

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

South Greenfield Post Office
Greenfield, Missouri

Docket No. A2012-82

PUBLIC REPRESENTATIVE COMMENTS
(February 6, 2012)

The Postal Service has determined to close the South Greenfield, Missouri post office and provide delivery and retail services by rural route service under the administrative responsibility of the Lockwood post office located in Lockwood, Missouri. Petitioner raises two issues: (1) the negative effect of the closure on the South Greenfield community; and (2) the impact on postal services available to South Greenfield customers. After careful review of the Postal Service's Final Determination, the materials in the Administrative Record, the arguments presented by Petitioners, and the Postal Service Comments, the Public Representative concludes that the Postal Service has failed to follow applicable procedure and rendered a decision that is not substantially supported by the evidence. The Public Representative concludes the decision of the Postal Service to close the South Greenfield post office should be remanded.

On November 28, 2011, the Commission received an appeal from Ms. Kitty Ayres (Petitioner), objecting to the closing of the South Greenfield post office.¹ On

¹ Petition for Review Received from Ms. Kitty Ayres Regarding the South Greenfield, MO Post Office 65752, November 28, 2011 (Petition).

December 8, 2011, the Commission issued Order No. 1031, accepting the appeals, directing the Postal Service to file an administrative record, establishing a procedural schedule, and naming the undersigned Public Representative.² On December 13, 2011, the Postal Service filed the Administrative Record.³ On January 4, 2012, the Commission received a statement from Petitioner Ayers.⁴ On January 23, 2012, the Postal Service filed Comments in lieu of a brief.⁵ The Postal Service will provide the South Greenfield community with retail services from both the Greenfield and Lockwood post offices, and with rural carrier delivery emanating from the Lockwood post office. FD at 2.

Effect on Community: The South Greenfield community consists primarily of retirees, farmers, commuters, a small number of in-home businesses, and several local businesses. AR Item No. 16 at 1. The South Greenfield post office is an EAS-55 post office with a part-time postmaster position. AR Item No. 9 at 1. The South Greenfield post office services 53 post office box customers and two general delivery customers. AR Item 13. Based on the questionnaires, many South Greenfield residents travel to the Greenfield, Lockwood, and Miller communities for goods and services. See AR Item No. 22.

The two closest post offices to the South Greenfield post office are the Lockwood post office (8.56 miles) and Greenfield post office (4.45 miles), both are EAS-16

² Order No. 1031, Notice and Order Accepting Appeal and Establishing Procedural Schedule, December 8, 2011.

³ United States Postal Service Notice of Filing Administrative Record, December 13, 2011 (AR). The AR includes, the Final Determination to Close the South Greenfield, MO, and Establish Service by Rural Route (FD). The AR consists of 51 items and identifies the FD as Item No. 47. All references thereto will be in the following format: FD at ____.

⁴ Participant Statement Received from Kitty Ayers, January 4, 2012 (Participant Statement).

⁵ United States Postal Service Comments Regarding Appeal, January 23, 2012 (Postal Service Comments).

offices.⁶ FD at 2. Petitioner questions the Postal Service's decision to have delivery service emanate from the Lockwood post office instead of from the closer Greenfield post office. She notes that the travel and time costs associated with traveling the longer distance to Lockwood is inconsiderate and potentially harmful to South Greenfield citizens living on fixed incomes. Participant Statement at 1.

The Postal Service explains its decision to have delivery service emanating from the Lockwood post office by stating it carefully reviewed to ensure the most cost-efficient service is provided to the South Greenfield community and emphasized that while one post office may be closer to some South Greenfield residents, it may be further away for others. Service Comments at 6; FD at 3, Concern No. 5. A review of the consumer questionnaires shows that a good number of South Greenfield customers already travel outside of South Greenfield for their daily educational, social, and business needs, and are content with the selection of Lockwood post office. See AR Item No. 22. Many admit to preferring to use the Miller, Greenfield, and Lockwood post offices over the one located in South Greenfield. Both are open longer Monday through Friday,⁶ than the South Greenfield post office. However, as the South Greenfield post office was open 4 hours on Saturday, the Lockwood and Greenfield post office Saturday hours are 2 and none, respectively. Based on the information collected through the customer questionnaires, it seems that patronizing the Lockwood post office does not constitute an inconvenience for a large number of South Greenfield citizens.

For those unable to travel the distance to the Lockwood post office, the Postal Service ensures that the same services provided at the Lockwood post office will be available from the carrier. FD at 4, Concern No. 14. For this reason, rural carrier service is beneficial to the elderly and those who find it difficult to access mail by

⁶ MapQuest estimates the shortest driving distance between the South Greenfield and Lockwood post offices to be approximately 8.56 miles (13 minutes driving time). The Postal Service's estimates this distance to be 5.8 miles. MapQuest estimates the shortest driving distance between the South Greenfield and Greenfield post offices to be approximately 4.45 miles (9 minutes driving time). The Postal Service's estimates this distance to be 3.3 miles.

travelling to and from a post office. *Id.* at 2-3. In addition, special provisions may be made for hardship cases or customers with special needs. *Id.* at 2, Concern No. 3

The Postal Service has adequately reviewed the effect of the South Greenfield post office's closure on the community.

Effect on Postal Services: Petitioner Ayers raises the concern that delivery route from Lockwood would delay mail delivery time and is too costly to be considered efficient. Participant Statement at 2. Again, when it comes to addressing the timeliness associated with the newly expanded Lockwood route, the Postal Service assures South Greenfield customers that a great deal of thought went into the route's restructuring. The Postal Service considers mail volume, energy efficient measures, and worked to "balance the need to deliver mail as early as possible with the need to minimize travel" so that mail can be provided in an efficient manner. FD at 3.

The Public Representative finds that on its face the Postal Service appears to have considered the effect on postal services and determined that establishing rural route carrier emanating from the Lockwood post office would provide regular and effective service to the South Greenfield community. FD at 2. However, it is important to note that to adequately determine whether something has actually considered requires evidence of consideration, i.e., more than a mere statement claiming that consideration has occurred.

Economic Savings: The Postal Service estimates closing the South Greenfield post office will save \$15,486, annually, with a one-time replacement cost of \$7,461. This one-time cost is derived from "the cost of delivering to an additional 55 boxes and adding 5 miles to the delivery route." Postal Service Comments at 10; see AR Item No. 17 at 2. The Public Representative finds that the Postal Service has inflated the total savings expected by including the salary of a South Greenfield postmaster and finds this to be sufficient grounds to remand the South Greenfield post office closure.

The South Greenfield postmaster resigned October 10, 2008, and was separated from service at that time. FD at 2, 9. Since then a non-career Officer-in-Charge has operated the office. Id. at 9. The Postal Service should calculate its current salary disbursements, i.e., the salary and any benefits paid to the non-career OIC, that have been sufficient to run the South Greenfield post office from October 10, 2008, until its determination to close in October 2011. Any and all South Greenfield savings attributable to the resigned postmaster have already been received at the time of postmaster's retirement in 2008. It is inappropriate to continue to attribute savings regarding a departed postmaster, ad infinitum.

The Public Representative finds that while the Postal Service did not properly consider the economic savings from closing the South Greenfield post office. The Public Representative urges the Commission to hold the Postal Service to task by requiring it use current accurate data supported by the record, to calculate the economic savings associated with any post office closing.

Conclusion. The discontinuance of the South Greenfield post office will have minimal effect on the South Greenfield post office community. The Postal Service will provide regular, and on its face efficient, retail and delivery services to the South Greenfield community. However, the economic savings reported by the Postal Service are based not substantially supported by the record. For this reason, the Public Representative recommends that the case be remanded for the Postal Service.

Respectfully Submitted,

/s/ Tracy N. Ferguson

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