, 8, 9, 10; Item No. 33, Proposal, at 2, 7, 8, 9; Item No. 41, Revised Proposal, at 2, 8, 9, 10, 11. The Postal Service explained that a community's identity derives from the interest and vitality of its residents. Residents may continue to meet informally, socialize, and share information at other businesses, churches and residences in town. FD, at 8. Communities also generally require regular and effective postal services and these will continue to be provided to the South Greenfield community. Furthermore, carrier service is expected to be able to handle any future growth in the community. FD, at 2, 9; Item No. 33, Proposal, at 2, 9; Item No. 41, Revised Proposal, at 11.

In addition, the Postal Service has concluded that nonpostal services provided by the South Greenfield Post Office can be provided by the Lockwood Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies. FD, at 7; Item No. 33, Proposal, at 7; Item No. 41, Revised Proposal, at 8. 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 South Greenfield Post Office on the community served by the South Greenfield Post Office.

Economic Savings

Postal officials 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 South Greenfield Post Office and would still provide regular and effective service. Item No. 21a, Letter to Customer, at 1. The estimated annual savings associated with discontinuing the South Greenfield Post Office are \$15,486.00. FD, at 9; Item No. 33, Proposal, at 9; Revised Proposal, at 11.

The Petitioner suggests that additional costs associated with the rural route need to be factored into the economic savings calculation; however, the cost estimate includes a deduction of \$7,461 for the annual cost of replacement service. FD, at 9; Item No. 33, Proposal, at 9; Item No. 41, Revised Proposal at 11. The Postal Service reached this figure by calculating the cost of delivering to an additional 55 boxes and adding 5.00 miles to a route. Item 17, Rural Route Carrier Estimated Cost for Alternative Replacement Service, at 2.

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, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD, at 10; Item No. 33, Proposal, at 9; Item No., 41, Revised Proposal, at 11. The Postal Service determined that carrier service is more effective than maintaining the South Greenfield postal facility and postmaster position. FD, at 10. 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 position became vacant when the postmaster resigned on October 10, 2008. Upon implementation of the final determination, the noncareer postmaster relief (PMR) may be separated from the Postal Service; however, 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, 10; Item No. 15, Post Office Survey Sheet, at 1; Item No. 33, Proposal, at 2, 9; Item 41, Revised Proposal, at 2, 11. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees at the South Greenfield 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 South Greenfield Post Office on the provision of postal services and on the South Greenfield 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 and evaluating other options, 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 South Greenfield customers. FD, at 10. 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 South Greenfield Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the South Greenfield Post Office be affirmed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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

Sonia Jain

Attorney

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5418
sonia.jain@usps.gov
January 23, 2012