

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

COMPLAINT OF JAMES D. GOODMAN AND
ROSALYN GOODMAN

Docket No. C2015-2

**UNITED STATES POSTAL SERVICE MOTION TO DISMISS
THE COMPLAINT OF JAMES D. GOODMAN AND ROSALYN GOODMAN**
(May 14, 2015)

INTRODUCTION

On April 23, 2015, James D. Goodman and Rosalyn Goodman (collectively “Complainants”) filed a complaint with the Postal Regulatory Commission (Commission).¹ The Complaint contains allegations concerning a federal criminal statute regarding mail obstruction (18 U.S.C. § 1701); the Americans with Disabilities Act; and a provision of the Postal Accountability and Enhancement Act (PAEA) which required the Postal Service to consider specific factors when it established modern service standards (39 U.S.C. § 3691(c)(2)). The Complaint arises from disruption of mail service to Complainants’ home resulting from interference by Complainant’s dog. Though the Postal Service offered several different avenues to address this issue, Complainants instead resorted to litigation. Complainants have unreasonably refused to comply with standard measures designed to protect postal workers. Mail carriers suspended delivery service of parcels and accountable mailpieces to Complainants’

¹ Complaint of James D. Goodman and Rosalyn Goodman (Complaint), Docket No. C2015-2, (April 23, 2015).

door after Complainants' dog interfered with delivery on at least four occasions. Resolution of this grievance would be as simple as assuring the Pomona Post Office that the dog will be restrained during delivery hours to ensure the safety of postal employees.² Complainants, however, seek to restore delivery of parcels and accountable mailpieces to the door without any showing that the dog interference with delivery has been eliminated. Instead, Complainants have resorted to the burdensome litigation process, needlessly expending valuable resources for all parties involved.

Pursuant to 39 C.F.R. § 3030.12(b),³ the United States Postal Service hereby moves to dismiss the Complaint with prejudice. As described in detail below, multiple grounds for dismissal exist, including failure to state a claim upon which relief may be granted, failure to exhaust available administrative remedies, and procedural defects. Accordingly, the Postal Service respectfully requests that the Commission dismiss this Complaint, and instead treat this situation as a service inquiry pursuant to 39 C.F.R Part 3031.

FACTUAL BACKGROUND

The Complaint involves the provision of delivery service by the Postal Service to 1600 Entre Colinas Place, Pomona, California 91768. This physical address receives curbside delivery, which does not require the city carrier to dismount from his or her

² It is fitting that this motion is filed just days before National Dog Bite Prevention Week, a public service campaign to bring attention to one of the nation's most commonly reported public health problems: dog attacks and bites. Dog attacks and dog bites are a serious threat to letter carriers. In 2014, over 5,700 letter carriers were victims of dog attacks or bites. This is an increase of over 100 compared to 2013. Postal Bulletin, PB 22414, (April 30, 2015) at 3; available at: <http://about.usps.com/postal-bulletin/2015/pb22414/pb22414.pdf>. See also Postal Bulletin, PB 22388, (May 1, 2014) at 3; available at: <http://about.usps.com/postal-bulletin/2014/pb22388/pdf/pb22388.pdf>.

³ Pursuant to this rule, the Postal Service's Answer is deferred. If the Commission denies the Postal Service's motion or postpones disposition, the Postal Service's answer is due within 10 days of the Commission's action.

vehicle to deliver mail to the mail receptacle. By letter dated January 8, 2015, the Postal Service informed Complainants that, as a result of interference by an unrestrained canine, the carrier was unable to deliver mail to that address. In a conversation between Complainants and the delivery supervisor for the Pomona Post Office, Complainants were informed that for the safety of Postal Service employees, deliveries to the door at that address had been suspended.

In the January 8, 2015 correspondence, the Postal Service informed Complainants that to restore delivery, Complainants should consult with a delivery supervisor, and when doing so, Complainants should furnish a copy of the dog's current license and rabies vaccination certificate. Complainants were provided a copy of the Postal Service's policy stating that while carriers make every effort to deliver mail, they are not required to deliver mail where dogs or other animals interfere.⁴ Complainants were also provided a copy of California Civil Code section 3342, which outlines civil liability as it applies to dog bites.⁵

Since Complainants receive curbside delivery, which does not require the letter carrier to dismount from his or her vehicle, the Postal Service never suspended delivery service to Complainants' curbside mailbox. The city carrier delivers unaccountable mail and small parcels that will fit inside the curbside mail receptacle. On a few occasions since January 9, 2015, the city carrier has attempted to deliver larger parcels or

⁴ See Notice 204, Dog Days, Post Offices Brace for Summertime Bites (Notice distributed to customers reminding customers to do their part in preventing dog bites to letter carriers), available at: <http://about.usps.com/notices/not204.pdf>; Handbook M-41, City Delivery Carriers Duties and Responsibilities, Section 133.5 (which provides that carriers are not required to deliver mail where dogs or other animals interfere.); Handbook EL-814, Postal Employee's Guide to Safety, Section IX.D,1 (2013) (which provides that carriers are not required to deliver mail when an animal threatens them.).

⁵ Cal. Civ. Code § 3342.

accountable mail, which requires customer signature, to the door. However, the unrestrained dog continues to interfere with delivery. On these occasions, the Postal Service informed Complainants via a Form 3849 notice that the carrier was unable to deliver a parcel or accountable mailpiece.

Since receiving the January 8, 2015 letter, Complainants have not taken the requested actions to restore parcel and accountable mail delivery. While Complainants have spoken with a delivery supervisor, they have refused to provide the requested documentation or commit to restrain the animal so that it would no longer interfere with delivery of larger parcels or accountable mailpieces.

ARGUMENT

I. THE COMPLAINT FAILS TO STATE A VALID CLAIM UNDER THE COMMISSION'S COMPLAINT JURISDICTION.

Congress has provided the Commission limited jurisdiction to entertain complaint cases against the Postal Service. Specifically, the Commission's authority to adjudicate complaints, which is set forth in 39 U.S.C. § 3662(a), allows an interested person to bring a complaint when "the Postal Service is not operating in conformance with the requirements of the provisions of sections 101(d), 401(2), 403(c), 404a, 601, or [chapter 36] (or regulations promulgated under any of those provisions)."

The Commission has consistently held that its jurisdiction is limited to alleged violations of sections enumerated in 39 U.S.C. § 3662 and has repeatedly dismissed claims alleging violations of sections not enumerated under section 3662 for lack of jurisdiction. As a recent example, in Docket No. C2015-1, the complainants argued that the Commission had jurisdiction to consider alleged violations of sections 404(a) and 410(b)(2). In Order No. 2377, the Commission held that it did not have jurisdiction over

such claims because these sections were not enumerated under section 3662.⁶ Similarly, in Order No. 1762 in Docket Nos. C2013-3 to C2013-9, the Commission dismissed local APWU chapters' claims advanced under section 302 of the Postal Accountability and Enhancement Act of 2006 because that section was not codified in chapter 36 and thus it was not an enumerated provision in section 3662.⁷

In this instance, Complainants allege that the Postal Service violated 18 U.S.C. § 1701 (obstruction of mails generally) and unspecified portions of the Americans with Disabilities Act. None of these allegations involve enumerated provisions in 39 U.S.C. § 3662(a) and thus they do not serve as a valid basis for a complaint with the Commission.

Furthermore, Complainants' allegation that the suspension of parcel and accountable mail delivery violates 39 U.S.C. § 3691(c)(2) fails to state a claim upon which relief can be granted. Complainants' claim concerning an isolated safety incident is unrelated to section 3691. As the Commission recognized in Order No. 1762, section 3691 required the Postal Service, in consultation with the Commission, to establish a set of modern service standards for market-dominant products.⁸ Section 3691(c) outlines specific factors that the Postal Service was required to consider when establishing these modern service standards. These factors included customer

⁶ Order Granting Motion to Dismiss, Order No. 2377, Docket No. C2015-1 (Mar. 4, 2015) at 6. *See also* Docket No. C2010-2 (Commission dismissed Complainant allegations that the sale of the Queen Anne Station did not comply with title 39 and various Postal Service rules and regulations because none of the allegations in the complaint implicated any of the enumerated provisions in 39 U.S.C. § 3662).

⁷ Order Dismissing Complaints, Order No. 1762, Docket Nos. C2013-3 to C2013-9 (June 26, 2013) at 10.

⁸ 39 U.S.C. § 3691(a). *See* Order No. 1762 at 10.

satisfaction and the needs of customers, including those with physical impairments.⁹ The Postal Service considered these statutory factors when establishing the modern service standards for market dominant products.¹⁰ Moreover, Complainants acknowledge the Postal Service's consideration of the statutory factors when they copied passages from the Postal Service's exhaustive consideration of these factors into section II.C of the Complaint.¹¹ The Complaint itself admits that the Postal Service met its obligations under section 3691(c). Since Complainants' allegations involve an isolated incident and do not implicate the process by which the Postal Service established the modern service standards, Complainants did not allege a violation of section 3691. Accordingly, Complainants failed to state a claim upon which relief may be granted and the Commission should dismiss the Complaint.

II. THE COMPLAINT SHOULD BE DISMISSED BECAUSE COMPLAINANTS FAILED TO EXHAUST AVAILABLE ADMINISTRATIVE REMEDIES.

Even if the Complaint alleged claims properly within the Commission's jurisdiction, the Commission should decline to entertain the Complaint because Complainants have failed to exhaust procedures expressly made available to them. The Postal Service provides an administrative remedy whereby "[a]ny postal customer may complain or inquire about postal products, services, or employees at any Post Office or directly to the [Postal Service] Consumer Advocate."¹²

⁹ 39 U.S.C. §§ 3691(c)(2) and (3).

¹⁰ 72 Fed. Reg. 58965 (2007)(codified at 39 C.F.R. Parts 121 and 122).

¹¹ Complaint at 5-7.

¹² Domestic Mail Manual, Section 608.6.1 Consumer Complaints and Inquiries, available at: <http://pe.usps.com/text/dmm300/608.htm#1256084>.

The Postal Service offers a myriad of methods by which a customer may initiate a service complaint or inquiry, including in person, by telephone, by e-mail, or by letter. There are established guidelines to ensure that the appropriate office responds to a customer's complaint, regardless of the complaint's form. These established guidelines include a series of escalation if the initial point of contact cannot achieve resolution to the customer's satisfaction. Moreover, a customer who is dissatisfied with the local handling of a complaint or inquiry may send a written appeal to the Consumer Advocate.¹³ Here, there is no record of Complainants initiating a service complaint. To the contrary, Complainants did not accept an invitation from local officials to discuss the situation and efforts to restore service. Complainants should not be rewarded for preferring costly litigation over a more streamlined process created specifically for this type of service concern. As discussed in Section IV, the Commission should not become a venue for customers to litigate isolated service complaints and inquiries better suited to the established processes with Postal Service employees and management.

Although the "exhaustion" doctrine applies to Article III courts applying the Constitution's "Case or Controversy" requirement, there are sound policy reasons for the Commission to apply a similar approach in this case. The "exhaustion" doctrine dictates that "no one is entitled to judicial relief for a supposed or threatened injury until the prescribed administrative remedy has been exhausted."¹⁴ The primary purpose of

¹³ *Id.*

¹⁴ *Myers v. Bethlehem Shipbuilding Corp.*, 303 U.S. 41, 50-51 (1938). See *McKart v. U.S.*, 395 U.S. 185, 194 (1969). See also *Montes v. Thornburgh*, 919 F.2d 531, 537 (9th Cir. 1990) (describing the policy rationale for a "prudential" exhaustion doctrine, even where not required by statute, as follows: "(1) agency expertise makes agency consideration necessary to generate a proper record and reach a proper

the exhaustion doctrine is the avoidance of premature interruption of the administrative process.¹⁵ The administrative process serves many objectives, which include allowing the agency to develop the necessary factual background and providing an opportunity for the agency to exercise its discretion or apply its expertise.

The rationale expressed by Article III courts applies in this case as well. First, as described above, the Postal Service has procedures in place by which customers may submit complaints and inquiries related to service. These procedures ensure that such complaints and inquiries are addressed in a timely manner and provide customers who are unsatisfied with the outcome an opportunity to escalate their complaint or inquiry. Second, Complainants should not be encouraged to deliberately bypass the specific processes designed to address such matters. Third, efficient use of Commission resources recommends against entertaining a complaint when the Postal Service still has multiple opportunities to reconsider. Thus, even if the Complaint were within the Commission's jurisdiction (which it is not), Complainants have yet to exhaust available administrative remedies.

III. THE COMPLAINT SHOULD BE DISMISSED ON PROCEDURAL GROUNDS.

The Commission should also dismiss the Complaint for failing to comply with the precondition of 39 C.F.R. § 3030.10(a)(9) to meet or confer prior to filing the complaint before the Commission. Complainants should be foreclosed from bringing their action for failing to make a meaningful attempt to resolve or settle this dispute prior to filing

decision; (2) relaxation of the requirement would encourage the deliberate bypass of the administrative scheme; and (3) administrative review is likely to allow the agency to correct its own mistakes and to preclude the need for judicial review").

¹⁵ *McKart*, 395 U.S. at 194.

their Complaint. Accordingly, the Complaint should be dismissed on this separate basis as well.

The Commission clarified the level of effort necessary to comply with this requirement in its Order No. 195, *Order Establishing Rules for Complaints and Rate or Service Inquiries* (Order No. 195). As a prerequisite to filing a complaint, complainants must first notify the Postal Service's General Counsel of their concerns and permit the parties to meet or confer regarding them. Thereafter, the Postal Service is provided a reasonable time to resolve the issue(s), inform complainants that more time is required, or inform complainants that resolution is unlikely. As the Commission explained, "[t]he goal of the meet or confer provision is to ensure that complainants attempt to resolve their issues with the Postal Service prior to bringing a more formal proceeding to the Commission for its consideration."¹⁶ However, to achieve this end, the parties must be permitted a reasonable opportunity in which to do so.

Complainants state that "reasonable attempts have been made to the Postal Service's General Counsel" to meet or confer prior to filing the complaint and they attached two exhibits as evidence of these reasonable attempts: Exhibit B and Exhibit C.¹⁷ However, neither exhibit furnished in conjunction with the Complaint supports their claim that a reasonable attempt to meet or confer with the Postal Service's Office of General Counsel. First, Exhibit B relates to Complainants' request for records pursuant to the Freedom of Information Act (FOIA).¹⁸ The January 10, 2015 request for records contains no request to meet or confer to attempt to resolve or settle an anticipated

¹⁶ Order No. 195 at 15-16.

¹⁷ Complaint at 9.

¹⁸ Complaint at 14.

complaint to be filed with the Commission. In fact, the request for records makes no reference to an anticipated complaint.

As a government agency, the Postal Service receives numerous requests for records each year. Specifically, in fiscal year 2014, the Postal Service received 1,673 requests for records pursuant to FOIA.¹⁹ There is nothing unique about Complainants' request to indicate that it should receive special treatment outside of the Postal Service's established procedures for accepting and responding to a request for records. Furthermore, contrary to Complainants' allegations, the Postal Service responded to the January 10, 2015 request for records.²⁰ On February 20, 2015, the Postal Service granted in part and denied in part Complainants' request.²¹ The Postal Service provided two responsive records and denied the remainder of the request on the grounds that the responsive records contained personnel and employee information exempt from mandatory public disclosure.

Second, Exhibit C appears to be an earlier draft of the complaint. However, there is no indication that this draft was sent to the Postal Service generally, or to Office of General Counsel specifically. Moreover, Exhibit C does not indicate when Complainants sent this draft document to the Postal Service's Office of General Counsel.

The first correspondence regarding the instant Complaint was received on April 21, 2015, just two days before Complainants filed the Complaint before the

¹⁹ United States Postal Service, "FOIA Report for Fiscal Year 2014" at 12; available at: <http://about.usps.com/who-we-are/foia/annual-foia-reports/fy2014.pdf>.

²⁰ See Exhibit 1.

²¹ Exhibit 1 at 1.

Commission. The initial correspondence received by the Postal Service's Office of General Counsel included a copy of the Complaint sent to its e-mail account that receives service of complaints filed before the Commission. The April 21, 2015 correspondence was not styled as a request to meet or confer with the Office of General Counsel prior to the filing of a complaint, but rather the correspondence fulfills the separate requirement that complainants serve a copy of the complaint to the Postal Service's Office of General Counsel.²² Even if the April 21, 2015 correspondence was styled as a request to meet or confer, two days is hardly sufficient time for the Postal Service's Office of General Counsel to make the necessary preparations to meet or confer regarding Complainants' allegations and requests for relief. In sum, the Complaint should be dismissed for failing to comply with the procedural requirements of 39 C.F.R. § 3030.10(a)(9).

Furthermore, the initial filing names the Postal Service and three individuals as defendants in this Complaint: "Patrick A. Donahoe, as Postmaster General, U.S. Postmaster, Pomona, California, and Alejandro L. Peralta , individually and as Supervisor, Pomona Post Office."²³ Each of the three individuals is or was an employee of the Postal Service and is not personally subject to the jurisdiction of the Commission. The requirements for complaint cases filed under 39 U.S.C § 3662 allow only the Commission to issue orders to the Postal Service as a remedy.²⁴ These requirements

²² 39 C.F.R. § 3030.11.

²³ Complaint at 1.

²⁴ 39 U.S. Code § 3662(c) ("If the Postal Regulatory Commission finds the complaint to be justified, it shall order that **the Postal Service** take such action as the Commission considers appropriate in order to achieve compliance with the applicable requirements and to remedy the effects of any noncompliance." (emphasis added)).

contrast with other provisions outlining the Commission's authority, such as the authorization to issue subpoenas to Postal employees or other related parties.²⁵ The Commission's narrow delegation of authority applies only to the Postal Service, and does not extend to the three named individuals in this case.

IV. THE COMPLAINT SHOULD BE TREATED AS A SERVICE INQUIRY PURSUANT TO 39 C.F.R. PART 3031.

If the Commission does not dismiss the Complaint for the reasons set forth above and below, the Commission should refer the Complaint to the Postal Service for resolution through the rate and service inquiry process. The Commission established regulations applicable to issues raised by Postal Service customers that are limited in scope and are addressed most effectively through informal means with the Postal Service. Specifically, 39 C.F.R. § 3030.13(a) states:

(a) This section applies to complaints that concern rate or service matters that are isolated incidents affecting few mail users provided that the complaint does not either:

- (1) Raise unfair competition issues;
- (2) Raise issues affecting a significant number of mail users;
- (3) Represent a pattern, practice, or systemic issue that affects a significant number of mail users (or is reasonably likely to be evidence that such a pattern has begun); or
- (4) Impact a substantial region of the nation.

In this case, the allegations of the Complaint concern a single residential mail delivery point, the exact type of isolated incident affecting few mail users described in 39 C.F.R. § 3030.13(a). Moreover, the Complaint does not trigger any of the exceptions

²⁵ See 39 C.F.R. § 3005.14 which outlines service of subpoenas to various parties including employees of the Postal Service as well as others.

identified in 39 C.F.R. § 3030.13(a).²⁶ Specifically, Complainants make no claims of unfair competition under 39 U.S.C. § 404a. The Complaint is also limited in scope to delivery service provided to a single mail user at a single address. As such, the factual situation alleged in the Complaint is unlikely to affect a significant number of mailers and does not impact a substantial region of the country. Furthermore, the Complaint contains no allegations that the Postal Service's actions represent a pattern, practice or systemic issue that may impact a significant number of mailers.

Ultimately, if the Complaint is not dismissed, in order to resolve this issue outside of the formal Complaint process, the Commission should refer Complainants to the rate and service inquiry process, under which the Postal Service will, within 45 days, report to the Commission regarding whether the issues were resolved.

CONCLUSION

For the reasons set forth above, the Commission should dismiss the Complaint with prejudice.

²⁶ See 39 C.F.R. § 3030.13(a)(1)-(4).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 14, 2015

MANAGER CONSUMER AND INDUSTRY CONTACT
SANTA ANA DISTRICT



February 20, 2015

James D. Goodman
1600 Entre Colinas Place
Pomona CA 91768

FOIA Request 2015-FPPD-00257

Dear Mr. Goodman:

This responds to your Freedom of Information Act (FOIA) request dated January 10, 2015 for USPS documents, Office files, Carrier Route Files Investigations, Name (s) Addresses of Carriers, Supervisors or other Unauthorized Personnel in charge of delivery of mail to addressees at 1600 Entre Colinas Place, Pomona CA.

Based on your description of records sought, a search was conducted of the files maintained by the Pomona Post Office and 2 responsive documents were located. Enclosed you will find 2 documents, released to you in full.

Generally, the FOIA requires agencies to disclose reasonably described "records" within their possession unless the records fall within one or more of several exceptions. 5 U.S.C & 552 (a) (3) (b) (1)-(9). The information you requested, cannot be released pursuant to FOIA Exemption 6.

FOIA Exemption 6 permits agencies to withhold "personnel and medical files and similar files that disclosure of which would constitute a clearly unwarranted invasion of personal privacy". "Records that contain information concerning particular individual employees are "files" within the meaning of the exemption, and qualify for exemption 6 protection". Moreover, various information and documents covered by your request is protected from disclosure by the Privacy Act of 1974, 5 U.S.C. 442a.

If you deem this response to be a denial of your request, you may appeal by writing to the General Counsel, U.S. Postal Service, 475 L'Enfant Plaza, SW, Washington, DC 20260-1100, within 30 days of the date of this letter. The letter of appeal should include statements concerning this response, the reasons why it is believed to be erroneous, and the relief sought, along with copies of the original request letter, this letter, and any other related correspondence.

Thank you

A handwritten signature in black ink, appearing to read "Dora Therien".

Dora Therien
Manager Consumer and Industry Contact

3101 W SUNFLOWER AVENUE
SANTA ANA, CA 92799
714-662-6215-9325



CARRIER'S REPORT OF DOG PROBLEM

INSTRUCTIONS:

Please fill out this form whenever you have a dog interference or harassment on your route. When you have completed your portion of this form, complete a **DOG WARNING** card and place the date of the report on the back of it. Then, place a block on the delivery address at your case. When finished with these three steps, wrap this **DOG REPORT** around the customer's mail for that day and place it on the supervisor's desk for notification and signature. Thank You.

_____ 1st Report _____ 2nd Report 1/8/15 3rd Report

Date of Incident 1/8/15 Date Delivery was Stopped 1/8/15

Time of Incident 8:30 am/pm

FOR PACKAGES ONLY

Type of Incident Interference with mail delivery _____ Dog Attack _____ Dog Bite

Route Number 915

Address or Location of Incident or Problem: 1600 ENTRE COLINAS

Name of Dog Owner or Resident _____ Address: Spain

Description of Dog Breed Poodle Color White Size Large

Customer's present type of delivery

Curb _____ Door _____ Central _____ NDCBU _____ PO Box _____ Other

Description of what happened: THEY HAVE A LARGE Poodle THAT HAS BEEN BIT 4 TIMES

Neighbors Affected NO

Signature of Carrier Submitting Report: Dale McKeel

SUPERVISOR'S REPORT:

Police Called Yes/ No Response _____

Animal Control Called: Yes/ No Response _____

Recommendation from the Carrier _____

Administrative Action: () 1st letter () 2nd letter () Other Action _____

Signature of Supervisor: Dale McKeel Date Rec'd 1/8/15 Date Ltr Delivered 1/8/15

Postmaster
Pomona Post Office



January 8, 2015

Postal Customer at
1600 Entrecolinas
Pomona CA 91768

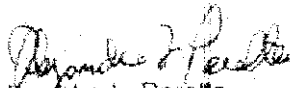
Dear Postal Customer

On Wednesday December 31, 2015 we were unable to deliver your mail because your dog was out and interfered with the letter carrier. For the safety of our employees, we have curtailed delivery to your address. You have been contacted and made aware of our policy and the State of California code regarding dog bites

We will continue to hold your mail for 10 days. You may come into the office and pick up your curtailed mail any time during office hours, Monday through Friday. If you have not contacted this office within that time, your mail will be returned to sender. To restore mail service, you will be required to meet with a delivery supervisor at this office. You will also need to bring a copy of the current Dog License and Rabies Vaccination Certificate for your dog and you will be asked to sign a commitment to restrain the animal. A copy of "State of California Civil Code on Dog Bites" has been attached for your information.

We regret that this action is necessary. If you wish to contact our office by phone, our number is 909-865-1267.

Sincerely,


Alejandro L. Peralta
Supervisor, Customer Services

Cc: Office file
Carrier route file

Pomona Post Office
580 W. Main Street
Pomona CA 91768-6988
TEL 909-865-1267
FAX 909-865-1951