

Re: Appeal of the United States Postal Service's Determination to Close the Jonesville Post Office, Jonesville, Texas 75659
Final Determination to Close Posted 12/07/2011
Docket Number 1368541-75659

From: Patricia A. Vaughan
Post Office Box 83
Jonesville, Texas 75659-0083

To: Office of the Secretary
Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, D. C. 20268-0001

I appeal the United States Postal Service's Final Determination to Close the Jonesville, Texas Post Office and I believe that the Postal Regulatory Commission should reverse the Final Determination and return the entire matter to the USPS for further consideration because that determination is unsupported by substantial evidence on the record.

1. Financial information used to support the economic savings resulting from this closure is misleading and/or incorrect.

In direct quotes from the FINAL DETERMINATION TO CLOSE THE JONESVILLE, TX POST OFFICE AND ESTABLISH SERVICE BY RURAL ROUTE SERVICE, DOCKET NUMBER 1368541-75659, the following statements are made: (All quotes are from this document and are shown in italics.)

a. Item Nbr: 35, Page Nbr:2

"The Jonesville Post Office an EAS-11 provides retail service from 830 to 1300 – 1330 to 1600 Monday through Friday and 815 to 930 on Saturday. Revenue has seen a slight increase over the last several years. The revenue trend is as follows: FY 07 \$15,783, FY 08 \$17,781, FY 09 \$18,816, FY 10 \$25,120, FY 11 \$26,379."

The stated revenue trend shows an increase in revenue of \$10,596 or 67% over a period of four years, an average of 16.75% per year. This is hardly a "slight increase". If all post offices demonstrated such a rate of revenue growth, the financial problems of the Postal Service would be solved. The Jonesville Post Office should be commended and celebrated for such success! It would be a serious mistake to close a small post office producing such an impressive record of revenue growth during a period of national economic downturn.

b. Item Nbr:35, Page Nbr: 32

"IV. ECONOMIC SAVINGS

The Postal Service estimates a ten year savings of \$226,471 with a breakdown as follows:

<i>Building Maintenance</i>	<i>0</i>
<i>Utilities</i>	<i>\$ 9,472</i>
<i>Transportation</i>	<i>0</i>
<i>EAS Craft & Labor</i>	<i>\$ 254,288*</i>
<i>Contracts</i>	<i>0</i>
<i>Rent</i>	<i>\$ 26,442**</i>
<i>Relocation One-time Cost</i>	<i>0</i>
<i>Total Ten Year Savings</i>	<i>\$226,471***</i>

*The employee at the Jonesville Post Office does not make the amount shown as EAS Craft & Labor. As stated in a previous section in the Final Determination, the postmaster position has been vacant since 2008. The current employee is Post Master Relief (PMR) and makes \$10.93 per hour or \$23,871.12 per year with no additional benefits. That means that it costs less to operate this post office than it would if the postmaster position were filled.

**The owner of the post office building who built that building specifically for use as the Jonesville Post Office generously offered to reduce the rent for the post office building from \$7,200 per year to \$3,600 per year including all maintenance of building and grounds. Even though it took several months for the USPS to accept the offer, the savings in rent reduces expenses by \$3,600 per year.

***This total was added incorrectly. What other errors were made in deciding to close this Post Office?

c. Item Nbr: 35, Page Nbr: 4, listing concerns raised by postal patrons at the community meeting on August 27, 2011:

"21. Concern: Customers asked if reducing the rent and the hours of operation would make up for lost revenue.

Response: Dr. Vaughan provided us with a revised budget reducing the rent by half. This document will be attached."

The document was not attached.

There is no evidence that suggestions from that revised budget were considered in making the determination to close the Jonesville Post Office. The proposal to reduce rent by 50% was based on an actual offer that had been made but not accepted at the time of the community meeting. Other proposed changes included reducing hours of operation by two hours per day, increasing box rent to enhance income, and applying Jonesville Post Office Revenue to operating the Jonesville Post Office. With these minor changes, the operating cost for this post office can be reduced to less than the amount of revenue generated. That means this post

office can make a profit for the Postal Service. It would be a serious financial mistake to close this post office.

Revised Budget for Jonesville Post Office as presented at Community meeting, August 27, 2011:

Annual Expense		
Utilities	\$ 1,274	
Wages	17,051	(With reduced hours of operation)
<u>Rent</u>	<u>3,600</u>	
Total expense	\$21,925	
<u>Annual Revenue</u>	<u>\$26,379</u>	(Revised to show 2011 revenue)
Annual Profit	\$4,454	
Total Ten Year Profit	\$44,540	

This proposal of minor changes deserves consideration.

d. There is no justification that closing this office will save money. All facets of the change of service have not been considered. With minor changes in hours of operation, this office can be self-sustaining. Customers opting for carrier service will not have to pay post office box fees, but they will have to provide their own rural mailbox and cope with the inconvenience of having to meet the carrier's schedule for secure services. No mention is made of the loss of revenue from discontinued post office box rental or the additional transportation and staff cost for rural route delivery.

2. Failure to adequately consider the effect of closure/consolidation on the community.

Item Nbr: 35, Page Nbr:30-31

"II. EFFECT ON COMMUNITY...

1. Concern: Customers expressed concern for loss of community identity.

Response: A community's identity derives from the interest and vitality of its residents and their use of its name."

This rural east Texas community has been proudly identified as Jonesville by its post office for more than one hundred sixty years. The post office provides the only community center for meeting neighbors and sharing community news. No local business serves as a gathering place for residents. If the post office is closed, that sense of community will be destroyed forever and Jonesville will become a ghost town.

"...to ensure effective and regular service, the ZIP Code will change."

Loss of the 75659 ZIP Code will cause Jonesville's listing to be eliminated from maps and direction finding services. Regardless of what happens to the Post Office, Jonesville's ZIP Code 75659 along with the community name should be maintained for Jonesville residents and

businesses to ensure their well established community identity. Most post offices deliver mail to multiple Zip Codes. The same can be done in this case if needed.

"2. Concern: Customers felt the loss of a post office would have a detrimental effect on the business community.

Response: ...Since the suspension of service, there has been no indication that the business community has been adversely affected..."

Postal service has not been suspended; consequently, there has been no adverse affect.

3. Failure to adequately consider the effect of such closing or consolidation on employees of the Postal Service employed at such office.

Item Nbr: 35, Page Nbr: 32

"III. EFFECT ON EMPLOYEES

The postmaster position became vacant when the postmaster retired on February 29, 2008. Finally there is 1 PMR assigned to this unit. The PMR will be separated from the Postal Service if there is no open facility within commuting distance."

The fact that the postmaster position is vacant saves the Postal Service money because a lower wage with no benefits is paid. If all postal services for Jonesville are moved to the Waskom Post Office, additional staff will be needed to handle the extra work load. It will obviously take more postal workers to deliver mail to rural mailboxes than it takes to place mail in post office boxes. It is more practical to keep a staff member in an established post office than to move her to a different job at another facility that is more inconvenient for her as well as for the customers.

4. The statement that closing or consolidation is consistent with the policy of the Government that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities and small towns where post offices are not self-sustaining does not apply to the Jonesville, Texas Post Office.

If minor changes as outlined in a previous section of this statement are made, the Jonesville Post Office will be not only self sustaining, but will actually make a profit.

