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27TH DISTRICT, NEW YORK

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March 1, 2012

The Honorable David C. Williams  
Inspector General  
United States Postal Service  
1735 North Lynn Street  
Arlington, Virginia 22209-2020

Dear Mr. Williams:

I am writing to ask for an independent review of the Area Mail Processing (AMP) study conducted in reference to the Buffalo Processing and Distribution Center (Buffalo P&DC). The United States Postal Service (USPS) has in my opinion knowingly and deliberately hidden from the public important information throughout the evaluation process and has reached a conclusion to consolidate the Buffalo P&DC at Williams Street that has failed to seriously address and answer the questions, concerns and issues raised by the residents, businesses and the workforce throughout the public process.

For your review, I have attached my submission during the public comment period that starkly illustrates the shortcomings of the USPS to follow its own guidelines in notification to the public, execution of an economic evaluation, and a lack of transparency. The FOIA requests I submitted have not been responded to with any detail by the USPS. I have heard directly from many customers, including the hundreds that attended a public meeting called with little notice in January, as to the impact this closing will have on them. I have heard directly from a publisher of a weekly business publication, printers alliance, local non-profits, the Erie County Association of Town Clerks and the Buffalo-Niagara Partnership as to the negative economic impact the closing of the Buffalo P&DC will have on their bottom line and the prospective private sector job loss or relocation because of this decision.

Yet none - not one of these comments, concerns and issues - were taken into account with the recent USPS announcement approving the consolidation study. In fact, the USPS website includes a FAQ page titled, "Our Future Network" that answers the question "were public comments reviewed and considered?" with the response "Yes. All comments were reviewed." Reviewed, but clearly not considered. This is a direct violation of the Postal Service Accountability and Enhancement Act, which became effective December 20, 2006. Specifically,

the Postal Service must "afford affected persons ample opportunity to provide input on the proposed decision and take such comments into account in making a final decision."

I also contend this AMP study is in violation of the Communication Plan Overview outlined in Handbook PO-408 - Area Mail Processing Guideline which states "the objective of the AMP Communications Plan is to communicate effectively to the public and postal service employees the fact that consolidation of operations improves efficiency and/or service. The AMP worksheet, stakeholder's notification, identifies those local stakeholders who require timely and appropriate communications, including the following: employees, employee organizations, appropriate individuals at various levels of government, local media, community organizations, and local mailers."

In the redacted AMP study I received, the stakeholder notification page is blank.

I ask that you take immediate action to review the way in which the USPS has conducted this historically large set of AMP studies nationwide. It is difficult to fathom how an agency that previously performed only tens of AMP studies a year would somehow be capable of implementing a policy that required hundreds in a diverse set of communities across the United States. I have found the process lacking in almost every aspect. I respectfully request that you conduct an independent review of the Buffalo AMP study to determine whether this process has been flawed in its conception and execution. I believe strongly that the people of my community have been disenfranchised from participating in this process that has been from the beginning one of "decide first and justify later."

Sincerely,



BRIAN HIGGINS  
Member of Congress