

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Public Inquiry Concerning the
Terms of 39 U.S.C. 404(d)

Docket No. PI2016-2

MOTION OF ELAINE MITTLEMAN TO
SUPPLEMENT THE RECORD

(April 15, 2016)

Elaine Mittleman hereby moves to supplement the record in this Public Inquiry. Ms. Mittleman respectfully submits that comments submitted in this docket indicate that a more complete record would be useful. *See* Motion of GameFly, Inc. for Leave to File Supplemental Comments in Docket No. MC2015-7, refiled on January 29, 2015 at 4 (“The Commission would benefit from having a more complete and balanced record on these matters.”).

This request is based in part on some confusing and factually incorrect statements included in Reply Comments. There should be an opportunity after the Reply Comments were filed for commenters to address issues or facts in the Reply Comments.

It is unclear what, if any, deadline exists for the Commission to consider this docket. Thus, there likely is no prejudice to the Commission or commenters for this request to supplement the record.

The Notice seeking comments states at 2 that:

The Commission establishes Docket No. PI2016-2 to solicit comments regarding its interpretation of terms and concepts related to section 404(d) including the distinctions between closures or consolidations and relocations or rearrangements of postal retail facilities.

The Commission does not explain why it has authority to interpret terms and concepts, such as the distinctions between closures and relocations. Those terms are defined by regulations, 39 CFR § 241.3 and 39 CFR § 241.4. There is no reference to rearrangements in the regulation for relocations. The term, rearrangement, is not a valid term for discussion of post office closings and relocations.

The Notice states at 4 that:

[t]he Commission has determined that when the Postal Service redeploys retail facilities within a community, such a change constitutes a relocation or rearrangement of postal retail services within a community, as opposed to a closing or a consolidation. A relocation or rearrangement is not subject to section 404(d) and therefore not within the Commission's jurisdiction. ... Although the relocation of postal retail services is not defined by statute, the Postal Service defines and distinguishes it from facility discontinuances and consolidations. See 39 CFR 241.4.

The Notice states at 5 that:

The Commission also has determined that section 404(d) does

not apply to Postal Service actions that rearrange retail services within a community. ... The Commission has consistently applied its rationale used in *Oceana* and dismissed several post office closing appeals on the grounds that the Postal Service action constituted a rearrangement of retail facilities within a community.

The Commission does not explain the authority it relies upon to decide that section 404(d) does not apply to what the Commission describes as rearrangement of retail facilities within a community. The Commission does not have authority to create and define terms. Further, the Commission does not have authority to decide on its own that there is no jurisdiction for cases that the Commission decides are rearrangements based on the creation by the Commission of the category called rearrangements.

The Postal Service decides whether a procedure is a closing or a relocation and follows the procedure set out by regulation. There is no procedure or regulation for rearrangements, because that is not a proper category of actions by the Postal Service.

The Commission and some of the commenters ignore the procedures used by the Postal Service for closing (also called discontinuing) or relocating post offices. If the Postal Service determines that a post office is to be closed, the Postal Service follows the regulations for closings, 39 CFR § 241.3, to prepare the administrative record, review comments from the public and prepare a final determination. The Commission's responsibility on appeal is to review the record prepared by the

Postal Service. The Postal Service uses a different procedure, as described in 39 CFR § 241.4, for relocating post offices. These are two distinct procedures.

The Commission does not have the statutory authority to create a new and undefined category, which the Commission calls rearrangements. There is no valid category or action called rearrangements. Moreover, the Commission has used this non-existent category, called rearrangements, to restrict its jurisdiction. The Postal Service stated in its Reply Comments at 12 that “[i]t is therefore not up to the Commission to expand or contract its jurisdictional reach ...”

The confusion is furthered because the Commission has had a culture of undertaking its own analysis as to whether an action constitutes a rearrangement. The result is a line of cases, starting with *Oceana*, which the Commission treats as proper legal authority. However, those cases are not based on the regulations and definitions of closings and relocations. The cases utilize a concept, rearrangements within a community, created by the Commission. Thus, those cases are not proper legal authority.

There are substantive and fundamental questions presented by the Commission’s creation and use of the category it calls rearrangements. If the duty of the Commission is to review post office closings, why does the Commission invent its own category called rearrangements and use that category to dismiss appeals? What is the statutory authority for the Commission to decide it does not

have jurisdiction? In deciding it does not have jurisdiction to review rearrangements, the Commission relies upon its own orders, which are not grounded in the statutes and regulations concerning closings and relocations.

The analysis to be conducted by the Commission on appeal should be whether the Postal Service complied with 39 CFR § 241.3 in making a determination to close a post office. The Commission cannot on its own initiative decide that it does not have jurisdiction to review a determination by the Postal Service to close a postal facility. The review by the Commission is required by 39 U.S.C. § 404(d)(5).

A “rearrangement” analysis conducted pursuant to the Commission’s vision of that term may possibly include a map of the affected community, a description of all post offices within that community, and an overall plan to optimize service in the community. Further, a rearrangement analysis could possibly include a discussion as to how the proposed closing is similar to what happened at Oceana in 1982. That type of analysis may appear helpful based on the Commission’s concept of rearrangements, but such a comparative analysis is not pertinent to or included in the findings of the Postal Service in a final determination to close a post office.

The Postal Service does not conduct a comparative analysis when it prepares the administrative record and a final determination to close a post office. A final

determination concerns one post office and not a group of facilities that are somehow considered to be in the same community. The Postal Service does not discuss what happened at Oceana and whether the planned closure resembles the actions at Oceana.

Further, the Commission does not offer a method or regulation as to what is considered the community for its analysis of rearrangements of postal facilities within a community. The final determination prepared by the Postal Service includes a discussion about the community.

This focus on rearrangements has caused the Commission to invent its own analysis and perhaps its own facts. The procedure mandated by 39 U.S.C. § 404(d)(5) requires that the Commission rely on the administrative record. However, in some cases, the Commission cites its own speculation or assumptions and does not cite the administrative record or final determination of the Postal Service.

In the Pimmit case, the final determination was to close the Pimmit post office. However, the Commission decided that this action was a rearrangement. The Commission did not explain why it did not rely upon the administrative record and final determination that were based on the decision of the Postal Service to close the Pimmit post office. As discussed above, there is no category or procedure conducted by the Postal Service for “rearrangements.” If the Postal

Service determined that it was closing the Pimmit post office, why did the Commission contradict that determination and instead find that the action was a rearrangement? Did the Commission simply ignore the facts and findings of the Postal Service in the final determination to close the Pimmit post office?

The creation of the category called rearrangements has led the Commission to conduct its own discussion about whether an action was a rearrangement. The Commission does not rely on the record or accept the decision by the Postal Service whether an action is a closing or a relocation. Thus, the Commission uses its own reasoning and facts, rather than citing references to the final determination of the Postal Service.

The Order dated January 20, 2012, that dismissed the Pimmit appeal included substantial discussion of *Oceana* and related cases. The Order stated at 10 that “[i]n *Oceana Station*, the Postal Service sought to close the station as part of a plan to rearrange retail and carrier facilities in an area of Virginia Beach.” The Order stated at 11 that “[i]n this case, as in the *Oceana Station* and *Ecorse Branch* proceedings, the closure of the postal facility is part of a broader plan to rearrange the postal network.” The Commission stated its conclusion at 12 that “[t]he closing of the Pimmit Branch was part of a rearrangement of retail facilities in the Falls Church, Virginia area.” These statements by the Commission’s Order are not

supported by references to the final determination of the Postal Service to close the Pimmit post office.

This discussion in the Pimmit Order about *Oceana* constitutes speculation or generalized assumptions by the Commission as to what may be the similarities between the Pimmit post office and what happened in Virginia Beach in 1982. The final determination for the Pimmit post office does not discuss *Oceana* and related cases. Further, the final determination does not indicate that the closing of the Pimmit post office is “part of a broader plan to rearrange the postal network.”

Thus, the Commission violates 39 U.S.C. § 404(d)(5), which requires the Commission to review the Postal Service’s determination to close a post office on the basis of the record that was before the Postal Service. This requirement is noted in the Pimmit Order at 8-9. Even though the Commission admits that it is required to review the Postal Service’s determination based on the record that was before the Postal Service, the Commission does not base its analysis on the final determination. Instead, the Commission undertakes its own analysis and supposition based on what it considers to be similarities with other post office situations in other cities and in other years.

The Pimmit Order stated at 12 that “[in] this proceeding, the Postal Service entered into a long-term lease for the facilities at 800 West Broad Street with the expectation of closing the Pimmit Branch.” There is no citation to the record or

the final determination to support that statement. There is no date given for when the long-term lease for the facilities at 800 West Broad Street was signed.

The Pimmit Order stated at 12 that the existence of the plan is supported by the Administrative Record. One example given was Item No. 9 (Questionnaire Transmittal Letter). The letter dated January 7, 2010 (attached here) stated that “Consolidation of the Pimmit Branch, located at 7520 Leesburg Pike, Falls Church, VA is currently under consideration.” The letter does not refer to or discuss a plan to rearrange the postal network in Falls Church.

A letter to Rep. Frank R. Wolf dated February 23, 2010 (attached here) included as part of Item No. 9, stated that “[a]s indicated in the January 7 letter from Senior Post Office Operations Manager, Robert Gingell, ... the Northern Virginia District of the Postal Service is conducting a study of postal operations at the Pimmit Branch. The study is ongoing and no decisions have been made.” Again, there was no mention of a plan to rearrange the postal network in Falls Church.

Further, there was no discussion about the lease for the facilities at 800 West Broad Street having been signed with the expectation of closing the Pimmit Branch. To the contrary, the letter stated that “no decisions have been made.” The postal retail facilities in the city of Falls Church were moved from 301 West Broad

Street to 800 West Broad Street on June 20, 2009, which was months before the letter to Rep. Wolf said that no decisions had been made.

In the final determination to close the Pimmit post office, the pertinent community was the Pimmit area, which is located in Fairfax County. The community was not the Falls Church area. The final determination stated that one of the disadvantages was “[t]he loss of a retail outlet in the community.” However, the Commission assumed that the community was the Falls Church area. This is another example of the Commission ignoring the discussion in the final determination to close the Pimmit post office.

The idealized and imagined concept of a “rearrangement” was reiterated in the Reply Comments of the Public Representative filed on March 29, 2016, in this docket. The Reply Comments state at 12 that “[t]he Commission interpreted 404(d) closings and consolidations to exclude rearrangements, which occur inside the affected community and are designed to improve the community’s access to postal retail services.” Footnote 31 states that the Pimmit action was a “planned rearrangement to enhance the Postal Service’s network by opening a new main post office inside the community.”

The Reply Comments show the misguided perception of the action taken concerning the Pimmit post office. There was no “planned rearrangement.” There is nothing to indicate that the Postal Service’s network was enhanced. A new main

post office was not opened. In fact, there is no main post office. The retail facilities at 301 West Broad were moved to the Finance Station at 800 West Broad. The facility at 800 West Broad is in the city of Falls Church. The Pimmit post office was in Fairfax County. The Pimmit post office was not in the same community as the Finance Station at 800 West Broad.

This description of what purportedly happened concerning the Pimmit post office is simply a continuation of the Commission's concept of rearrangements that was created in the *Oceana* opinion. Whatever happened at *Oceana* is not instructive when reviewing the final determination to close the Pimmit post office. The discussion in the Reply Comments about enhancing the network by opening a new main post office is not based on the facts and the final determination to close the Pimmit post office.

The Reply Comments state at 13 that "rearrangements create a new Postal Service-operated retail facility in the community, transfer retail services to a superior Postal Service-operated retail facility, or both." The reference in the Reply Comments to transfer to a superior retail facility includes footnote 35, which states that "[t]he services of Pimmit Branch, East Elko Station, Birmingham Green Station, and Oceana Station were each rearranged to a main post office."

This discussion in the Reply Comments about the Pimmit post office is incorrect in several ways. The Pimmit post office was not "rearranged to a main

post office.” As discussed above, there is no such category as a rearrangement and retail services were not “transferred.” After the Pimmit post office closed, postal customers simply had to find another post office, which could be in Vienna, McLean, Merrifield, Falls Church or elsewhere. Further, there is no main post office.

It is particularly troubling that there is a reference in the Reply Comments to “a superior Postal Service-operated retail facility.” The Finance Station at 800 West Broad Street is not “a superior Postal Service-operated retail facility.” This bald assumption that a different facility is superior reflects the discussion in footnote 37 of the Reply Comments about the *Oceana* and *Birmingham Green* cases. Whatever happened in those cases provides no information or support for a claim that there was a transfer to a superior retail facility in the Pimmit case.

The fundamental event for the Pimmit community is that the Pimmit post office was closed and there is no post office in the Pimmit community. The Reply Comments of the Public Representative show a lack of understanding that the Pimmit community no longer has a post office.

The Reply Comments state at 14-15 that “[n]either relocation method recognized by the Commission diminishes the total number of Postal Service-operated retail facilities inside a community.” However, the Commission decided

that there was a rearrangement of the Pimmit post office. The Commission completely ignored the fact that the Pimmit community lost a retail facility.

The Pimmit Order explained at 6 that:

On November 20, 2009, the Post Office Review Coordinator prepared a Post Office Closing or Consolidation Proposal Fact Sheet (PS Form 4920) as part of the Pimmit Branch discontinuance study. *Id.*; Item No. 8. He gave the following reason for closing the Pimmit Branch: “Part of DAR Justification for Falls Church Main Office project.” *Id.* at 1. (Response to Item No. 7).

The Commission explained in the Order at n. 27 that “DAR” stands for “Decision Analysis Report,” which is “a document prepared by the requiring authorization to recommend an investment for approval, and it is used for decisions regarding high dollar-value projects.” However, even though the reason given for closing the Pimmit Branch was “Part of DAR Justification for Falls Church Main Office project,” the DAR is not included in the Administrative Record. Thus, the Commission referred to a document, the DAR, which was not part of the Administrative Record. The mere reference to the DAR does not explain its contents or provide record support for the reason to close the Pimmit Branch.

It is respectfully requested that the record be supplemented with the following information or documents:

1. Statutory provision or regulation establishing or describing the category of “rearrangements”

2. Statutory provision or regulation that grants or establishes authority for the Commission to decide its own jurisdiction

3. Statutory provision or regulation that provides that the Commission does not have jurisdiction to review rearrangements

4. DAR Justification for Falls Church Main Office project

This requested information would provide a more complete record for the Commission in considering the issues presented in this docket.

Respectfully submitted,

/s/ Elaine Mittleman
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FINAL DETERMINATION TO CLOSE

THE

PIMMIT BRANCH, VA OFFICE

AND CONTINUE TO PROVIDE

CITY DELIVERY SERVICE

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service has determined to close the Pimmit Branch in Falls Church, VA and continue to provide city delivery service. Post Office Box and retail services will be provided at the Falls Church Finance Unit, VA 22040, located 2 miles away.

Service will be provided to roadside mailboxes installed by customers on the carrier's line of travel.

A classified branch is operated by career postal employees and provides the same services as an independent post office, including postage meter setting and acceptance of permit mail.

The Walk In Revenue and customer transactions have declined at the Pimmit Branch. There are only 303 Post Office Boxes rented. The surrounding Station and Branches, Stamps on Consignment locations and city delivery routes should provide the customers of the Pimmit area sufficient alternatives for their delivery and retail needs.

The Pimmit Branch, an EAS-22 level, provides service 37.5 hours a week from 8:30 am to 2:00 p.m. and 3:00 to 5:00 p.m., Monday through Friday, and closed on Saturdays to 303 post office box customers. Retail services include the sale of stamps, stamped paper, and money orders; special services such as registered, certified, insured, COD, and Express Mail; and the acceptance and dispatch of all classes of mail. Daily retail window transactions average 441. Office receipts for the last three years were: \$687,149 in FY 2009; \$844,764 in FY 2008; and \$821,543 in FY 2007. There are no permit mail customers.

When this final determination is implemented, Post Office Box and retail services will be provided by the Falls Church Finance Unit, an EAS-22 level office located 2 miles away. Window service hours at the Falls Church Finance Unit are from 9:00 a.m. to 5:00 p.m., Monday through Friday, and 9:00 a.m. to 12:30 p.m. on Saturday. There are 608 Post Office Boxes available.

On January 7, 2010, 303 questionnaires were distributed to the Post Office Box customers of the Pimmit Branch. Questionnaires were also available over the counter for retail customers at the Pimmit Branch. 125 questionnaires were returned. 10 responses were favorable, 56 unfavorable, and 59 expressed no opinion regarding the proposed alternate service.

The following postal concerns were expressed on the returned questionnaires, from customer letters, on the petition, and from the congressional inquiries:

1. **Concern:** Customers were concerned about senior citizens.

Response: Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery services. Customers do not have to make a special trip to the post office for service. Special provisions are made for hardship cases or special customer needs. Elderly customers should expect the same level of assistance and helpful service from the surrounding post offices.

2. **Concern:** Customers were concerned about the traffic and additional travel time to go to another post office.

Response: The Postal Service has developed a number of convenient options that can save customers a trip to the Post Office. For instance, customers can buy stamps online on our Web site at www.usps.com, by phone at 1-800-STAMPS24, or by mail. Stamp orders are delivered directly to customer mailing addresses. Our Click-N-Ship online mailing service will calculate and print mailing labels with postage. It also offers free Delivery Confirmation or Signature Confirmation as an option. Free carrier pickup may be requested

online and is available with Express Mail Overnight Guaranteed, Priority Mail and International Mail. Customers can also place their mail on hold, file a change-of-address order, or request redelivery of an item of which a notice was left by calling 1-800-ASK-USPS or visiting www.usps.com.

3. **Concern:** Customers were concerned that the parking at the Fall Church Post Office was insufficient and dangerous.

Response: The planning for the new Falls Church Post Office took into consideration additional parking. Available parking spaces should not be an issue. The Ingress and Egress to the parking area is in compliance with all local ordinances and codes. During rush hour, it may be difficult to make left hand turns on to Broad Street. It is recommended to make right hand turns during the high traffic time period.

4. **Concern:** Customers were concerned that the clerks at the Falls Church Post Office were rude and inefficient.

Response: Employee courtesy is always a concern of postal managers. Postal employees receive periodic instructions regarding employee courtesy. We do not condone our employees' execution of their duties in an unprofessional or discourteous manner. The postmaster of Falls Church has been notified of your concern.

5. **Concern:** Customers were concerned that they would not receive the exceptional service that they received at the Pimmit Branch.

Response: Courteous and helpful service will be provided by personnel at the Falls Church Main Post Office and other post offices in the area.

6. **Concern:** Customers were concerned because the lines were long at the Falls Church Post Office.

Response: The Postal Service™ shares the problem of occasional long lines with banks, supermarkets, and other retail outlets. Lines occur most often on Mondays, day after holidays, during lunch hours, and near closing times. We make a concerted effort to match our staffing schedules with the known peaks of customer traffic. To minimize wait time, we rely upon our Postmasters to take steps to remedy the situation and ensure that customers do not have to wait in line an unreasonable or excessive amount of time. The postmaster of Falls Church was notified of this concern.

7. **Concern:** Customers were concerned about the dissemination method of the questionnaires and time frames allowed for community feedback.

Response: Each Post Office Box customer received a questionnaire and questionnaires were available for walk in customers at the retail unit from January 7, 2010 to January 21, 2010. It should be noted that all comments received up to June 7, 2010 have been taken into consideration.

8. **Concern:** Customers were concerned about the Change of Address Policy.

Response: Mail will be forwarded in accordance with postal regulations, and change of address forms are available from the Postal Service to assist customers in notifying correspondence of the change. First Class mail is currently forwarded for a period of 12 months.

9. **Concern:** Customers were concerned about where they could deposit outgoing mail if the Pimmit Branch were to close.

Response: The Postal Service intends to have a collection box in this area for the deposit of mail.

10. **Concern:** Customers were concerned about the cost of printing new stationary and envelopes and the need for advance notification of the effective date.

Response: Customers would not be expected to incur the cost of reprinting their business stationary and envelopes immediately. They should be able to exhaust their current supply and just notify their customers of their new address in their every day correspondence with them. If a decision is made to actually close the Pimmit Branch, we will give as much of an advance notice as possible in order to minimize the impact to our customers.

11. **Concern:** A customer was concerned about lost and damaged mail at the Falls Church Main Post Office.

Response: Reports of mail loss is a great concern. Regrettably, when such instances are brought to our attention, there is no sure way of determining what may have happened. With the large volume of mail moving through our network each day, it is literally impossible to trace a single piece of regular First-Class Mail. Only Registered Mail, which is accounted for during its entire journey, can be accurately traced. The Postal Service appreciates the reporting these instances to us so we can work toward improvements.

12. **Concern:** Customers wanted Post Office Box service but did not want to go to the Falls Church Post Office.

Response: For customers that require Post Office Box Service, there are other options available other than the Falls Church Post Office. The Dunn Loring Branch of Vienna Virginia is located only 2.2 miles way for their convenience.

13. **Concern:** Customers were concerned about the reduction of hours at Pimmit Branch.

Response: A reduction of the hours the retail windows were open had been previously implemented at the Pimmit Branch. This was due to the fact that the hours of operation were not being supported by customer traffic or revenue transactions

Some advantages of alternative delivery and retail service proposal are:

1. Carrier delivery service is beneficial to some senior citizens, the handicapped, and working people since customers will no longer need to travel to the Post Office to pick up their mail.
2. Stamps by Mail order forms are provided for customer convenience and three Stamp on Consignment locations.
3. Customers opting for carrier service will have 24-hour access to their mail.
4. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
5. Customers opting for carrier service will no longer have to pay Post Office box fees.

Some disadvantages of alternative delivery and retail service proposal are:

1. The loss of a retail outlet in the community.
2. A change in mailing address.

Taking all available information into consideration, the Postal Service concludes this proposal should provide the customers of the Pimmit Area sufficient alternatives for their delivery and retail needs.

II. EFFECT ON COMMUNITY

The Pimmit Area is an unincorporated community located in Fairfax County. The community is administered politically by the Fairfax County Government. Police protection is provided by Fairfax County, and fire protection is provided by Fairfax County. The community is comprised of retired people, those who commute to work at nearby cities and work in local businesses.

There are numerous religious institutions and businesses in the community. Residents conduct business in the Pimmit Area and travel to nearby communities for other supplies and services.

Nonpostal services provided at the Pimmit Branch will be available at the Falls Church Finance Unit. Government forms normally provided by the post office will also be available at the Falls Church Finance Unit or by contacting their local government agency.

The following nonpostal concerns were expressed on the returned questionnaires and on the congressional inquiry:

1. **Concern:** A customer felt the Pimmit Branch should not be discontinued since she was a tax payer.

Response: The United States Postal Service has not been funded by tax dollars since the early 1970's. We must meet our expenses by the revenues we generate. Operational savings for the Postal Service, contributes in the long run to stable postage rates and savings for our customer.

2. **Concern:** Customers expressed concern that that the discontinuance of the Pimmit Branch would impose a hardship on them because they operate businesses in the area and have an ecommerce business. They stated that it may force them to utilize our competitors more.

Response: If a decision is made to close the Pimmit Branch, we will have a representative from our Sales Group contact the customer to explore ways to retain their business.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this proposal will not adversely affect the community.

III. EFFECT ON EMPLOYEES

There are two Full Time employees at the Pimmit Branch which includes a Level 7 Clerk Finance Station and a Level 6 Sales and Service Distribution Associate. These employees will be excessed in accordance to the Article 12 provisions of the National Agreement between the American Postal Workers Union and the United States Postal Service. No other postal employee will be adversely affected.

IV. ECONOMIC SAVINGS

The Postal Service estimates an annual savings of \$117,743 with a breakdown as follows:

Employee Salaries	\$27,231
Inter-station Transportation	6,720
Rental Costs	78,676
Utilities	3,184
Maintenance	+1,932
Total Annual Costs	<u>\$117,743</u>
Less Annual Cost of Replacement Service	-0
 Total Annual Savings	 \$117,743

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

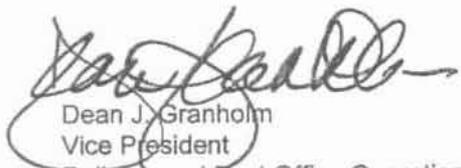
The Postal Service is proposing to close the Pimmit Branch in Falls Church, VA and provide Post Office Box and retail services at the Falls Church Finance Unit, located 2 miles away. In addition, The Dunn Loring Branch in Vienna, VA is located only 2.2 miles away. Three Stamps on Consignment locations are located within 1.2 miles of Pimmit. They are Chevy Chase, 7501 Leesburg Pike, Whole Foods Market, 7511 Leesburg Pike and Chevy Chase located at 7040 Haycock RD, Falls Church, VA. The Pimmit Branch is surrounded by city delivery routes. Customers may also choose to erect mail boxes and to receive delivery along the city carrier's line of travel.

The Pimmit Branch, an EAS-22 level, provides service 37.5 hours a week from 8:30 a.m. to 2:00 p.m. and 3:00 to 5:00 PM, Monday through Friday, and closed on Saturdays to 303 post office box customers. Daily retail window transactions average 441. There are no permit mail customers.

Taking all available information into consideration, the Postal Service has determined that the advantages outweigh the disadvantages and this final determination is warranted.

VII. NOTICES

Notify customers of the permanent discontinuance of the Pimmit Branch in Falls Church, VA and advise them of the hours of operation and services available at the Falls Church Finance Unit, VA 22040 and other alternative CPUs, stations/branches and post offices. Explain specific information on address changes and why the change is necessary.


 Dean J. Granholm
 Vice President
 Delivery and Post Office Operations

06/20/11
 Date



January 7, 2010

Dear Postal Customer:

Current economic conditions require that we review all postal operations for opportunities to streamline processes and provide service more efficiently. Changes in consumer preference and recession-related declines in mail volume have reduced U.S. Postal Service revenues. Operation of the Postal Service is paid for by postage and fees paid by our customers with no operational subsidy from taxes.

Consolidation of the Pimmit Branch, located at 7520 Leesburg Pike, Falls Church, VA is currently under consideration. If you are currently receiving letter carrier delivery, there will be no change to your delivery service, however mail pickup for notification of parcels and signature items would move to the Falls Church Main Office, located at 800 W Broad St, Falls Church, VA.

As the postal manager responsible for all offices in your area, I would like your opinion concerning a possible change in the way your postal service is provided. A review of the business activities of the Pimmit Branch revealed that the office workload has declined. This reduced workload and the fact that we have the Falls Church Main Office located approximately 1.7 miles away suggests that the continuation of the Pimmit classified branch may not be warranted.

If you are a post office box customer, you have the option of post office box delivery at the Falls Church Main Office, or you may receive carrier delivery at your residence. You will be required to change your mailing address if you choose to rent a Post Office Box at the new location. Full retail service hours at the Falls Church Main Office are from 9:00 a.m. to 5:00 p.m., Monday through Friday and 9:00 a.m. to 12:30 p.m. on Saturday. The post office box lobby is open 24 hours for customer convenience. Other offices available to offer post office box service includes the Dunn Loring Branch of Vienna, VA located 2.2 miles and the Merrifield Retail Unit located at 8409 Lee Highway, Merrifield.

The Postal Service operates to serve our customers. We value your opinions during this review process. Please complete the enclosed questionnaire and return with your comments by January 19, 2010, using the pre-addressed envelope provided.

If you have any questions, you may call Donna Bradley, Postmaster, Falls Church, VA, at 703-532-8504.

Thank you for your assistance.

Sincerely,

Roberts S. Gingell
Sr. Manager, Post Office Operations
8409 Lee Highway
Merrifield, VA 22081-9998

Enclosures



February 23, 2010

The Honorable Frank R. Wolf
Member of Congress
13873 Center Road, Suite 130
Herndon, VA 20171

Attention: Judy McCary

Dear Congressman Wolf:

This is in response to your February 4 letter on behalf of [REDACTED] of Falls Church, regarding the Pimmit Branch of the Falls Church Post Office.

Thank you for sharing [REDACTED] comments. I recognize your interest in ensuring that she continues to have convenient access to essential postal services. As you are aware, the U.S. Postal Service is a self-supporting agency that funds its operations from the revenue generated by the sales of our products and services – not taxpayer subsidies received through the Congressional appropriations process. Like so many businesses today, the Postal Service is experiencing significant financial challenges related to declining mail volumes and revenue. Despite cost-cutting efforts resulting in \$6 billion in cost savings and a \$4 billion reduction in required payments for retiree health benefits, the Postal Service ended fiscal year 2009 with a net loss of \$3.8 billion and a mail volume decline of more than 25 billion pieces. Forecasts for 2010 appear equally as dim.

In the face of such difficulties, the Postal Service is pursuing solutions and strategies to mitigate the impact. Efforts have focused on improving efficiencies and making sure the processing and delivery networks are as streamlined as possible through such activities as mail processing consolidations and carrier route adjustments. The Postal Service is also reviewing station and branch operations of larger Postal Facilities throughout the nation. The focus is on areas where we have a number of offices in close proximity to determine where consolidations are possible.

As indicated in the January 7 letter from Senior Post Office Operations Manager, Robert Gingell, a copy of which was enclosed in Ms. Smith's correspondence, the Northern Virginia District of the Postal Service is conducting a study of postal operations at the Pimmit Branch. The study is ongoing and no decisions have been made. You can be assured that postal officials are devoting careful attention and effort to this study and customers will be notified in advance of any changes that may affect service in their area.

If I can be of assistance in other postal matters, please let me know.

Sincerely,

Michael S. Furey

cc: Dennis Voorhees, Manager, Post Office Operations
Bob Gingell, Senior Manager, Post Office Operations