

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative)
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Docket No. N2011-1

**Rebuttal Testimony of Mayor Donald Hobbs
On Behalf of
The National League of Postmasters**

1 **Autobiographical Information**

2 My name is Donald Hobbs. I am the Mayor of Lohrville, Iowa, in Calhoun County,
3 Iowa, and I also serve as the Director of the Iowans for Post Office Services (IPOS). Please note
4 that the title of the group is Iowans for *Post Office* Services, not Iowans for *Postal* Services.

5 I have a Bachelor of Music Degree (B.M.) in church music from Drake University.
6 While I am the Mayor of Lohrville, I also am an organ builder and technical designer at Dobson
7 Pipe Organ builders, Ltd. in Lake City, Iowa, another small rural town in Iowa. Dobson is an
8 internationally renowned pipe organ builder and was recently chosen to build a new 44-stop
9 three-manual and pedal mechanical action organ for the Chapel of Merton College, at Oxford
10 University.

11 Lohrville, Iowa, is a small town in rural Iowa, located about 97 miles northwest of Des
12 Moines. Our population is 368, and the estimated per capita income in 2009 was \$17,404. Our
13 estimated median income in 2009 was \$31,000 and the estimated median age of a Lohrville
14 citizen is 40. Lohrville was incorporated in 1882.

15 Eighty five percent of Lohrville citizens have at least a high school degree, with 17.7%
16 having Bachelor's degrees, and 8% having graduate or professional degrees. Lohrville's citizens
17 work as farmers and farm managers, agricultural workers and agricultural supervisors,
18 driver/sales workers, truck drivers, law enforcement officials, insurance agents, teachers, and
19 retail sales workers, and other sales and related workers, including supervisors.

20 Iowans for Post Office Services (IPOS) is a group of Mayors and community leaders
21 from cities and community organizations working together to help preserve our Post Office
22 Services. IPOS is not a group formed to fight the U.S. Postal Service, but rather to help save it.

1 We represent approximately 50 towns and cities in Iowa, plus a number of other community
2 groups and leaders, including the Iowa League of Cities.

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1 **Purpose and Scope**

2 The purpose and scope of my testimony is to provide the Commission with specific
3 information concerning the role of our Post Offices in local rural communities, and to show why
4 closing rural Post Offices is destructive of rural communities, rural economies, and ultimately of
5 rural America.

6 Moreover, my testimony shows how and why rural letter carriers and Village Post
7 Offices will not—in the real world—replace the necessary services that our Post Offices provide
8 to us, and thus why the rhetoric of the Postal Service that these changes (i.e., shutting down
9 thousands and thousands of post offices) will not degrade the service that rural America
10 experiences is being met by derisive laughter throughout Iowa and presumably the rest of rural
11 America.

12 I speak today not only on behalf of Lohrville and its citizens, but also for the mayors and
13 citizens of all the other towns that make up the membership of the Iowans for Post Office
14 Services.

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1 **I. Service to Rural America**

2 I have heard gratuitous statements from the Postal Service that it will continue to provide
3 satisfactory service, indeed better service, to rural America, even after all these post offices are
4 closing. It really irritates me. Few rural citizens believe that and most laugh at the notion, as I
5 have said.

6 For instance, in preparation for this testimony I asked a number of citizens of Lohrville—
7 which is a fairly typical rural town—what their image was of the Postal Service and what they
8 thought of the notion of postal “service” in general. People generally responded with laughter
9 and comments like “Service?”, or they said something like “That [service] is not what they are
10 trying to provide with this [shuttering our Post Offices].” I hear all of these same sentiments
11 from people around our state living in towns where a Post Office is being studied for closure, as
12 well as other rural towns.

13 I feel the truth of the matter is that the Postal Service wants to blow off its mandate to
14 provide rural America with the maximum degree of service that the law requires, and is using its
15 financial challenges as an excuse to do that. I am still not sure why the Postal Service is doing
16 this. My understanding is that they will only save somewhere around \$200 million at most if
17 they close all of the post offices that they are considering right now. That is something like
18 3/10s of one percent of their operating budget. I would think—just off the top of my head—that
19 the monetary value of the damage to rural America and the damage to the Postal Service’s
20 reputation and service network would be much greater than that.

21 Many citizens and business owners proclaim that they will not use the Post Office as
22 much as they do now if our Post Office closes. Speaking with the owner of one of our thriving
23 businesses, he expressed this in earnest. Currently, this excavating company sends all bills,

1 statements, bids, bill pay and package shipments through the Post Office. He said they are
2 willing to go the extra effort to send all correspondence electronically and will solely use an
3 alternative delivery service for packages.

4 I know that closing my Post Office would hurt my town. I will explain below why my
5 town and the other towns of the IPOS need post offices.

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II. Village Post Offices

8 Before I do that, I would like to address the notion of the Village Post Office which the
9 Postal Service has suggested to replace some of the post offices they are going to close.

10 From what I understand, a Village Post Office would only sell First Class Stamps, flat
11 rate boxes, and perhaps have post offices boxes on their premises. I have asked the National
12 League of Postmasters for a list of the services normal post offices provide as contrasted to the
13 services that a Village Post Office would provide. This is what they provided me.

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How Does a Village Post Office Line Up Against a Real Post Office?

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Postal Products/Services	Real P/O	Village P/O
Forever Stamps	✓	✓
Denominated Stamps	✓	
First Class Mail	✓	
First Class Mail International	✓	
Priority Mail (weight based)	✓	
Priority Flat Rate Boxes/Envelopes	✓	✓
Express Mail	✓	
Certified Mail	✓	
Return Receipt	✓	
Insured Mail	✓	
Return Receipt for Merchandise	✓	
Certificate of Mailing	✓	

Restricted Delivery	✓	
Collect on Delivery (COD)	✓	
Special Handling	✓	
Adult Signature Required	✓	
Media Mail	✓	
Parcel Post	✓	
Money Orders	✓	
Signature Confirmation	✓	
Delivery Confirmation	✓	
Registered Mail	✓	
Bulk Mail Acceptance	✓	
Zip Code Information	✓	
International Mail	✓	
First Class Int Mail Parcels	✓	
Customs forms	✓	
File a Change of Address	✓	✓
Apply for a Passport	✓	
Stamped Envelopes	✓	
Stamped Postcards	✓	
Ready Post Products and Supplies	✓	
Zip Code Information	✓	
Sure Money (Dineroi Seguro)	✓	
Mailing Requirements	✓	
File an Insurance Claim	✓	

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2 Looking at this chart, I see that many of the services my town uses would not be provided by a
3 Village Post Office. And, if I count correctly, the League has calculated that an independent post
4 office provides 36 different types of products or services, while a Village Post Office would
5 provide only three. Indeed, from what I understand, a Village Post office has no acceptance
6 function beyond flat rate boxes, and no real distribution function.

7 Most of the businesses in our town are running with a minimum of staff already. They
8 run as efficiently as they can in regards to staff and space. Some may have space, while others
9 do not. Their primary purpose is to provide the best service possible in their area of expertise. I

1 don't think many, if any, would be interested in a Village Post Office because most are hesitant
2 to expand into a field not related to their primary business.

3 A Village Post Office would not meet the needs of my town or the needs of the other
4 small towns in Iowa, and it would not provide the quality or quantity of services we need.
5 Interestingly, in some of the community meetings we have had, the Postal Service has said they
6 won't even replace the post office they are killing with a Village Post Office. What type of
7 service is that? Surely it is not the maximum degree of service. I looked up the word
8 "maximum" in the Random House Dictionary, and it defined the word as representing "the
9 highest amount, volume or degree attained or attainable." How can this proposal be consistent
10 with that? It seems to be that this proposal is removing the maximum degree of service to rural
11 America, not maintaining it. In fact, I have witnessed some USPS managers leading
12 discontinuance public meetings leaving out the word 'maximum' when they refer to the
13 continued ability to provide effective service to the community.

14 **III. What Post Offices Do for My Town**

15 Our Citizens use the Post Office for a variety of services.

16 They, of course, buy stamps and flat rate boxes. More broadly than that, they use the
17 Post Office to send packages at Christmas time, and at other times, often to their kids and
18 grandkids in college and in the military. Some of those packages can be quite large. Further,
19 some of those go to international destinations for kids in foreign exchange programs, for foreign
20 students they have met here in exchange programs, and to their sons and daughters serving in the
21 military in Iraq, Pakistan, and other places.

22 Some of our citizens order medications through the mail, and some receive their mail
23 through post office boxes. I have a hunch that is typical for most of the very small rural post

1 offices on the closing list. Today, when they arrive, the medications are stored in PO Boxes in
2 the Post Office until picked up, and are not subject to weather conditions if not picked up
3 quickly. In hot or icy weather, some of our people do not get out very much, so their mail may
4 sit for a few days, until they can get out to get it. Being in the post office boxes takes care of
5 concerns about heat, humidity, and cold.

6 In terms of seniors and limited ability persons, having to go to an outside mailbox every
7 day in high heat or snow and ice would be a far different cry and much more taxing than what
8 they do today. Today, they leave their mail in the Post Office if they feel getting it would be too
9 hard for them that day, or because of the weather. For senior rural citizens, a short drive to the
10 Post Office, where there is a well shoveled sidewalk and a climate controlled environment, to
11 pick up mail or to mail something is far preferable to dealing with the elements in general with a
12 mailbox. At the Post Office, they likely will have a safer walk, with less likelihood of a fall.
13 Falls are the leading cause of death due to accidents among the elderly. In Lohrville, as in other
14 rural communities, we value our elders. This is a huge concern of people in our town. Many of
15 these people also rely on the USPS employee to ensure they are mailing a package properly and
16 to assist them in filling out any required forms.

17 When it comes to prescriptions narcotics, many of our citizens must order them through
18 the mail because of their insurance. Those packages must be signed for by the recipient at the
19 time of delivery. Since many people are not available when the postman comes, they come
20 down to the Post Office to sign for it. The idea of having to sign for something—which you
21 can't really do if there isn't a post office—is a big deal. In addition to the narcotic prescriptions,
22 I know that our town government and other town governments regularly send certified letters to
23 citizens concerning ordinances that are not being followed, and for other legal actions and legal

1 reasons. Those letters must be signed for. Without a post office, they cannot be reasonably
2 signed for.

3 Many businesses mail packages that must be insured, registered or mailed second day or
4 Express. These businesses cannot take the time—particularly in these extremely tough economic
5 times—to stand at the mailbox to handle sending them. Neither can they afford to take an extra
6 30 minutes to drive to another town to send the package. Additionally, if that post office were
7 handling the business of several that had been closed down, one would have to assume that the
8 wait in lines would be longer.

9 Moreover, some of these businesses have times when they only have one person in the
10 office. These businesses would have to close down for the entire time it would take to drive to a
11 post office in another town to send it. That is certainly no maximum service, much less effective
12 and reasonable service.

13 Another problem for businesses is late day pickup, and the Postal Service’s incessant
14 drive to close rural post offices has many of the businesses in the towns represented by IPOS
15 worried. For instance, several insurance companies and an accounting firm in our town often
16 receive (or call for) a document in the morning, and that document must be turned around and
17 mailed out that same day. There are times, many I am told, when an insurance company will
18 cancel a policy, increase a premium, or tack on additional fees if a document is not turned around
19 and entered into the mail by the same day. With the closing of our post offices, canceling will
20 not be available that same day to ensure that the piece is “entered” into the mail on the
21 appropriate day.

22 Our public Library is one place that will have to deal with the packaging situation. With
23 interlibrary loan programs they often need to send books to other libraries near the end of the

1 day. The Library budget, like libraries in other towns, is tight. They do everything they can with
2 the money they have. In order to fulfill their loan obligations they will have to use an alternative
3 delivery service. They do not have the budget or personnel to drive to a neighboring town to put
4 a package in the mail.

5 Our town and other small towns have a high percentage of low to moderate income
6 (LMI) individuals. These people are most likely to not have bank accounts and thus must
7 regularly buy postal money orders. They bank through the post office. Many of these
8 individuals, because they are strapped financially, also have limited access to automobiles.
9 Some do not own an automobile, and for those that do, they tend to drive them as little as
10 possible to save on gas, particularly with today's prices. Thus, driving to the next town for them
11 is not only a burden on their time but also a burden on their finances.

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13 **IV. Why Rural Letter Carriers are Not “Post Offices on Wheels”**

14 I know the Postal Service loves to call rural letter carriers “Post Offices on wheels,” but
15 the truth of the matter is that they simply are not. They are, mind you, a key part of rural
16 America, and a vital and time-honored part of the American way of life. No question about it.
17 However, at a public meeting for the discontinuance of a Post Office I heard the USPS
18 representative actually refer to the “Post Office on Wheels” as a disadvantage. They do carry
19 stamps and can sell them along their route and can take care of some other matters. That is a
20 nice and helpful service. They also can be particularly helpful, in extra ways, during
21 emergencies and they are always “eyes on the alert” for unusual developments or for problems as
22 they drive their routes each day. Moreover, most rural letter carriers are extremely nice men and
23 women, the salt of the earth.

1 But they simply are not Post Offices on wheels and they are not substitutes for post
2 offices, no matter how nice that catch slogan sounds. The key reason is that rural carriers are
3 always on the move, and to buy anything from them, you have to be in the right place at the right
4 time. Moreover, you have to be willing to waste your own time to wait for them, since my
5 experience is that they never quite come by a mailbox at exactly the same time each day. It is
6 patently unreasonable to think that the normal rural citizen will be able to interrupt his work, or
7 his farming, hike out to the mailbox, and stand or sit until the carrier comes by.

8 Moreover, were this misguided effort to close small rural post offices to succeed, a rural
9 carrier's day would become longer and unpredictable, and the timing of his or her route and
10 arrival times at individual mailboxes even more unpredictable. I have already heard reports of
11 our local rural delivery carrier having so much work that he had occasion to miss the truck
12 leaving for Carroll with outgoing mail. Even assuming customers were willing to go sit or stand
13 in 90 degree heat or -20 degree snow for half an hour to wait for this carrier, how could the
14 carrier possibly have enough time to do his deliveries and meet the retail needs of all of his
15 customers along his route? What if even a quarter of the persons on the route are standing by the
16 box needing various services? What if half of those take ten minutes to do their business?

17 Finally, low-to-moderate income individuals tend to work a lot at odd jobs, or work at
18 odd hours, in order to make ends meet. Even if a non low-to-moderate person were able to waste
19 his or her time by sitting around and waiting for the carrier to arrive, low-to-moderate income
20 individuals would not typically be able to stand at a mailbox and wait to greet the delivery
21 person to do their business. It just would not be practical.

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V. Economic Development & Community Identity

So far I have generally addressed the relationship of our Post Offices to our towns in terms of the services they provide. Rural Post Offices are much more than that.

A. Community Identity

Rural Post Offices are at the heart and soul of a rural community. Not only do they provide a valuable service connecting us to the world, they are that stalwart that has, historically, been in every community across America. The Post Office is the place that everyone in a community uses. That is why it is the tried and true place for public notices, legal and mundane. Most cities have designated the Post Office as one of their official posting locations because of this.

This is a place where people happen to see each other and stop to chat. No other place brings in everyone from a community. This is where random citizens see each other and talk about the weather, the news, how the high school sports team did, or complain about the latest actions the City took. Believe me, as the Mayor, I know. I have had discussions there, as Mayor, with our Librarian and community club president that resulted in an event being planned. I am more likely to see the Librarian at the Post Office than I am at the Library, because of the frequency of stopping. I could list dozens of activities, actions and ordinances that had their beginnings in the lobby of our Post Office while the postal worker was busy handling business. For instance, a Charity Ball was conceived and leadership selected at the Post Office. The condition of a building in town was discussed at the Post Office and the idea to get a grant that we ended up receiving to remove the deteriorated building was thought up at the Post Office. When it was time for our town to celebrate 125 years of existence, an untold number of activities

1 were born and planned at the Post Office which created a tremendous showing of community
2 identity. After all, this is OUR Post Office, and we are proud of it. People are generally slower
3 to move in and out of the Post Office because of a chance meeting, and as they keep running into
4 more and more people. One of our local pastors has been known to stand in the corner to read
5 the paper, just to be with the people. These are the discussions and happenings that keep not
6 only our image alive, but also our heart and soul.

7 Rural communities here in Iowa generally have a strong community image, sometimes
8 tied to the origins of the founders or to some primary employment that is, or was, in the town.
9 We are all holding on to these community images while trying to keep our towns vital. Our
10 citizens have withstood the growing move of urban migration. With the loss of population we
11 have seen the inevitable loss of businesses. We strive to keep our community image alive, no
12 matter the size of our community. That is why people are here, the very thing that is our town.
13 In fact, the motto that Lohrville has adopted is “Better not Bigger,” reminding each of us that we
14 are to be a better community, no matter the population.

15 For many, the absence of a Post Office will overshadow their will to keep the community
16 identity. Many having gone through school consolidations, which took some of their identity
17 already, are facing community images that are weary to begin with.

18 One example of a very weary community image is Searsboro, Iowa. This town of 148
19 citizens ‘passed away’ in August, 2011, at the age of 135 years. This is the first town to
20 unincorporate in Iowa in 6 years. They have been fighting hard to keep the town going. In the
21 last decade they faced many trials in addition to the urban migration. When they received word
22 that the Post Office would close September 23, 2011, it was the last straw. How can a
23 community that is working with all their might to keep going withstand such a mental blow?

1 *The Des Moines Register* did a good story on this::
2 [http://www.desmoinesregister.com/article/20110906/NEWS03/309060048/-1/SPORTS09/Munson-post-office-s-](http://www.desmoinesregister.com/article/20110906/NEWS03/309060048/-1/SPORTS09/Munson-post-office-s-closure-Searsboro-surrenders)
3 [closure-Searsboro-surrenders](http://www.desmoinesregister.com/article/20110906/NEWS03/309060048/-1/SPORTS09/Munson-post-office-s-closure-Searsboro-surrenders)

4 In thinking of this, I decided to look on the web for some more good examples. I found
5 this wonderful piece in a Wisconsin newspaper, *The Superior Telegram*,
6 <http://www.superiortelegam.com/event/article/id/56522/> and I have copied it below.

Rural Post Offices are identity

8 Jamie Glass of Herbster was checking his post office box when the postmaster told him the office could be closed.

9 “Why?” he asked.

10 Glass has the distinction of renting post office box No. 1 in Herbster.

11 “So we’ve been using this post office for quite a while now, for a couple of three generations,” Glass said. “It’s worse for my
12 father because he’s retired and disabled. So having this close by, he doesn’t last very long in a car or on his feet before he
13 has to rest anyways.”

14 Babcock, Beetown, Nelsonville, Hawthorne, Herbster — they’re among the hundreds of Wisconsin villages and
15 unincorporated towns that share the rural lifestyle. They also are among the 41 Wisconsin post offices on the Postal
16 Service’s potential closure list. And the people see that as a threat to small town life.

17 Many of Herbster’s 104 people are retired and don’t use computers to pay their bills or send e-mail. Rita Dehn is one of
18 them. She’s upset at the possibility of losing her post office.

19 “I was shocked. I really was,” Dehn said. “I mean I was really surprised. I don’t see how you could close it. I mean if the Post
20 Office got a problem, but gee, why take it out on the people? You know I get my medicine in the mail. In the winter time you
21 have to go all that distance just to get your mail. How come they want to close Herbster?”

22 The 2010 U.S. Census shows rural America makes up just 16 percent of the population, the lowest percentage ever. Just 20
23 years ago, 25 percent of people hailed from small towns. Pete Schenck runs the area’s ambulance service. He thinks if they
24 take away the post office, they’ll take away Herbster’s identity.

25 “We’re starting to see some vitality. We’re starting to see some hope for the future. And now it’s gone. You remove 54844,
26 we’re gone from the map,” Schenck said.

27 Congressman Sean Duffy, R-Ashland, says the closing list should be returned to sender. With many of the offices in rural
28 areas like his northern district, he says they shouldn’t be closed.

29 “For me, I have been aggressively advocating for our post offices,” Duffy said. “If you’ve been a member of a small
30 community, you know that often times your identity is tied up within your post office. You may not have a police force but you
31 do have your post office.”

1 Duffy says several members of Congress are getting behind bills that would send the closing list to the dead letter office.

2 Herbster Town Clerk Sheryl Isaksson sees it the same way — the post office can be the heart of a community, and losing it
3 would be difficult for Herbster.

4 “It would go away. It would totally go away,” she said.

5 Herbster Town Supervisor Jane Bucy thinks closing rural branches could mean the end to many small towns.

6 “Oh, it’s the life of the community,” Bucy said. “We get a lot of elderly people here who are dependent upon it for medicines
7 and things. They don’t get around very easily. Packages. I mean, it’s just the life of the community

8 Eight miles east on Highway 13 is the Lake Superior community of Cornucopia, population 98. It has Wisconsin’s
9 northernmost post office. Resident Maggie Doetkett is glad their post office is not on the list.

10 “Coming to the Post Office, it’s usually ten, fifteen minutes of ‘Hi, how are you? How are the grand kids? How is the dog?’”
11 Doetkett said. “Oh I hope Corny is never on that list. I mean living north of Highway 8, we really depend on a postal service.”

12 Just being on the list doesn’t mean a post office will be closed. Postal Service spokesman Pete Nowacki says a more
13 definitive list will be released in September, followed by a 60-day comment period where townfolk can make their case
14 about isolation and identity.

15 “That’s the type of information that we want brought to us as we start this public contact process,” Nowacki said. “At this
16 point, it’s a bit of a one size fits all. We’ve identified these offices based on certain numbers and certain factors, and now we
17 start taking a look at what makes each one unique and what makes each situation different from another.”

18 Nowacki says even if a post office is closed, the zip code and town will remain on the mailing address. But Cornucopia’s
19 Postmaster Chris Figge, who’s held that job there since 1974, says for rural towns, that’s not the point.

20 “I feel sorry for Herbster. I feel sorry for anybody that’s getting a cut and losing their post office. If it’s anything like
21 Cornucopia’s Post Office, we always joke in here if there’s a line in here, everybody says ‘get a camera,’ there’s a line in the
22 Cornucopia Post Office. And who brought coffee and who’s bringing the rolls.”

23 **B. Community Development**

24 While the notion of Community Identity is hard to quantify, it is nevertheless a critical
25 factor in the life of a small town. A much easier quality to quantify is the fact that losing one’s
26 Post Office kills any community development program a small town might have. Lohrville is
27 not at a point where we have a dedicated economic development group of our own. However,
28 we are members of a countywide group, Calhoun County Economic Development Corporation.
29 Our City clerk meets with the director and economic directors from other towns in our county to
30 coordinate and support each other in economic development. We are actively looking to support

1 new and existing businesses in our town, and I know that without a Post Office of our own, we
2 are going to have a very difficult time. No business, which is considering locating in a small
3 town, will pick a small town without a post office over a small town with a post office.
4 Moreover, I know that in England, small businesses participants in government focus groups
5 have said that they would consider moving their business from their village to another, if their
6 village lost its Post Office, just to have a post office within walking distance. As a Mayor of a
7 small rural Iowa town, I find that type of talk disturbing. Small towns have enough challenges to
8 face without having to face business leaving our towns because the Postal Service decided to
9 close a small post office.

10 Thus, not only would the Postal Service be killing the identity of thousands of small rural
11 communities if they choose to continue this program, but they would also be condemning
12 thousands of local community development programs, thus ensuring that the economic future of
13 those communities would be grim.

14 The Postal Service is supposed to be thinking of the community as it gathers data from
15 the community. I believe that the Postal Service has a responsibility to think of the community
16 and consider whether it will survive, and whether the Postal Service will be favoring the
17 economic development of one community over another. After all, the Postal Service is supposed
18 to be binding the nation together, not dividing the nation asunder, as it is doing now.

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Conclusion

21 Rural Post Offices are the heart and soul of America and the provision of post office
22 services is at the core of the Postal Service's missions. They do not cost the Postal Service a lot
23 of money, relatively speaking, and their value to small towns such as mine is priceless.

1 Madame Chairman, members of the Commission, it is your duty to evaluate this proposal
2 and to issue an advisory opinion on the matter. I very strongly urge you to find that this proposal
3 is not in the public interest, would have a devastating effect on rural America, and should not be
4 continued on a massive scale.