Congress of the United States
Washington, DC 20515

February 13, 2012

Patrick R. Donahoe, Postmaster General
United States Postal Service
475 L'Enfant Plaza, SW
Washington, DC 20260-0010

Dear Mr. Donahoe:

We understand that the United States Postal Service (USPS) is facing acute financial difficulties, and as a result, has made the decision to begin the process of closing thousands of postal facilities. We share your concern about the solvency of the USPS and its future as our nation's postal service.

Recently however, the Postal Regulatory Commission (PRC) reviewed the Postal Service's Retail Access Optimization Initiative (RAOI), which is being used as the basis for the possible closure of more than 3,600 post offices and other retail facilities, and found serious flaws with the analysis that call into question the USPS's current consolidations plans. We share the concerns of the PRC, and ask for you to place a moratorium on the USPS's current discontinuance studies until the USPS resolves the numerous problems the PRC identified in the RAIO. These include:

- Incomplete data for all Post Offices, branches and stations. Currently, the USPS does not have inclusive data for every individual office, branch or station, which makes it impossible to accurately calculate cost savings from proposed closures.

- Inaccurate representations of usage and revenues for all Post Offices, branches and stations. For example, revenue measurements do not include transactions such as post office box visits, exceptional dispatch for local periodicals, or alternate revenue transactions such as business mail or returns.

- Estimates of the distance between postal facilities that are undergoing a discontinuance study and others nearby that would be required to absorb the consumer base use geographical distance rather than actual driving distance. While the discontinuance study may address this issue, the RAOI needs to provide this information at a preliminary stage so accurate assessments can be used to inform which Post Offices, branches or station are eligible for a discontinuance study.

- The low workload and revenue screen included in the RAOI disproportionately targets rural post offices for discontinuance studies. Targeting rural post offices for discontinuance studies clearly violates 39 U.S.C. 101(b), which maintains that the USPS is required to provide effective and regular postal service to rural communities.

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We strongly urge you to rectify these issues within the RAOI before proceeding with any discontinuance studies or closures. The closure of Post Offices, stations, and branches will undoubtedly affect communities and lead to the loss of middle class jobs. We remain dedicated to protecting our nation's postal service and ensuring that all communities are adequately served by the USPS.

Sincerely.

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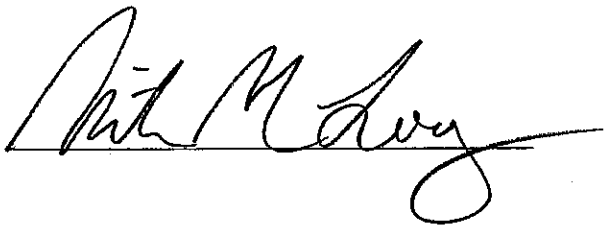

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