

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

In the Matter of:
Randolph Post Office
Randolph, Iowa 51649

Docket No. A2012-111

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(February 24, 2012)

On December 30, 2011, the Postal Regulatory Commission (Commission) received an appeal from Vance A. Trively, Mayor of the City of Randolph, Iowa, objecting to the discontinuance of the Post Office at Randolph, Iowa.¹ The Postal Service filed the administrative record with the Commission on January 19, 2012. On January 20, the Commission issued Order No. 1154, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). Thereafter, Petitioner filed two Participant Statements with the Commission.

Petitioner raises three principal issues concerning the discontinuance: (1) the impact on the provision of postal services, (2) the impact upon the Randolph

¹ This discontinuance was conducted pursuant to Handbook PO-101, dated August 2004, and updated with Postal Bulletin revisions through August 2, 2007.

community, and (3) the calculation of economic savings expected to result from discontinuing the Randolph Post Office.

Background

The Final Determination To Close the Randolph, IA Post Office and Establish Service by Rural Route Service (“Final Determination” or “FD”),² as well as the administrative record, indicate that the Randolph Post Office provides EAS-11 level service to 88 P.O. Box customers, 77 rural route delivery customers, and retail and walk-in customers from 8:00 a.m. to 12:00 p.m. and 12:30 p.m. to 4:15 p.m. Monday through Friday and between 8:00 a.m. and 9:45 a.m. on Saturday.³ Retail services include the sale of stamps, stamped paper, and money orders; special services such as Registered Mail, Certified Mail, Insured Mail, COD Mail, and Express Mail services; and the acceptance and dispatch of all classes of mail.⁴ The postmaster position became vacant when the postmaster retired September 30, 2009. Since the postmaster vacancy, a non career postmaster relief (“PMR”), or officer-in-charge (“OIC”), was installed to operate the office. Postmaster level and office service hours are determined by a

² The Final Determination can be found at Item 47 in the Administrative Record. All citations to the Final Determination will be to “FD at _____,” rather than to the item number. The FD page number refers to the pages as marked on the upper left of the FD. Other items in the administrative record are referred to as “Item No. _____.”

³ FD at 2, Item No. 15, Post Office Survey Sheet; Item No. 18, PS Form 4920; Item No. 33, Proposal, at 2; Revised Proposal, at 2.

⁴ FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

workload analysis which includes the number of deliveries and revenue.⁵ When the study was conducted and the Final Determination was reached, the non career PMR was still serving as the OIC. If the Final Determination to discontinue the Randolph Post Office is affirmed, the non career PMR may be separated from the Postal Service; no other Postal Service employee will be adversely affected.⁶

The average number of daily retail window transactions at the Randolph Post Office is 13, accounting for 13 minutes of retail work daily.⁷ Revenue at the Randolph Post Office is low and has declined over the last three years, from \$18,378 in FY 2008 to \$17,758 in FY 2009 and \$14,720 in FY 2010.⁸

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route delivery emanating from the Malvern, IA Post Office. The Malvern Post Office,⁹ an EAS-18 level office located nine miles away,¹⁰ offers window service hours at the Malvern Post Office from 8:30 a.m. to 4:15 p.m. Monday through Friday and 9:00 a.m. to 10:00 a.m. on Saturday. There are 496 P.O. Boxes available at Malvern. Retail service is also available at the Tabor, IA Post Office, and an EAS-13 level office located 7.3 miles away.

⁵ FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

⁶ FD at 9; Item No. 33, Proposal, at 10; Item No. 41, Revised Proposal, at 10.

⁷ FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

⁸FD at 2; Item No. 18, PS Form 4920; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

⁹ The Malvern Post Office is not listed as a candidate for discontinuance as part of the Retail Access Optimization Initiative (PRC Docket No. N2011-1).

¹⁰ FD at 2; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

Window service hours at the Tabor Post Office are the same as at the Malvern Post Office.¹¹

The Postal Service followed proper procedures that led to the posting of the Final Determination. Issues and concerns raised by the customers of the Randolph Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements.¹² In addition to the posting of the Proposal and Final Determination at the Randolph, Malvern and Tabor Post Offices, customers received notice through other means. Questionnaires were distributed to all P.O. Box and rural route delivery customers of the Randolph Post Office. The questionnaires were also available to retail and walk-in customers over the counter at the Randolph Post Office¹³ and were accompanied by a letter from the Manager, Post Office Operations, Todd Case, which advised customers that the Postal Service was considering a possible change in the way postal services are provided to customers of the Randolph Post Office. The recommended change was tentative and would not lead to a

¹¹ FD at 2; Item No.18, PS Form 4920; Item No, 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2. The Tabor Post office also has 496 P.O. Boxes available (Item No. 18, Postal Service Form 4920).

¹² Between July 19, 2011 and September 19, 2011 the Proposal and Invitation for Comments on the Proposal to Close the Randolph, IA Post Office and Establish Service by Rural Route Service was posted at the Randolph Post Office, Malvern Post Office, and Tabor Post Office (FD at 2; Items 36 and 36A, Round Date Stamped Proposal and Round Date Stamped Invitation). The Final Determination was posted at the same three post offices on December 8, 2011 (Item No. 49, Round Date Stamped Final Determination Cover Sheets).

¹³ FD at 2; Item No. 20, Questionnaire Instruction Letter to Postmaster/OIC; Item No. 33, Proposal, at 2. Notice by these methods complies with all regulations in 39 C.F.R. Pt. 241.3 and procedures specified in Handbook PO-101.

formal proposal unless the Postal Service concluded that it would provide a maximum degree of regular and effective service.¹⁴ The Postal Service was considering whether to close the Randolph Post Office and provide delivery and retail services by rural route delivery under the administrative responsibility of the Malvern Post Office. The letter invited customers to complete and return the customer questionnaire.¹⁵ The Postal Service distributed questionnaires to 179 customers. Customers returned 47 questionnaires. The Postal Service characterized 2 as favorable, 22 as unfavorable and 23 as expressing no opinion.¹⁶ The Postal Service considered all the customer questionnaires. The Postal Service responded in writing to all customers who signed or affixed an address on the questionnaire.¹⁷ Customer comments and concerns, as well as the Postal Service analysis and responses, were reflected in the Proposal, the Revised Proposal, and the Final Determination.¹⁸

Representatives from the Postal Service were available during a community meeting on April 18, 2011 to answer questions and provide information to customers; 136 customers attended.¹⁹ During the meeting Postal

¹⁴ Item No. 21, Cover Letter, Questionnaire and Enclosure, at 1; Item No. 33, Proposal, at 2

¹⁵ Item No. 21, Cover Letter, Questionnaire and Enclosure, at 1; Item No. 33, Proposal, at 2.

¹⁶ FD at 2; Item No. 22, Returned Customer Questionnaires and Response Letters; Item No. 23, Customer Questionnaire Analysis; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

¹⁷ Item No. 22, Returned Customer Questionnaires and Response Letters.

¹⁸ FD at 2-9; Item No. 33, Proposal, at 2-9; Item No. 41 Revised Proposal, at 2-9.

¹⁹ Item No. 11. Petitioner asserts that 162 customers attended the meeting. Consistent with applicable procedures, the Postal Service made available Community Meeting Rosters for

Service representatives responded to questions and concerns from the attending customers.²⁰ The Postal Service also received a petition, containing 270 signatures, supporting retention of the Randolph Post Office.²¹ The Postal Service considered and addressed the concerns expressed in the petition in the Proposal, the Revised Proposal, and the Final Determination.²²

Customers received formal notice of the Proposal, which was posted with an invitation for public comment at the Randolph, Malvern and Tabor Post Offices for 60 days from July 19, 2011 to September 19, 2011.²³

Following posting of the Proposal on July 19, 2011, two unfavorable comments were received.²⁴ Since no substantial change was made to the initial

anyone wishing to document his/her attendance at the meeting. The rosters from the April 18, 2011 meeting (Item 24, Community Meeting Roster) indicate that 136 persons signed as being present. It is plausible that some customers chose not to sign. That is one reason why a discontinuance study process affords customers multiple avenues for providing their input: questionnaires, community meeting, written correspondence at any time. If those opportunities do not suffice, then formal comments on a proposal posted for 60 days provide an alternative means for submission of customer input. It is noteworthy that Petitioner does not challenge the Postal Service characterization of the customer concerns raised at the meeting (reflected in Item No. 25, Postal Service Customer Community Meeting Analysis). While the Proposal and the Revised Proposal state that no one attended the meeting, the Final Determination (at page 2) states that 136 persons attended. Thus the issue is not how many people attended, but whether customers were afforded an opportunity to attend a public meeting and to express their concerns. Customers concerns and Postal Service responses during the meeting were recorded and analyzed (Item No. 25, at 1-4).

²⁰ FD at 2; Item No. 25, Community Meeting. Analysis; Item No. 33, Proposal, at 2; Item No. 41, Revised Proposal, at 2.

²¹ The Petition (Item No. 27, at 1c to 1v) raised five issues: (1) the hardship on the community and businesses; (2) security of the mail; (3) ability to obtain money orders; (4) accountable mail; and (5) whether closing the Randolph Post office would achieve a maximum of effective and regular postal service to a rural area.

²² FD, at 2-9; Item No. 33, Proposal, at 2-9; Item No. 41, Revised Proposal, at 2-9.

²³ FD at 2; Item No. 36, Round Date Stamped Proposal; Item No. 36A, Round Date Stamped Invitation for Comment. See footnote 12 *supra*.

²⁴ FD, at 2-9; Item No 38, Proposal Comments and USPS Response Letters; Item No..40,

proposal, there was no need to modify the proposal other than to reflect the comments and Postal Service responses.²⁵ The Final Determination was posted at the Randolph Post Office, the Malvern Post Office and the Tabor Post Office on December 8, 2011, as confirmed by the round date stamped Final Determination.²⁶

In light of the postmaster vacancy, declining workload, the variety of delivery and retail options (including the convenience of rural delivery by highway contract route service), the expected financial savings, and limited effect on Postal Service employees,²⁷ the Postal Service issued the Final Determination. Regular and effective postal services will continue to be provided to the Randolph community in a cost-effective manner upon implementation of the Final Determination.

Issues raised by the Petitioner and customers are addressed in greater detail below.

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 Randolph Post Office on postal services provided to

Analysis of 60-day Comments; Item No. 41, Revised Proposal, at 2-9.

²⁵ Item No. 38, Proposal Comments.

²⁶ Item No. 49, Round Date Stamped Final Determination, at 1-3.

²⁷ FD at 11

Randolph customers. The closing is premised upon providing regular and effective postal services to Randolph customers.²⁸ .

Upon implementation of the Final Determination, delivery and retail services will be provided by rural route delivery service emanating from the Malvern Post Office. In addition to rural route delivery service, customers may also access postal services at the Malvern Post Office, located 9 miles away and retail services from the Tabor Post office, located 7.3 miles away. Customers can also visit any other Post Office proximate to their employment or other activities to complete postal transactions. The window service hours of the Malvern and Tabor Post Offices are from 7:15 a.m. to 4:15 p.m., Monday through Friday, and from 9:00 a.m. to 12:00 p.m. on Saturday.²⁹

Petitioner expresses concerns about of the effect on postal services of the Randolph Post Office closing, noting the convenience of the Randolph Post Office and requesting its retention. Petitioner asserts that service through the Malvern Post Office will not provide a maximum degree of effective postal services because: (1) the discontinuance of the Randolph Post Office is inconsistent with 39 U.S.C. §404(d)(2)(a)(iii); (2) customers should not have to travel 9 miles to Malvern or 7.3 miles to Tabor, thereby consuming time and money on gas to access services; (3) the impact on senior citizens and

²⁸ FD at 2,-6; Item No. 33, Proposal, at 2-6 .

²⁹ FD at 2; Item No. 18, Postal Form 4920, Post Office Fact Sheet; Item No. 33, Proposal, at 2; Item No. 41, Revised proposal, at 2.

customers with disabilities; (4) meeting the carrier at the resident's mail box is a problem; (5) delivery of large packages to customer residences; and (5) the rural route carrier may work irregular hours. These concerns were addressed and considered by the Postal Service and are addressed below.

Petitioner questions the consistency of the Proposal with provisions of Title 39. Pursuant to 39 U.S.C. §404(d)(2)(A)(iii)., the Postal Service, in determining whether to close a Post Office, must consider whether such closing is consistent with the policy that the Postal Service provide "a maximum degree of effective and regular postal services to rural areas, communities, and small towns where most offices are not self-sustaining." The Postal Service view is that the "a maximum degree" must be read in the context of related statutory provisions. It is a directive to recognize that special consideration must be given to the greater likelihood of dependence in rural communities and small towns on postal retail facilities for access to postal products and services; however, this concern must be balanced with Congressional mandates that the Postal Service execute its mission efficiently and economically. See sections 101(a); 403(a), (b)(1) and (b)(3); 404(d)(2) and 3661(a). Here, the Postal Service analyzed whether a maximum degree of effective and regular postal services to the area and community could be provided with rural delivery service in the absence of the Randolph Post Office, and the answer was affirmative.

Petitioner expresses concerns about customers traveling to the Malvern or Tabor Post Offices. Customers, however, will not be required to travel to another Post Office to receive or obtain delivery and most retail services. Many of these services will be provided by the rural route carrier at a roadside mailbox located close to customer residences³⁰. In hardship cases, delivery can be made up to ½ mile from the roadway to the home of a customer. Changes in the type of delivery are considered where service by existing methods would pose an extreme physical hardship for an individual customer. Requests for change in type of delivery can be submitted in writing to the Malvern Postmaster.

Petitioner repeatedly asserts that many Randolph customers work elsewhere, thus making travel to Malvern or Tabor a burden. Petitioner also alleges that the driving distance to Malvern and Tabor was not accurately calculated. As to the first point, Postal Service responses to many customer questionnaires reminded customers that they may chose to utilize P.O. Box service at the Malvern or Tabor Post offices, if they prefer.³¹ Of course, customers are not limited to using the Malvern or Tabor Post offices. They can use any post office that is convenient to their residences or places of work. As to the second point, other than the unsupported assertion, Petitioner offers no

³⁰ The Postal Service responded to many customers on this issue, pointing out that service provided at the post office will be available from the carrier, most transactions do not require meeting the carrier at the mailbox, and Stamps by mail and Money order Application forms are available from the carrier. Item No. 22, Customer returned Questionnaires and Response Letters, at 6, 19, 24, 39 and 47.

³¹ See Footnote 31, *supra*.

evidence that the mileage calculation is erroneous. Again, customers are not limited to using the Malvern or Tabor Post offices. They can utilize any Post Office convenient to their residences, places of work, and commute routes.

Many customers raised concerns about the impact of closing Randolph Post Office on senior citizens and customers with disabilities.³² The Postal Service explained that rural route carrier service is especially beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services via roadside mailboxes or cluster box units. Most transactions do not even require meeting the carrier at the mailbox. Customers do not have to make a special trip to the Post Office for service. Special provisions are made, on request, for hardship cases or special customer needs.³³

Some customers raised issues about the receipt of large parcels.³⁴ If a customer lives less than one-half mile from the line of travel, the carrier will attempt delivery of large packages to the customer's residence. If the customer lives over one-half mile away or is not home when delivery is attempted, a notice will be left in the mailbox. Attempted delivery items will be taken back to the

³² Item No. 22, Returned Questionnaires and Response Letters, at 13, 23 and 34.

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

³⁴ Item No. 22, Returned Questionnaires and Response Letters, at 14 and 21.

Malvern Post Office. Customers may pick up the item at the Post Office, request redelivery on another day or authorize delivery to another party.³⁵

In several returned questionnaires, customers raised a concern about irregular hours of rural route carrier.³⁶ Carriers have a schedule and are required to leave on time. However, there may be instances where various circumstances outside of the control of the Postal Service impact the delivery schedule. Despite these delays, carriers strive to serve the community in a timely fashion and on a regular basis.

Thus, the Postal Service properly concluded that Randolph customers will continue to receive regular and effective service by rural route carrier emanating from the Malvern Post Office.

Effect upon the Randolph Community

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

³⁵ FD at 3; Item No. 22, Returned Questionnaires and Response Letters, at 12 and 21; Item No. 25, Community Meeting Analysis, at 2; Item No. 33, Proposal, at 3.

³⁶ Item No. 22, Returned Questionnaires and response Letters, at 5, 11, 15, 25, 29, 36 and 46.

Randolph is an incorporated rural community located in Fremont County. The community is administered politically by a mayor and village board. Fremont County Sheriff's department provides police services, while fire protection is provided by the Randolph Volunteer Fire Department. Schools are provided by Tabor, Iowa Public Schools. The community is comprised primarily of farmers and agriculture-related workers, and those who commute to work in nearby communities or work at local businesses.³⁷ While there are a number of businesses and organizations, the questionnaires returned by Randolph customers indicate that, in general, the residents travel elsewhere for most other supplies and services.³⁸

Communities generally require regular and effective postal services and these will continue to be provided to the Randolph community. It is expected that rural route delivery service operated out of the Malvern Post Office will be able to handle mail delivery to Randolph customers. In addition, the Postal Service has concluded that other nonpostal services provided by the Randolph Post Office will be available at the Malvern and Tabor Post Offices. Government forms sometimes provided by the Post Office will also be available at the Malvern or Tabor Post Offices or customers can contact local government agencies.³⁹

³⁷ FD at 8; Item No. 16, Community Survey Sheet; Item No. 33, Proposal, at 8; Revised Proposal, at 8.

³⁸ FD at 8; Item No. 22, Returned Customer Questionnaires and Response Letters; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 8.

³⁹ FD at 8; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 8.

Moreover, as the Postal Service explained during the discontinuance study, a community's identity derives from the interest and vitality of its residents and their use of its name. Customers concerned about having to make an address change on their bank checks and stationery can continue to use the community name, Randolph, in the last line of the addresses; however, in order to ensure regular and effective service, the ZIP Code will change.⁴⁰

Petitioners also raise questions about the effect on the businesses of closing the Randolph Post Office. Petitioners were concerned that the loss of the Post Office would have a detrimental effect on the Randolph business community, specifically the Tri Valley Bank. There is no indication that the Randolph business community will be adversely affected. Businesses generally require regular and effective postal services and these will continue to be provided to Randolph businesses. The Postal Service addressed the services available to the Tri Valley Bank specifically.⁴¹ The questionnaires returned by Randolph customers indicate that, in general, the Randolph residents will travel elsewhere for other supplies and services, but will continue to use local businesses if the Randolph Post Office is discontinued.⁴²

⁴⁰ FD at 8; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 8.

⁴¹ Item 41, Revised Proposal, at 4.

⁴² FD at 8; Item No. 22 Returned Customer Questionnaires and Response Letters; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 8.

In sum, 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 Randolph Post Office on the community and businesses served by the Randolph Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as required by 39 U.S.C. § 404(d)(2)(A)(iv). The estimated annual savings associated with discontinuing the Randolph Post Office are \$44,802. 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 and consistent with the mandate in 39 U.S.C. §404(d)(2)(A)(iv).

The Petitioners question the listed economic savings, noting that the calculation does not account for a number of factors. Each of those factors is addressed below.

Petitioner contends that the Postal Service savings estimate is incorrect because a career Postmaster salary and fringe benefits were used in the calculation, in lieu of the lower income earned by the OIC. The Postal Service notes, however, that it was appropriate to use a career Postmaster's salary in the calculation because it is the proper measure of the loss of a permanent position and the career position would ultimately have been filled if the Randolph Post Office had not been identified as a candidate for

discontinuance. Thus, the Postal Service will save the salary and benefits of a career Postmaster position; the costs were properly included in the Postal Service estimate.

Petitioner states that the Postal Service did not factor in the amount that the Postal Service will have to pay in rent on the property that it continues to lease in Randolph (\$10,059 a year). The lease expires on August 31, 2018 and does not have an early termination clause.⁴³ The lease cost savings will arise from that point forward, and perhaps earlier if the Postal Service is able to sublease the property. Therefore, it is not necessary to deduct \$10,059 from the anticipated annual savings on a long term basis. Moreover, even if the Postal Service did have to continue to pay rent through the end of the lease term, the amount in question is a small fraction of the overall estimate of economic savings.

Petitioner challenges the Cost Analysis on grounds that only a small amount of savings will be achieved by discontinuing the Randolph Post Office. In his letter of appeal and Participant Statement, Petitioner asserts that operation of the Randolph Post Office does not cause a financial loss for the Postal Service. This is another way of saying that the savings achieved by closing small rural Post Offices would not affect the Postal Service's entire operational budget. While this may seem insignificant to Petitioner, it is significant to the overall cost

⁴³ Item No. 18, Postal Form 4920.

reduction focus of the Postal Service. The Postal Service is looking at all opportunities to operate efficiently and provide effective and regular service. While the savings from any given initiative may seem small, these savings can make a difference when added together.

Petitioner criticizes the Postal Service for failing to account for additional costs that will supposedly be incurred to pick up and deliver mail throughout the community, and the alleged lost revenue attributable to the discontinuance of the Randolph Post Office. Notwithstanding Petitioners' complaint, the Postal Service applied its standard financial analysis which accounts for the following cost drivers: the number of additional boxes to be added to the contract or rural route; the additional volume that may be expected per additional box; the number of additional miles to be added to the route; and the total additional annual hours that will be required to service the route. The Postal Service approach is both defensible and reasonable; moreover, it is efficient while adding comparability across discontinuance studies. The administrative record accounts for the estimated cost of adding customers to the rural route carrier out of the Malvern Post Office using a conservative, worst case analysis. Petitioner does not demonstrate with any certainty that the Postal Service will lose revenue as a result of the discontinuance of the Randolph Post Office, and any projections regarding lost revenue would require speculation by the Postal Service. In short,

none of the Petitioner's arguments affect either the magnitude (many thousands of dollars annually) of savings from discontinuance of the Randolph Post Office.

Petitioner asserts that the Postal Service does not receive tax payer funds and, therefore, does not contribute to the national deficit. Pursuant to 39 U.S.C. § 404(d)(2)(A)(iii), in determining whether to close a Post Office, the Postal Service must consider whether such closing is consistent with the policy that the Postal Service provide "a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining." The consideration of the effect of these costs on the national deficit is not a factor under Title 39. In this case, consistent with Title 39, the Postal Service analyzed whether a maximum degree of effective and regular postal services to the Randolph area and community could be provided with rural delivery service in the absence of the Post Office, and the answer was affirmative.

Thus, the conclusion that replacement service by rural route delivery together with the range of alternative ways of accessing retail services available would lead to significant savings is sound. Most pick up and delivery of mail will be accomplished by the rural route carrier, whose minor costs increases have been included in the cost analysis. The Postal Service estimates are supported by record evidence and are in accordance with applicable 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 former Postmaster retired on September 30, 2009. A PMR was installed as the temporary officer-in-charge (OIC). The non career PMR may be separated from employment. The record shows that no other employee would be adversely affected by this closing.⁴⁴ Therefore, in making its determination, the Postal Service considered the effect of closing on employees at the Randolph Post Office, consistent with its statutory obligations. See 39 U.S.C. §404(d)(2)(A)(ii).

Other Issues

Without citing credible evidence, Petitioner asserts that the result of the discontinuance study and the final determination to close the Randolph Post Office was predetermined. However, local field personnel further could not predetermine the outcome, because the final determination was approved at Headquarters upon review of the information compiled in the administrative record.

Conclusion

As reflected throughout the administrative record, the Postal Service has followed proper procedures and carefully considered the effect of closing the

⁴⁴ FD at 9; Item No. 33, Proposal, at 8; Item No. 41, Revised Proposal, at 8.

Randolph Post Office on the provision of postal services to the Randolph community, the impact on the community and local businesses, 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, 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 Randolph customers. 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 Randolph Post Office should, accordingly, be affirmed.

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

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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