

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

In the Matter of:

Participant Reply to USPS Comments Docket No. A2012-100
Jonesville Post Office
Jonesville, Texas 75659

LELIA VAUGHAN RESPONSE REGARDING USPS COMMENTS ABOUT THE APPEAL
(February 27, 2012)

The United States Postal Service (USPS) filed an Answering Brief on February 16, 2012 in response to the Petitioner's Appeal Letter statements filed on December 19, 2011 and References cited in that Appeal Letter which were filed on December 27, 2011. In the answering brief, the USPS attempted to rebut the documentation of errors committed by USPS as detailed in the Petitioner's Appeal Letter statements. The Petitioner stands firmly behind all of the information the Petitioner has submitted to the Postal Regulatory Commission. The Petitioner will let the original Appeal Letter and corresponding References stand on their own and only address the most serious claims of USPS in their answering brief.

Participant Response to Introductory Comments in USPS Answering Brief

1. Lelia Vaughan's name is incorrectly spelled in the USPS Answering Brief.
2. Lelia Vaughan filed all supplemental materials in support of references cited in the Appeal Letter. Those references could not be uploaded to Postal Regulatory Commission on December 19, 2011 with the Appeal Letter due to the size of the files. Those references were mailed on the afternoon of December 19th by USPS

Priority Mail, but were not received by PRC docket staff until December 27, 2011.

3. Footnote 2 on page 1 of the answering brief incorrectly identifies Ellen Vaughan Miller's name as Ellen Vaughan.

Participant Response to Background Section pages 3 -7

1. There were 123 post office boxes rented as of August 27, 2011. The number of rented boxes was discussed at the community meeting attended by the Area Manager and District Discontinuance Coordinator. Subsequent letters in the references further made corrections. On December 19, 2011 there were 127 post office boxes rented.

On February 24, 2012 there were 126 post office boxes rented. USPS only used 111.

2. USPS did not follow all proper procedures that led to the Final Determination.

There was no public announcement of the community meeting prior to the meeting date. No notices, proposals, or documents were placed in the Karnack Post Office which has rural routes extending into the northern areas of Jonesville. The Jonesville notification letter did not inform customers that additional questionnaires were available for submission. Furthermore, no questionnaires were on put on display in the post office nor were notices put in the lobby. Customers could not possibly have known to ask for questionnaires about which they had no knowledge. USPS failed to respond to all inquiries and comments, and responses that were received failed to address all stated concerns and questions. USPS failed to include all customer inquiries and letters in the official record. USPS failed to show documentation for changes made to the Proposal and the Final Determination. A revised proposal was not provided to customers of Jonesville Post Office for review. USPS made changes to the record after

the customer comment period had ended on October 24, 2011. USPS did not incorporate all known and correct information which should have been entered into the official record.

3. Customers did not receive notice of the Final Determination by any other means than posting of the Final Determination Official Record in the lobby of the post office.

4. In response to USPS Footnote 12, page 4, the petitioner submitted concerns about the questionnaire and the interpretation and evaluation of responses. Documentation for the petitioner's concerns are in the Appeal Letter References filed December 27, 2011. USPS did not respond to letters of concern about the questionnaires and the potential for skewed interpretation. Petitioner holds a doctoral degree and has had extensive research and evaluation education and experience. Petitioner arguments emerged from evaluation expertise and are supported by proven research standards.

5. USPS did not address all concerns expressed in comments attached to the official questionnaire. Review of petitioner's letters and vague USPS responses will verify USPS disregard for questions and failure to provide appropriate responses.

6. In response to USPS Footnote 21, page 6, Jonesville's old country store is the oldest continuously operating store in the State of Texas. As such, tour buses, groups, and visitors from various states journey to see the old historic store. Many visitors use the Jonesville Post Office for buying stamps and mailing postcards and letters. It is not uncommon for tourist attractions to lure visitors who patronize the local post office. Petitioner submitted the non-resident signatures with a qualifying statement which separated those non-resident signatures from resident petition signatures. The

cover page and explanation paragraph which preceded those actual signature pages was entitled "PETITION SIGNATURES FROM CONCERNED CITIZENS."

The cover page was excluded from the official record by USPS district officials for unknown reasons, but the page explained rationale for signatures as submitted.

The first and last sentences on that cover page clearly stated:

Attached are petition signatures from area and regional citizens of the United States who oppose the proposed discontinuance of Jonesville Post Office 75659 due to significant negative impacts on the historical Jonesville community....Please accept these signatures as evidence that Jonesville needs a post office and that discontinuance would have widespread negative effects as well as those burdens placed on residents and customers of the Jonesville Post Office.

Serious concern exists about why USPS district officials excluded the cover page from the official record just as similar concerns have been expressed about why USPS district officials did not include in the official record all written customers' letters and concerns. Both types of exclusion fail to adhere to Handbook PO 101 of July 2011.

7. USPS has not fully considered impacts of closing the Jonesville Post Office and the provision of services because USPS has not taken into consideration that Karnack Post Office and Waskom Post Office both provide rural delivery service to areas comprising Jonesville. Also, Jonesville Post Office is the only post office in the area which provides window service on Saturdays. Closure would end that service in the area.

8. The official record contains information from the Harrison County Sheriff's Department regarding 5 burglaries and thefts in Jonesville 75659 during the six months prior to August 27, 2011. Theft is a real concern in unincorporated rural areas which do not have a regular law enforcement presence. USPS responses to customer concerns

advised putting a lock on the mail box to avoid thefts. The standard inexpensive roadside mailbox known to the general public cannot be locked in such fashion as USPS advice suggests. While some styles of mail boxes can accommodate locks or are equipped with key entry, such mail box purchases could impose financial burdens on low income citizens. Lack of sensitivity to real concerns is disrespectful.

Participant Response to Effect upon Jonesville Community

1. In order to fully consider effects on a community, accurate data and descriptors such as geographic location, size of the community, population characteristics, and the number of businesses and organizations in the community should be properly gathered and documented. The Area Manager and District Manager approved and signed the Proposal for Discontinuance which was based on faulty, inaccurate, and shallow descriptions of the community. USPS reported in the proposal only one business, no churches, and a population comprised of 50% retirees and 50% commuters. None of those facts were correct. Residents submitted extensive material to correct USPS's mistakes. The final official record contains changes to the population description, but the official record only acknowledges "approximately 12 businesses." There are many more. No opportunity was granted to peruse the revisions during the comment period or before the final record was filed. The final record is incomplete. Residents should have been given a review opportunity before records were finalized.
2. It is clear that USPS officials do not have understanding of the geographical location of Jonesville in relation to rural delivery routes emanating from Waskom and Karnack post offices. Uncertainty exists relative to current Jonesville rural delivery residents

whose addresses are identified with the name of Waskom 75692 and whose addresses would need to be changed to reflect the town name of Jonesville, Similarly, uncertainty exists relative to Jonesville post office mail box holders who currently reside in rural delivery areas served by Karnack Post Office. Use of the town name of Jonesville and Zip Code 75659 by all persons residing in the unincorporated area would alleviate such confusion.

3. Community identity in small rural communities and particularly in unincorporated rural areas is derived by much more than the residents' use of their town name. Geographic location through the use of global positioning systems and modern electronic mapping technologies is often correlated town and zip code labeling. If a community maintains its name and yet the zip code is affiliated with another community, confusion is the result. Physical location difficulties could best be minimized with full use of the name Jonesville and Zip Code 75659 for all areas within the geographical location historically known for years as Jonesville.

4. Location of a post office can impact residents and businesses that cannot depend on rural delivery of valuable mail to an unattended roadside mail box in areas without regular law enforcement presence such as in Jonesville. While the option exists to drive to a neighboring post office, the required driving imposes burdens of driving time, financial costs, and time away from work. Some residents and businesses are situated five miles to the north of Jonesville Post Office and ten or more miles away from Waskom Post Office or any other post office.

5. Repeated expressions of concern for the retention of both the town name of

Jonesville and the current 75659 Zip Code received minimal response from the Area Manager and District Manager. All Jonesville residents should be required to use Jonesville as the town name regardless of which post office provides rural delivery. No substantiating rationale has been given regarding why Jonesville residents could not continue to use 75659 Zip Code. The Zip Code delineates area for delivery.

Participant Response to USPS Economic Savings

1. The official record indicates that Jonesville Post Office has had workload of 2.2 and a steadily increasing revenue over the past few years. The estimated annual savings projections of \$28,525 was not reported in the proposal, but was included in the USPS Reply Brief with a reference to Footnote 36, Item 8, Final Workbook. The projected annual \$28,525 savings when and if the most current revenues of \$26,379 are considered would render a savings of only \$2146 per year. Ten year savings shown in the Official Record displayed in Jonesville Post Office indicates that annual savings would be \$22,647.10. When that numerical amount is subtracted from the most recent \$26,379 revenues reported for 2011, Jonesville Post Office could render a profit of \$3731.90 per year. A small rural post office which shows potential for revenue growth and self-sustainability should not be closed.
2. If it is “not unreasonable to assume little or no change in customer usage patterns” USPS could expect to experience continued trend of increases in mail box rentals, increases in revenues, and increases in customer demand in Jonesville. Numbers have been increasing over the past four years as demonstrated by the official record and the documentation provided by the current rental figures for Jonesville Post Office.

3. A Memo to Record was filed on the same date the USPS Reply Brief was filed, February 16, 2012. The addendum addressed costs of providing rural delivery service for only 111 Jonesville post office box holders. Theoretically, use of lower and outdated post office box rentals numbers cannot justify projected cost limits. The projection based on only 111 post office box holders rendered a maximum annual cost of \$10,463 per year. Totals would be more significant if current rental figures had been utilized in the calculations. With costs of \$10,463 per year compared to annual projected savings of only \$2146 which considers expenses and revenue, continuing the post office seems less of a burden. Similarly, with costs of \$10,463 per year compared to the projected profit of \$3731.90 which considers \$22,647 expenses and \$26,378 revenues, continuing the Jonesville Post Office seems the best option.

4. USPS did not show any costs for removing all USPS property and contents from the building. There would be labor and relocation costs for removal of such property while at the same time protecting and maintaining the integrity of the building.

5. While USPS asserts that closing Jonesville Post Office is a more cost-effective solution than continuance of the post office in service, slight reduction in hours of operation coupled with the positive trend of revenue increases could further enhance self-sustainability, minimize the impact on the full community, and provide for continual maximum degree of service in Jonesville's small rural unincorporated community. Both USPS cost savings analysis scenarios reflect that continuation of Jonesville Post Office is warranted and the best option. When full realm of hypothetical savings and costs are compared to the potential benefits of continuation, there should be no doubts that

Jonesville Post Office should be continued.

Participant Response to USPS Reply Brief on Effect on Employees

Until USPS considers the complexities related to involvement of two neighboring post offices which render rural delivery to areas in geographical Jonesville to the north, south, east, and west of Jonesville Post Office, USPS cannot state that other employees would not be adversely affected. That conclusion cannot be accurately made until all factors are considered.

Participant Concluding Remarks in Response to USPS Reply Brief

While USPS has stated that proper procedures have been followed and careful consideration has been given to all matters relative to the effects of closing the Jonesville Post Office, petitioner has reported many discrepancies in that purported assertion. Incomplete entries in the official record, cost/revenue analysis better than projected rural delivery cost analysis, use of outdated USPS records on post office box rental numbers, lack of consideration for all three post offices currently providing service to residents of Jonesville, and disregard for the current documented increases in revenue and customer demand must not be overlooked. Any decision made to close a productive small rural post office of such significance to the community, state, and region without proper consideration of all facts, data, and potential impacts, would certainly represent carelessness, lack of reason, and arbitrary disregard for inherent benefits of continuation of the post office. Closure of Jonesville Post Office 75659 does not constitute a relevant action which could produce financial benefits while not sacrificing maximum degree of service, subjecting postal patrons to hardships, and

damaging what has been demonstrated to be very loyal patronage to Jonesville Post Office and to the United States Postal Service. . Petitioner respectfully requests that the Postal Regulatory Commission remand the USPS final determination to close the Jonesville, Texas Post Office.

Respectfully submitted,

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Participant, Resident, Business Owner, and Postal Patron
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