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BORDER AND MARITIME SECURITY
SUBCOMMITTEE ON COUNTERTERRORISM
AND INTELLIGENCE

Congress of the United States
House of Representatives
Washington, DC 20515-3227

SUBCOMMITTEE ON THE
MIDDLE EAST AND SOUTH ASIA
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REVITALIZING OLDER CITIES
TASK FORCE

Co-CHAIR

September 15, 2011

Patrick R. Donahoe
Postmaster General
475 L'Enfant Plaza SW
Washington DC 20260-3500

John Phelan
Buffalo Postmaster
1200 William Street, Rm 205
Buffalo, NY 14240-9345

Dear Sirs:

On July 26, 2011 the United States Postal Service (USPS) announced publicly it will conduct studies of approximately 3,700 retail offices to “determine customer needs.” In meetings with local USPS representatives our office was assured the process would be open and fully inclusive of community input. I write today to specifically object to the lack of appropriate community notification on the proposal to close the United States Post Office in Lackawanna, NY.

Please find below our specific objections:

Community Survey:

- **Lackawanna residents & businesses have not received the questionnaire:** According to the Proposal to Close the Lackawanna Branch (*Docket: 1422790-14228, Item Nbr: 17, Page Nbr: 2*) “*On or about September 4, 2011, questionnaires were distributed to delivery customers of the Lackawanna Branch.*” However, a significant number of residents living in the City of Lackawanna have reported to our office that they have not received the customer questionnaire (*Docket: 1433790-14228, Item Nbr: 10*). In fact, we have yet to hear from one individual living or owning a business in the 14218 zip code who has knowingly received the survey.

- **Questionnaire fails to adequately disclose the intent to close the Lackawanna Branch:** A copy of the Postal Service Customer Questionnaire (*Docket: 1433790-14228, Item Nbr: 10*) provided to our office reads as follows: “*Your responses to the following questions are important to the US Postal Service and will be considered in the feasibility study for the Lackawanna Branch.*” In no portion of the survey is it clearly defined that the Lackawanna facility is slated for closure and responses will factor into a final decision on that matter.

- **Questionnaire fails to mention details of the Community Meeting:** No portion of the customer questionnaire (*Docket: 1433790-14228, Item Nbr: 10*), purportedly mailed to 14218 customers, mentions the intent to hold a community meeting or the details of such meeting.

Public Notice:

- **Proposal and Request for Comments Not Clearly Visible to the Public:** The Invitation for Comments (*Docket: 1433790-14218, Item Nbr: 16*) and Proposal to close the Lackawanna branch (*Docket: 1422790-14228, Item Nbr: 17*) is posted in the facility foyer, significantly above eye level, on forms with extremely fine print (text which appears to be approximately 8 pt. font). Visitors to the Post Office would have to look extremely hard to find the posting and reading it is even more difficult given the text size.
- **Community Meeting Not Publicized Through Local Media:** With today being less than one week prior to the scheduled community meeting, the USPS has failed to publicize the meeting through print, radio, TV or alternative news sources from which the public is routinely notified of community events and news.
- **Community Meeting Details Incomplete:** In the Proposal (*Docket: 1422790-14228, Item Nbr: 17, Page Nbr: 2*) the notification of the community meeting reads as follows: “*On September 20, 2011, representatives from the Postal Service will be available at Lackawanna Senior Citizens Building: 340 Martin Rd to answer questions and provide information to customers.*” The information fails to include a meeting time or any additional information about the meeting agenda and process for community input.

Community Feedback:

- **Conflicting Deadlines for Community Feedback:** The Customer Questionnaire (*Docket: 1433790-14228, Item Nbr: 10*) asks respondents to complete the survey and return it no later than 09/21/2011 however, the Invitation for Comments (*Docket: 1433790-14218, Item Nbr: 16*) reports comments will be accepted through 11/07/2011. This is problematic not only because it leads to confusion about the authentic deadline, but as I have indicated in points above, residents have yet to receive the surveys containing the deadline listed as one week from today and the Invitation for Comments posted within the Lackawanna facility is not clearly visible.

As per my letter dated August 9, 2011, I remain opposed to the proposal to close the only USPS facility in the City of Lackawanna based on the unique demographics and needs of the surrounding community. But regardless of my position on behalf of the community I serve, the USPS owes it to the citizens and customers they serve to clearly and appropriately inform the public of a potential closing and give weight to the customers voice to as you conduct your studies to “determine customer needs.”

Given the inadequacy that has been documented in the above areas, it is the responsibility of the Postal Service to address these issues before any public hearing can be held. The legitimacy of the process depends on strong and thorough input from the community and documentation that significant outreach was deployed. With that, I am requesting you delay the proposed community meeting, scheduled for September 20, 2011 in Lackawanna, until such time Lackawanna residents are fully aware of the meeting and prepared to attend. In addition we ask you to extend the November 7, 2011 deadline for public comments given the points made above.

Thank you for your consideration and please feel free to contact my Erie County District Office at 716-852-3501 if you would like to discuss these matters further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian Higgins", is written over the printed name.

BRIAN HIGGINS

Member of Congress

Attachments:

Postal Service Customer Questionnaire (Docket: 1433790-14218, Item Nbr: 10)

Invitation for Comments: (Docket: 1433790-14218, Item Nbr: 16)

Proposal to Close: (Docket: 1433790-14218, Item Nbr: 17)



Postal Service Customer Questionnaire

Your responses to the following questions are important to the US Postal Service and will be considered in the feasibility study for the Lackawanna Branch. Please take a few minutes to complete this survey and return it no later than 09/21/2011 in the postage-paid envelope provided.

The study consists of a publicly available record, so please be advised that any information that you furnish will be visible to others.

1. Do you visit the Lackawanna Branch for personal reasons, business-related reasons, or both?
- Personal reasons Business-related reasons Both
2. Please check the appropriate box to indicate whether you use the Lackawanna Branch for each of the following:

Postal Services	Daily	Weekly	Monthly	Never
a. Buying Stamps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Mailing Letters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Mailing Parcels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Pick up Post Office box mail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Pick up general delivery mail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Buying money orders	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Obtaining special services, including Certified Mail, Registered Mail, Insured Mail, Delivery Confirmation, or Signature Confirmation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Sending Express Mail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Sending Priority Mail	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Carrier pickup	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Buying stamp-collecting material	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Entering permit or bulk mailings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m. Obtaining other federal agency forms (e.g., Selective Service, Duck Stamps, Passport Applications)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n. School bus stop	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o. Assisting senior citizens, persons with disabilities, etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
p. Public bulletin board	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
q. Community gathering place	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
r. Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. Do you ever use any of the following alternative methods to conduct business with the Postal Service?
- | | | |
|--|------------------------------|-----------------------------|
| Post Office in vicinity of where you work or shop | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| usps.com website | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Stamps by Mail | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Stamps by Phone | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Stamps Online | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Click-N-Ship | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| Buy stamps or mail packages at grocery or other retail store | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

4. Do you currently use local businesses in the community?
 Yes No
5. If you answered "yes" in Question 4, would you continue to use these businesses if the Lackawanna Branch is discontinued?
 Yes No
6. Do you currently use businesses in nearby communities?
 Yes No
7. Do you have a means of transportation available to get to another Post Office in the vicinity?
 Yes No
8. How do you currently receive your mail?
 Carrier PO Box Other

Additional Comments:

Name: _____

Address: _____

City, State Zip: _____

Date of Removal: 11/07/2011

Date of Posting: 09/06/2011



UNITED STATES POSTAL SERVICE
INVITATION FOR COMMENTS ON THE PROPOSAL TO CLOSE
THE LACKAWANNA, NY BRANCH
AND CONTINUE TO PROVIDE
SERVICE BY CITY DELIVERY

To the customers of the Lackawanna Branch:

The Postal Service is considering the close of the Lackawanna Branch for reasons stated in the accompanying proposal.

During the 60-day posting period from 09/06/2011 through 11/07/2011 you are invited to provide written comments. Comments will be most helpful if they offer specific opinions and information favorable or unfavorable regarding the potential effect of the proposed change on postal services and on the community. Your comments will be carefully considered and will be incorporated into the official record, which will be made public if the proposal is finalized.

Copies of the proposal and optional comment forms are available upon request at the Lackawanna Branch and South Side Buffalo Station. If you choose to use the optional comment form and need additional space, please attach additional sheets of paper.

Please return the comment form to:

NORBERT RZESZUTEK
1200 WILLIAM ST RM 205
BUFFALO, NY 14240-9345

For more information, you may call NORBERT RZESZUTEK at (716) 846-2426 or write to the above address.

Thank you for your assistance.

A handwritten signature in cursive script, appearing to read "John PheLAN".

JOHN PHELAN
1200 WILLIAM ST RM 205
BUFFALO, NY 14240-9345



Date of Posting: 09/06/2011

Date of Removal: 11/07/2011

PROPOSAL TO CLOSE
THE LACKAWANNA, NY BRANCH
AND CONTINUE TO PROVIDE
SERVICE BY CITY DELIVERY

DOCKET NUMBER 143790 - 14218

I. RESPONSIVENESS TO COMMUNITY POSTAL NEEDS

The Postal Service is proposing to close the Lackawanna, NY Branch and provide delivery and retail services by city delivery under the administrative responsibility of the South Side Buffalo Station, located one miles away.

The office is being studied for possible closing or consolidation due to the following reasons: Due to declining office workload, which may indicate that maintaining this facility is not warranted. There are a number of alternate sites within a short radius of this office that can provide the sale of stamps and the mailing of most package items.

The Post Office facility had severe building deficiencies that included: Air conditioning not working properly. The Lackawanna Branch provides retail service from 900 to 1100 - 1200 to 1700 Monday through Friday and 900 to 1100 on Saturday. Over the past several years there has been a decline in the amount of walk in revenue generated. *End 12-3*
The revenue trend is as follows: FY 07 \$ 436,805, FY 08 \$ 430,620, FY 09 \$ 411,242 and FY 10 \$ 338,140.

On September 20, 2011, representatives from the Postal Service will be available at Lackawanna Senior Citizens Building, 340 Martin Rd to answer questions and provide information to customers.

On or about September 04, 2011, questionnaires were distributed to delivery customers of the Lackawanna Branch. Questionnaires were also available over the counter for retail customers at the Lackawanna Branch.

If this proposal is implemented, delivery and retail services will be provided by the South Side Buffalo Station, an EAS-20 level office. Window service hours at the South Side Buffalo Station are from 830 to 1700, Monday through Friday, and 830 to 1500 on Saturday.

Some advantages of the proposal are:

1. The rural and contract carriers may provide retail services, alleviating the need to go to the post office. Stamps by Mail order forms are provided for customer convenience.
2. Customers opting for carrier service will have 24-hour access to their mail.
3. Savings for the Postal Service contribute in the long run to stable postage rates and savings for customers.
4. CBUS can offer the security of individually locked mail compartments. Parcel lockers provide convenient parcel delivery for customers.
5. Customers opting for carrier service will not have to pay post office box fees.
6. Saves time and energy for customers who drive to the post office to pick up mail.

Some disadvantages of the proposal are:

1. The loss of a retail outlet and a manager position in the community. Retail services may be provided by the rural or contract delivery carrier.
2. Meeting the rural or contract delivery carrier at the box to transact business. However, it is not necessary to be present to conduct most Postal Service transactions.
3. A change in the mailing address. The community name will continue to be used in the new address. A carrier route address will be assigned.

Taking all available information into consideration, the Postal Service concludes this proposal will provide a maximum degree of effective and regular postal services to the community.

II. EFFECT ON COMMUNITY

Lackawanna is an unincorporated community located in Erie County. The community is administered politically by City of Lackawanna. Police protection is provided by the Lackawanna Police Department. Fire protection is provided by the Lackawanna Fire Department. The community is comprised of Population 17399 (2010 Census) Population is mixed between retirees and commuters. Brownfield restoration has created a new business park on Ship Canal Drive, and those who commute to work at nearby communities and may work in local businesses.

Businesses and organizations include: Steel Winds, Premium Coffee, RAF Supply, Park Ave Coat Company, K-D Hydro, SRI Sprinklers, International Thermal, Great Lakes Diesel, Advance Supply, Quickcrete, Byrne Dairy, Kenworth, Haz-Mat Environmental, Son-Wil Distributors, CertainTeed, Safety Clean, Metalico, . Residents may travel to nearby communities for other supplies and services.

Nonpostal services provided at the Lackawanna Branch will be available at the South Side Buffalo Station. Government forms normally provided by the Post Office will also be available at the South Side Buffalo Station or by contacting your local government agency.

This Lackawanna Branch is not listed as a historic landmark. The community name will be maintained for customer addressing, and the Zip Code is not expected to change.

Based on the information obtained in the course of this discontinuance study, the Postal Service concludes this proposal will not adversely affect the community and every effort will be made to maintain the identity.

III. EFFECT ON EMPLOYEES

Additionally there are 1 craft employees assigned to this unit. These employees will be relocated per the National Labor Agreements.

IV. ECONOMIC SAVINGS

The Postal Service estimates a ten year savings of \$ 1,527,820 with a breakdown as follows:

Building Maintenance	\$ 0
Utilities	\$ 112,460
Transportation	\$ 0
EAS Craft & Labor	\$ 946,750
Contracts	\$ 34,860
Rent	\$ 433,750
Relocation One-Time Cost	\$ 500
Total Ten Year Savings	\$ 1,527,820

V. OTHER FACTORS

The Postal Service has identified no other factors for consideration.

VI. SUMMARY

The Postal Service is proposing to close the Lackawanna, NY Branch and provide delivery and retail services by city delivery under the administrative responsibility of the South Side Buffalo Station, located one miles away.

The Lackawanna Branch provided delivery and retail service to 127 PO Box or general delivery customers and no delivery route customers.

There will no longer be a retail outlet in the community. However, delivery and retail services may be available from a rural or contract delivery carrier, which could alleviate the need to travel to a Post Office for service. The Postal Service will save an estimated \$ 1,527,820 over the next ten years. A disadvantage to some may be in meeting the rural or contract delivery carrier to transact business. However, it is not necessary to be present to conduct most Postal Service transactions with rural or contract delivery carrier.

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



JOHN PHELAN
Postmaster

09/06/2011 Date