Postal Regulatory Commission
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BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

SHERWOOD CARRIER ANNEX
TOPEKA, KANSAS

Docket No. A2023-2

UNITED STATES POSTAL SERVICE RESPONSE TO ORDER NO. 6681 ON MOTION TO DISMISS AND ORDER NO. 6732 ON SUPPLEMENTAL MOTION TO DISMISS
(October 23, 2023)

On August 16, 2023, Catherine Hackett-Brown submitted a Participant Statement purporting to appeal, in accordance with 39 U.S.C. § 404(d)(5), the Postal Service's relocation of the Sherwood Carrier Annex (Annex). The Commission issued a Notice and Order Accepting Appeal and Establishing Procedural Schedule (Order No. 6636) on August 22, 2023.

On August 25, 2023, in accordance with Order No. 6636, the Postal Service moved to dismiss the appeal (Motion to Dismiss) on the basis that the decision to relocate the Annex operations is not appealable under section 404(d)(5) and because it appeared that Petitioner Hackett-Brown did not have legal standing to pursue the appeal.

On September 13, 2023, the Commission ruled that Petitioner Hackett-Brown had failed to demonstrate legal standing to pursue the appeal and allowed her until September 20, 2023, to amend her Participant Statement to include information sufficient to establish legal standing. Order No. 6681 at 12. The Commission further ruled that, if Petitioner Hackett-Brown filed the specified information necessary to establish legal standing and the Postal Service continues to oppose her eligibility to participate in this Docket, "then

the Postal Service shall file an opposition within 3 days of posting her supplemental filings to the Commission website." *Id.* at 9, 13.

Order No. 6681 also provided that, by September 20, 2023, "any patron served by the Sherwood Carrier Annex other than the Petitioner may seek to substitute in [Petitioner Hackett-Brown's] place by filing … (1) a statement indicating that they were a patron served by the Sherwood Carrier Annex (and if so, their address) … and (2) a declaration [that] they assert that the Postal Service has not met its notice obligations or has interfered with their ability to file a timely appeal." *Id*. at 8, 12. In such case, the Postal Service would have three days to oppose the substitute Petitioner's standing to pursue the appeal. *Id*. at 9, 13.

Finally, the Commission ruled that, if a Petitioner with proper standing is established, the Postal Service must, within 10 days (1) provide the administrative record and (2) provide a declaration as to what, if any, retail services were provided at the Annex. *Id*. at 10-11, 13. The Commission would thereafter resolve the outstanding jurisdictional question raised in the Postal Service's Motion to Dismiss. *Id*. at 9-11.

On September 18, 2023, Petitioner Hackett-Brown filed an amended Participant Statement including three supporting documents. That same day, seemingly two new appeals were also filed: one by Nelson Nolan, who submitted a Statement and Declaration of Substitute Petitioner, and a possible second filed by Catherine Crawford, whose declaration was an attachment to Petitioner Hackett-Brown's amended Participants Statement.

On September 21, 2023, the Postal Service filed a Supplemental Motion to Dismiss each of these appeals as follows:

a. Hackett-Brown's appeal for lack of standing after failing to demonstrate that she was a person served by the Annex;

b. Nolan's appeal as untimely having been filed more than 30 days after the notice to close the Annex was posted and having not demonstrated that the Postal Service impaired his ability to timely appeal;

c. Crawford's appeal as untimely, as the appeal was filed more than 30 days after the notice to close the Annex was posted and having not demonstrated that the Postal Service impaired his ability to timely appeal, and for lack of standing in that Crawford failed to declare that she was a person served by the Annex in compliance with the Commission's Order No. 6681.

On September 21, 2023, the Postal Service also moved to stay operation of that part of Order No. 6681 that requires the Postal Service submit the administrative record and a factual declaration until 10 days after the Commission ruled on the Postal Service's Supplemental Motion to Dismiss.

On September 26, 2023, the Commission granted the Postal Service's Motion to Stay the requirement for filing an administrative record and a factual declaration pending further order of the Commission. Order No. 6705 at 3.

On October 11, 2023, the Commission confirmed dismissal of Hackett-Brown's and Crawfords appeals for lack of standing. Order No. 6732 at 11. The Commission could not, however, decide the timeliness of Nolan's appeal because of the underlying factual question as to whether the Annex was a retail facility:

> Therefore, the Commission cannot rule on the Supplemental Motion to Dismiss as to Substitute Petitioner Nelson Nolan's appeal without additional facts regarding whether the Sherwood Carrier Annex was a retail

> facility or not, as the timeliness of Substitute Petitioner's appeal is intertwined with the nature of the Sherwood Carrier Annex.

Id. at 10. The Commission, therefore, ordered the Postal Service to file the Annex relocation administrative record and a declaration as to what, if any, retail services were provided at the Annex.

In accordance with that Order No. 6732 and Order No. 6681, the Postal Service hereby submits: (A) a declaration confirming that the Annex provided no retail services but was merely a mail sorting and delivery facility—subsequently relocated to the new Topeka S&DC—which, correlated to those mail processing and delivery operations, also served as a drop-off for postage-paid mail and pick-up for held mail and undeliverable accountable mail—subsequently relocated to a nearby full-service Post Office; (B) materials related to relocating the Annex; and (C) an assessment of the jurisdictional question that was reserved in Order Nos. 6681 and 6732 for further consideration.

A. The Declaration Confirms that the Annex did not Provide any Retail Services

In accordance with Order Nos. 6681 and 6732, the Postal Service provides the Declaration of Guy M. Moeckel (Declaration) describing the Annex operations. A copy of the Declaration is attached hereto under Tab A. As the Declaration makes clear, the Annex was only ever used to house mail carrier routes and never provided, and was never intended to provide, retail services, as it had no retail service counter nor Post Office Boxes for customers. Declaration, ¶¶ 6, 9. Nor did the Annex sell postage, although it maintained a small amount of stamp stock for sale to mail carriers to satisfy customer orders—those carriers continue to provide stamp sales on their routes notwithstanding that their routes now originate from the Topeka Sorting and Delivery Center (S&DC). *Id.*,

¶¶ 12, 20. Postal retail services are instead provided at a Contract Postal Unit located in the supermarket across the street from the Annex. *Id.*, ¶ 7.

The Annex did offer "Dutch-door" service where customers, after ringing a doorbell, could drop-off postage-paid mail and packages or pick-up held mail or undeliverable accountable mail. *Id.*, ¶ 7. Such services, however, could also be provided, and are still provided, to the customers by their mail carriers. *Id.,* ¶¶ 10-11, 20.

The Dutch-door services provided at the Annex were relocated to the Gage Post Office, which is a full retail unit located approximately four miles from the Annex, staffed by retail associates, and offers a wide variety of customer services. *Id.*, ¶ 21. All the mail carriers were reassigned to the Topeka S&DC. *Id.*, ¶ 20. These carriers have the same responsibilities as before and the carrier routes that previously operated out of Sherwood have not changed other than they now operate out of the Topeka S&DC. *Id.*

The Commission also expressed interest in the Annex description on the USPS.com website. Order No. 6681 at 11. While that description could certainly have been better presented, it does not establish that retail services were provided at the Annex. As explained in the Declaration, the Annex did have Lobby and Collection Hours relating to its Dutch-door mail pick-up and drop-off functions. Declaration, ¶¶ 15-16. The Dutch-door lobby also had a mail collection slot and a "Blue Box" was (and remains) at the location for postage-paid mail drop-off. *Id.*, ¶¶ 11, 15-16, 22. The entry for PO Box Access Hours, however, is an unfortunate inclusion as the Annex had no PO Boxes to access. *Id.*, ¶¶ 6, 17. And the remaining entries for Pickup Accountable Mail, Pickup Hold Mail, and Call Referral all accurately refer to the mail pick-up and drop-off functions provided at the Annex. *See id.*, ¶¶ 18-19.

Finally, on September 18, 2023, Petitioner Hackett Brown submitted an amended Participant Statement to which she attached a sworn statement by Postal Service employee Catherine Crawford, who previously worked at the Annex. In her statement, Crawford describes duties she performed while working at the Annex. Each of those duties is addressed and clarified in the Declaration—none involve retail services. *See id.,* ¶ 23(a-j).

B. Because the Annex was not a Post Office Being Discontinued, an "Administrative Record" was not Required

The Postal Service has consistently maintained that relocation of the Annex operations is outside the scope of 39 U.S.C. § 404(d) because that section only applies to Postal Service determinations to discontinue a Post Office and the Annex was neither a Post Office nor was it discontinued. *See, e.g.*, Motion to Dismiss at 3-6 and n.5. As the Declaration confirms, the Annex provided no retail services but was merely a mail sorting and delivery facility—subsequently relocated to the new Topeka S&DC—with a Dutch-door operation, correlated to its mail processing and delivery operations, for dropping-off postage-paid mail or picking-up held mail and undeliverable accountable mail—subsequently relocated to the nearby full-service Gage Center Post Office. *See* Declaration, ¶¶ 5-24. When the Postal Service decided to consolidate local mail processing and carrier routes into the newly created Topeka S&DC, those routes originating from the Annex were relocated, leaving no mail sorting or delivery operations at the Annex. The Dutch-door operations, which were collateral to the Annex mail processing operations, were likewise relocated. *See* Declaration, ¶¶ 10, 21. Because the decision to relocate the Annex's mail sorting and delivery operations—its only operations—did not involve discontinuance of a Post Office within the scope of 39 U.S.C.

§ 404(d), the Postal Service was not obliged to, and did not, prepare an administrative record of the type that would be expected pursuant to 39 C.F.R 241.3 and Handbook PO-101 had the decision involved discontinuance of a Post Office.

The foregoing observation notwithstanding, in response to Order Nos. 6681 and 6732, the Postal Service has assembled materials related to relocating the Annex operations. Public materials are attached hereto under Tab B, while nonpublic materials are being filed separately under seal.[1]

C. The Decision to Relocate Annex Operations is not Appealable

The Commission's authority to hear appeals of Post Office discontinuance decisions is prescribed by 39 U.S.C. § 404(d)(5) and is limited to appeals of a Postal Service determination to discontinue Post Offices brought by someone who had been served by that Post Office:

> A determination of the Postal Service to close or consolidate any post office may be appealed by any person served by such office to the Postal Regulatory Commission within 30 days after such determination is made available to such person under paragraph (3).

39 U.S.C. § 404(d)(5).

Indeed, 39 U.S.C. § 404 clearly distinguishes between post offices, the discontinuation of which are subject to specified administrative procedures and appeal, and other postal facilities, which are not. Thus, while 39 U.S.C. § 404(a)(3) recognizes the Postal Service's power "to determine the need for *post offices, postal* and training *facilities* and equipment, and to provide for such *offices, facilities*, and equipment as it

[1] Some of these materials contain personally identifying information (PII) that has been redacted in both the public disclosure and the sealed versions as this information is not directly relevant to the Commission's review, and because redaction of PII moreover promotes protection of personal privacy.

determines are needed[,]" only the decision to discontinue a post office is subject to appeal under 39 U.S.C. § 404(d)(5): "A determination of the Postal Service *to close or consolidate any post office* may be appealed …" *Compare* 39 U.S.C. § 404(a)(3) *with* 404(d)(5) (emphasis added). Congress's recognition of the Postal Service's authority to determine the need for post offices as well as postal facilities and its limitation of appeals expressly to decisions to discontinue post offices as distinct from postal facilities clearly demonstrates that decisions to discontinue postal facilities are not subject to appeal.

Courts that have considered the scope of section 404(d) have also concluded that it applies only to the discontinuance of post offices and not to the relocation of sorting and processing operations. *See, e.g.*, *Knapp v. USPS*, 449 F. Supp. 158, 161-62 (E.D. Mich. 1978)(observing that section 404(d) was clearly intended to deal with the physical closure or consolidation of Post Offices and concluding that the transfer of bulk mail sorting operations did not constitute a closing or consolidation necessitating the administrative procedures identified in section 404(d)); *Wilson v. USPS*, 441 F. Supp. 803, 805-6 (C.D. Cal. 1977)(concluding that section 404(d) was intended to mitigate potential effects on communities that may arise when Post Offices are closed or consolidated and holding that relocating mail processing operations was an internal management decision and not a consolidation within the scope of section 404(d)); *see also*, Docket No. A2003-1, Order Dismissing Appeal on Jurisdictional Grounds, Dec. 3, 2003, at 5 (Order No. 1387)("[T]he Commission finds that the available facts support a conclusion that the Postal Service's actions regarding the Birmingham Green facility — whether considered as a "closing" or a "suspension" — affect a "station or branch" within the service area administered by the

Birmingham post office, and thus do not fall within the ambit of the review process provided in 39 U.S.C. § 404[(d)]").

Furthermore, the Commission has consistently affirmed that the relocation of retail services within a community does not constitute a discontinuance within the scope of section 404(d). *See, e.g.*, Docket No. A2017-1, Order Granting Motion to Dismiss, June 15, 2017 (Order No. 3963); Docket No. A82-10, Order Dismissing Docket No. A82-10, Jun. 25, 1982 (Order No. 436). Thus, even were the Annex's Dutch-door operation deemed to be a retail service within the scope of section 404(d)—which it is not—that operation was simply relocated within the community and hence would still not be appealable under 39 U.S.C. § 404(d)(5), which applies only to discontinuances.

In Order No. 6681 and Order No. 6732, the Commission found that there is a factual question as to whether retail services were offered at the Annex. Order No. 6681 at 10; Order No. 6732 at 10 ("If the Sherwood Carrier Annex was not a retail facility, then the Commission lacks jurisdiction to hear an appeal of the Postal Service's determination to close it, and the appeal would be dismissed with prejudice"). As the Declaration confirms, the Annex provided no retail services but was merely a mail sorting and delivery facility—subsequently relocated to the new Topeka S&DC—with a Dutch-door operation, correlated to its mail processing and delivery operations, for dropping-off postage-paid mail or picking-up held mail and undeliverable accountable mail—subsequently relocated to the nearby full-service Gage Center Post Office. *See supra* Part A; Declaration, ¶¶ 5-8, 20-21.

Because the decision to relocate the Annex operations was not "[a] determination by the Postal Service to close or consolidate a post office," it is not subject to appeal

under 39 U.S.C. § 404(d)(5) and, therefore, the pending appeal of that decision is properly dismissed.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel, Global Business & Service Development

C. Dennis Southard IV
Attorney

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Washington, DC 20260-1135
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(202) 268-6284
October 23, 2023

TAB A

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

SHERWOOD CARRIER ANNEX TOPEKA, KANSAS	Docket No. A2023-2

DECLARATION OF GUY M. MOECKEL IN SUPPORT OF THE UNITED STATES POSTAL SERVICE'S RESPONSE TO ORDER NO. 6681 ON MOTION TO DISMISS
(October 23, 2023)

I, Guy M. Moeckel, do hereby declare that:

Biographical Summary

1. I am a 26 year veteran of the United States Postal Service (Postal Service), having begun my Postal Service career as a Part-Time Flexible Clerk in Hays, Kansas.

2. My current permanent position is Manager of Post Office Operations (MPOO) for the MPOO J area in the Kansas-Missouri District, which covers North-East Kansas, including Topeka.

3. Since June 10, 2023, I have been specially assigned to the Sorting and Delivery Center (S&DC) project team.

4. I am a graduate of Fort Hays State University (2009) with a degree in Health and Human Performance. I am an also a graduate of LSS yellow Belt training, Lean Six Sigma Green Belt, Management of Essentials for Field Leadership and most recently a graduate of the Managerial Leadership Program since February 27, 2023.

Sherwood Carrier Annex - Background

5. The Sherwood Carrier Annex (Sherwood) was opened in 1994 as a mail carrier dispatch point to address the growth of new carrier routes that could not be housed at their location in the Topeka Main office.

6. From the beginning, the Sherwood facility was only used to house mail carrier routes. Retail services were never provided and were never intended to be provided as the facility had no retail counter line nor Post Office box section for customers.

7. The nearest retail location to Sherwood is and remains a Contract Postal Unit located in the Hy-Vee supermarket across SW 29th Street from the Sherwood facility, a 4-minute drive or 5-minute walk.

8. At the time of their relocation into the newly established Topeka S&DC, which is located at the former location of the Topeka NorthPark P&DC at 1410 NW Gage Boulevard, Sherwood housed 14 city carrier routes and 17 rural carrier routes. All of those routes were relocated from Sherwood to the new Topeka S&DC. At the same time, we moved four back-office clerks that were also assigned to the facility.

Sherwood Carrier Annex - Services

9. As previously stated, no retail services were ever provided at Sherwood. The facility did not have a retail counter nor Post Office boxes for customers. No retail services were relocated from another Postal Service facility to Sherwood prior to August 26, 2023.

10. The facility did offer "Dutch-door" service where customers, after ringing a doorbell, could drop-off postage-paid mail and packages or pick-up held mail or undeliverable accountable mail. A true and correct photo of the facility lobby and Dutch-door is attached hereto as Attachment A. When required, the employee answering the doorbell could also collect postage due on items being picked-up. Customers could also call the facility to request delivery of held mail and re-delivery of previously attempted accountable mail.

11. There is also a "blue box" located outside the building and a mail slot in the Dutch-door lobby where customers could drop off postage-paid letters for delivery. Mail carriers could also collect postage-paid letters and packages from customers along their routes.

12. Sherwood did have a small amount of stamp stock assigned to it due to the existence of rural mail carriers who operated routes out of the facility. Rural carriers have the ability to sell an allotment of stamps on their route. Rural carriers carry stamp purchase order forms with them for customers who want to order stamps. The carrier buys the customer-ordered stamps from the facility's allotment and then delivers them to the customer and collects payment. Stamps were not sold directly to customers from Sherwood inventory.

13. Sherwood also had an established 1412 process that tracked any change of hands-on money at the facility. This process would include items such as short paid postage/postage due on mail on accountable packages or held mail picked-up at the Dutch-door or that that the carrier would have collected at point of delivery. When one of those items was discovered, an attempt to collect

postage was made by the delivering carrier from the customer and those funds would then be brought back at the end of the day and assigned as postage due funds collected. The 1412 process also accounted for stamp orders filled by the delivering carrier. The 1412 process allowed for accurate tracking of those funds.

Sherwood Carrier Annex - "Find USPS Locations" Tool

14. The listing for Sherwood in the "Find USPS Locations" tool on USPS.com includes hours for Last Collection, Lobby, and PO Box Access and identifies Call Referral, Pickup Accountable Mail, and Pickup Hold Mail as the services available at Sherwood.

15. Lobby Hours [Mon-Fri 10:00 am-4:00 pm; Sat 10:00 am-2:00; Sun. Closed] refers to the hours when the facility lobby was open. As discussed above, the lobby provided access to the Dutch-door services and the collection slot. See paragraphs 10 and 11 above.

16. Last Collection Hours [Mon-Fri 5:00 pm; Sat. 1:30 pm; Sun Closed] refers to the last time that postage paid letters dropped in lobby collection slot and outdoor Blue Box are collected. See paragraphs 10 and 11 above.

17. Post Office Box Access Hours, which mirror the Lobby Hours, appears to have been included by mistake. I do not know why Post Office Box Access Hours are listed, but I do know that there were never any Post Office Boxes located at Sherwood, nor are Post Office Boxes listed among the services identified for Sherwood.

18. The entries for Pickup Accountable Mail and Pickup Hold Mail refer to the Dutch-door service where customers could pick up undeliverable accountable mail and held mail. See paragraph 10 above.

19. Call Referral service indicates that customers could call the facility by telephone to request delivery of Hold Mail or redelivery of Accountable Mail. Call Referral services are also available online.

Sherwood Carrier Annex – Status of Services

20. For our current status, all the mail carriers that were assigned to Sherwood are now all located at the Topeka S&DC. These carriers have the same responsibilities as they had before, but report to a different facility. There has been no change to the carrier routes that previously operated out of Sherwood except that they now operate out of the Topeka S&DC. As before, customers can still purchase postage stamps from their rural mail carriers, who can also collect postage-paid letters and packages.

21. Hold Mail and Notified/Accountable packages or mail that would previously have been picked-up at Sherwood are now available to be picked up at the Gage Post Office. Call Referral service is now handled out of the Gage Post Office. This location is approximately 4 miles from Sherwood. The Gage Post Office is a full retail unit where they have a wide variety of services offered to the customers. At this location customers work with a retail associate that helps them identify their shipping requirements/needs as well as the most effective and cost-efficient processes. Customers at the Gage Post Office can

also purchase postage stamps and can receive Post Office Box service, services that were not offered at Sherwood.

22. It is my understanding that the Blue Box will remain at Sherwood for collection of postage-paid mail.

Catherine Crawford's Declaration

23. Ms. Crawford's declaration in this case describes ten duties she performed at Sherwood. Those duties are addressed below:

a. Cash Drawer and Form 1412 - Sherwood was assigned a cash drawer for the purpose of reporting income from postage due collections as well as possible stamp sales to our rural carriers to be provided to their customers. These items, when received, were tracked and entered into the daily finance worksheet known as the Form 1412. See paragraphs 12 and 13 above.

b. Stamps by Fax Orders – Customers could order stamps by sending a fax to Sherwood. Because Sherwood did not sell stamps other than through its mail carriers as describe above, any stamps by fax orders that were received at the facility were sent to the Topeka Main office to be filled and then mailed to customers for delivery by their mail carriers. Stamp by fax orders were not filled out of the Sherwood Dutch-door.

c. Postage Due Collection – As explained above, postage due was collected, when necessary, on accountable packages and held mail picked-up at the Sherwood Dutch-door. See paragraph 13 above.

d. Business Reply Mail accounts - Business Reply Mail is mail that is paid for, not by the mailer, but by a business account pursuant to a permit issued by the Postal Service. Business Reply Mail is accounted daily and pieces billed to the appropriate accounts as they do not require postage to be paid for by the mailer. Business Reply Mail was also assigned to the Topeka Main Post office to be filled. Business reply mail requires an assigned account, but those accounts were assigned out of the Topeka Main office or the Topeka S&DC. Any accounts that had addresses in Sherwood would be billed out of one of the other facilities and then handed to the carrier for delivery to that business. These accounts are assigned to the Topeka S&DC and are processed through that site because they would have to have a business reply account established with the Postal Service.

e. Dropped-off Packages - As explained above, items that were presented at the Dutch-door, such as packages, could be accepted as long as postage was affixed to the package since Sherwood did not sell postage. See paragraphs 10 and 12 above. Customers could also leave these packages at their residence and request a carrier pickup from that location. That service is always provided by mail carriers.

f. Package Pick-up – As explained above, undeliverable accountable mail could be picked-up from the Sherwood Dutch-door. See paragraph 10 above.

g. Second Notices – Addressees of undeliverable accountable mail that was not picked-up within a specified time period were sent follow-up notices (i.e., second notices) reminding them that their mail was being held for pick-up. A list of these items is generated through our internal tracking program that tracks items that have not been delivered or picked up that we have notified and put on our shelf at the facility for re-delivery and printed off each day and provided to the mail carriers with redelivery instructions and also includes any carrier package pick-up requests.

h. Held Mail Pick up - As explained above, held mail could be picked-up from the Sherwood Dutch-door. See paragraph 10 above.

i. Answered the Telephone – Customers could telephone Sherwood and, where possible, clerks would provide answers to customer questions. It is unclear what Ms. Crawford means by "looking up change of address" as address change requests could not be processed over a phone conversation as that information is protected for our customers. Customer inquiries or call referrals are also provided through our 1-800-ASK-USPS line and customer inquiries previously handled at Sherwood are now handled at the Gage Post Office or the Topeka S&DC.

j. Dutch-door Volume – In conjunction with preparing this Declaration, I reviewed the scanning log of items dropped-of at or picked-up from the Sherwood Dutch-door for the period between and including August 4, 2023, and August 25, 2023—19 business days (Sherwood was

not open on Sunday). During that time frame there were a total of 960 mail-pieces dropped-off or picked-up at the Sherwood Dutch-door—approximately 50 pieces per day—of which 192 mail-pieces were picked-up by customers and 768 pieces were dropped-off and accepted with prepaid postage.

Sherwood Carrier Annex - Conclusion

24. In conclusion, Sherwood Carrier Annex was never established as a retail location for the Postal Service and the services that we did provide are still services that our customers can get at any other location within the community.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 21, 2023.

Guy M. Moeckel

NO POSTAGE
SOLD HERE
WINDOW SERVICE #1:
FOR ASSISTANCE
PLEASE RING
BUZZER

TAB B

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

SHERWOOD CARRIER ANNEX TOPEKA, KANSAS	Docket No. A2023-2

SHERWOOD CARRIER ANNEX ADMINISTRATIVE RECORD IN RESPONSE TO ORDER NO. 6681 ON MOTION TO DISMISS AND ORDER NO. 6732 ON SUPPLEMENTAL MOTION TO DISMISS
(October 23, 2023)

Item #	Description
1	Collected Information and Data[*]
2	Pictures
3	10-Year Net Operating Variance[*]
4	Employee Notifications[*#]
5	Carrier Notifications[*#]
6	Elected Officials Notifications[#]
7	Dutch-door Log (May 4, 2023-May 16, 2023)[*#]
8	(Exemplar) Daily Financial Report – Form 1412 (May 11, 2023)[*#]
9	(Exemplar) Stamp Stock Transactions and Daily Recap – Form 3959 (Feb. 4, 2023; Apr. 11, 2023); Stamp Invoice Report (Jan. 23, 2023; April 3, 2023)[*#]
10	Notice

[*] Filed under seal.
[#] Personally identifiable information redacted.

2

NO POSTAGE
SOLD HERE
WINDOW SERVICE AT:
FOR ASSISTANCE
PLEASE RING
BUZZER

NO POST
SOLD HE

6

From:	Gordon, Michael J - Washington, DC
To:	Womack, Bill; [redacted]; [redacted]; Stephenson, Mark (COR); VanNess, Ethan
Subject:	FYI -- 8 S&DCs opening soon
Date:	Wednesday, May 31, 2023 12:16:00 PM

Committee staff,

Eight new Sorting and Delivery Centers will be opening in a few days in the locations below. We are sending notifications to the Members representing those updated facilities with the message copied below. Let me know if you have any questions.

Owensboro, KY – Rep. Guthrie
Williamsport, PA – Rep. G. Thompson
Kokomo, IN – Rep. Spartz
Pasco, WA – Rep. Newhouse
Annapolis, MD – Rep. Sarbanes
Hanover Park, IL – Rep. Ramirez
Golden, CO – Rep. Pettersen
Topeka, KS – Rep. LaTurner

The Postal Service is making major improvements to its network, and I am writing today because these changes will positively impact your district and the state of XXXXX.

As the Postal Service implements the Delivering for America plan, one of its many initiatives is the creation of Sorting and Delivery Centers (S&DCs). These facilities will deploy investment to centralize delivery operations across a given area, allowing us to optimize equipment operations, reduce excess truck transportation, improve efficiencies, and provide an updated working environment for our employees. The S&DC optimization concept was unveiled in the fall of 2022, and as we begin to pilot a number of operations, we expect to see improvements as we implement.

The S&DCs will allow us to position the Postal Service for success as follows:

- Most S&DCs will utilize existing postal-owned buildings where significant upgrades will be implemented, in many cases also accomplishing deferred maintenance.
- The centers, along with improvements to our product offerings, will allow us to expand a business customer's local, regional, and nationwide market reach from a single nearby drop location in shortened time intervals; in many cases same-day or next-day.
- The Centers will enable electric vehicle deployment by concentrating EVs where electricity and facility infrastructure leads to feasibility.
- Installation of new package sortation equipment to improve the flow of both mail and packages, which is essential to our financial and operational future.
- Greatly improving employee morale by providing modern and inviting workspaces.
- By centralizing delivery operations, we will be able to substantially reduce costly and underutilized truck trips from our processing plants and achieve both financial and environmental goals.

While this investment is a major undertaking, these changes will be behind-the-scenes and the typical postal customer will be completely unaware they are happening at the delivery point. For our employees, we will be changing the sites where postal carriers begin and end their routes to these more centralized locations. Specifically, we will be establishing an S&DC at XXXXX, XX.

Any movement of employees will be done in accordance with the respective collective bargaining agreement. Any changes made to our carriers will not affect our retail operations and customers who visit physical Post Offices/retail locations will not be impacted.

This change will allow for us to more efficiently serve our customers and your constituents, and if you would like to discuss the plans, do not hesitate to reach out to me.

Michael J. Gordon
Director, Government Liaison
Government Relations and Public Policy
U.S. Postal Service Headquarters
(202) 268-6027 office | (202) 738-0655 cell
[redacted]
www.usps.com/gr

From: Reedy, James D - Washington, DC
To: Gordon, Michael J - Washington, DC
Subject: FW: USPS: New Local Sorting and Delivery Center
Date: Monday, September 25, 2023 11:32:22 AM

Moran and Marshall

Bcc, but the recipients were:

[redacted]

Reasor, Christiana (Moran) [redacted]

James D. Reedy
Government Relations Representative
Office of Government Relations and Public Policy
U.S. Postal Service Headquarters
475 L'Enfant Plaza SW, Washington, DC 20260
[redacted] | 202-573-4766

From: Reedy, James D - Washington, DC
Sent: Wednesday, May 31, 2023 2:49 PM
Subject: USPS: New Local Sorting and Delivery Center

Hello,

The Postal Service is making major improvements to its network, and I am writing today because these changes will positively impact your district and the state of Kansas.

As the Postal Service implements the Delivering for America plan, one of its many initiatives is the creation of Sorting and Delivery Centers (S&DCs). These facilities will deploy investment to centralize delivery operations across a given area, allowing us to optimize equipment operations, reduce excess truck transportation, improve efficiencies, and provide an updated working environment for our employees. The S&DC optimization concept was unveiled in the fall of 2022, and as we begin to pilot a number of operations, we expect to see improvements as we implement.

The S&DCs will allow us to position the Postal Service for success as follows:

- Most S&DCs will utilize existing postal-owned buildings where significant upgrades will be implemented, in many cases also accomplishing deferred maintenance.
- The centers, along with improvements to our product offerings, will allow us to expand a business customer's local, regional, and nationwide market reach from a single nearby drop location in shortened time intervals; in many cases same-day or next-day.
- The Centers will enable electric vehicle deployment by concentrating EVs where electricity

and facility infrastructure leads to feasibility.

- Installation of new package sortation equipment to improve the flow of both mail and packages, which is essential to our financial and operational future.
- Greatly improving employee morale by providing modern and inviting workspaces.
- By centralizing delivery operations, we will be able to substantially reduce costly and underutilized truck trips from our processing plants and achieve both financial and environmental goals.

While this investment is a major undertaking, these changes will be behind-the-scenes and the typical postal customer will be completely unaware they are happening at the delivery point. For our employees, we will be changing the sites where postal carriers begin and end their routes to these more centralized locations. Specifically, we will be establishing an S&DC in Topeka, KS.

Any movement of employees will be done in accordance with the respective collective bargaining agreement. Any changes made to our carriers will not affect our retail operations and customers who visit physical Post Offices/retail locations will not be impacted.

This change will allow for us to more efficiently serve our customers and your constituents, and if you would like to discuss the plans, do not hesitate to reach out to me at 202-573-4766.

Best,

James D. Reedy

Government Relations Representative
Office of Government Relations and Public Policy
U.S. Postal Service Headquarters
475 L'Enfant Plaza SW, Washington, DC 20260
[redacted] | 202-573-4766

From:	Reedy, James D - Washington, DC
To:	Gordon, Michael J - Washington, DC
Subject:	FW: USPS: New Local Sorting and Delivery Center
Date:	Monday, September 25, 2023 11:29:51 AM

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James D. Reedy
Government Relations Representative
Office of Government Relations and Public Policy
U.S. Postal Service Headquarters
475 L'Enfant Plaza SW, Washington, DC 20260
[redacted] | 202-573-4766

From: Reedy, James D - Washington, DC
Sent: Wednesday, May 31, 2023 2:36 PM
To: Kahrs, Jeff <[redacted]>
Cc: Middlebrooks, Jake <[redacted]>
Subject: USPS: New Local Sorting and Delivery Center

Hi Jeff,

The Postal Service is making major improvements to its network, and I am writing today because these changes will positively impact your district and the state of Kansas.

As the Postal Service implements the Delivering for America plan, one of its many initiatives is the creation of Sorting and Delivery Centers (S&DCs). These facilities will deploy investment to centralize delivery operations across a given area, allowing us to optimize equipment operations, reduce excess truck transportation, improve efficiencies, and provide an updated working environment for our employees. The S&DC optimization concept was unveiled in the fall of 2022, and as we begin to pilot a number of operations, we expect to see improvements as we implement.

The S&DCs will allow us to position the Postal Service for success as follows:

- Most S&DCs will utilize existing postal-owned buildings where significant upgrades will be implemented, in many cases also accomplishing deferred maintenance.
- The centers, along with improvements to our product offerings, will allow us to expand a business customer's local, regional, and nationwide market reach from a single nearby drop location in shortened time intervals; in many cases same-day or next-day.
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Best,

James D. Reedy
Government Relations Representative
Office of Government Relations and Public Policy
U.S. Postal Service Headquarters
475 L'Enfant Plaza SW, Washington, DC 20260
[redacted] | 202-573-4766

From: Slusher, Scott R - Washington, DC
To: Gordon, Michael J - Washington, DC
Subject: FW: FYI June S&DCs
Date: Monday, September 25, 2023 10:28:05 AM

From: Slusher, Scott R - Washington, DC
Sent: Thursday, June 1, 2023 5:26 PM
To: Christensen, Annika (HSGAC) <[redacted]>; Hopkins, Andrew (HSGAC) <[redacted]>
Subject: FYI June S&DCs

Andrew and Annika – As you know, the Postal Service is making major improvements to its network, and I am writing today to provide our latest update.

As the Postal Service implements the Delivering for America plan, one of its many initiatives is the creation of Sorting and Delivery Centers (S&DCs). These facilities will deploy investment to centralize delivery operations across a given area, allowing us to optimize equipment operations, reduce excess truck transportation, improve efficiencies, and provide an updated working environment for our employees. The S&DC optimization concept was unveiled in the fall of 2022, and as we begin to pilot a number of operations, we expect to see improvements as we implement.

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While this investment is a major undertaking, these changes will be behind-the-scenes and the typical postal customer will be completely unaware they are happening at the delivery point. For our employees, we will be changing the sites where postal carriers begin and end their routes to these more centralized locations. Specifically, we will be establishing an S&DCs in June at the following sites:

Facility Name	Address	City	State
OWENSBORO - DDC	**54 BON HARBOR HLS**	**OWENSBORO**	**KY**
WILLIAMSPORT - P&DF	**2901 REACH RD**	**WILLIAMSPORT**	**PA**
KOKOMO - P&DF	**2719 S WEBSTER ST**	**KOKOMO**	**IN**

PASCO - P&DF	**3500 W COURT ST**	**PASCO**	**WA**
ANNAPOLIS - CAX	**210 ADMIRAL COCHRANE DR**	**ANNAPOLIS**	**MD**
BARTLETT/HANOVER PK - CARRIER ANNEX	**2670 W LAKE ST**	**HANOVER PARK**	**IL**
GOLDEN - MAIN OFFICE	**1100 JOHNSON RD**	**GOLDEN**	**CO**
TOPEKA - Northpark	**1410 NW GAGE BLVD**	**TOPEKA**	**KS**

Any movement of employees will be done in accordance with the respective collective bargaining agreement. Any changes made to our carriers will not affect our retail operations and customers who visit physical Post Offices/retail locations will not be impacted.

This change will allow for us to more efficiently serve our customers and your constituents, and if you would like to discuss the plans, do not hesitate to reach out to me,

Thanks, Scott

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Public NOTICE

July 17, 2023

Effective Saturday, August 26, 2023 – All Mail Picked Up at the following Post Office will be relocated:

Sherwood Carrier Annex

All Mail will be available for customer pickup at the following Post Office:

Gage Center Post Office

1430 SW Woodhull St.
Topeka, KS 66604
(785) 272-0002

Post Office Hours
Monday – Friday: 8am – 5pm
Saturday: 9am – 12pm

*Please ensure you bring government-issued identification to pick-up mail

For more information about postal products and services, contact 1-800-ASK-USPS or visit *www.usps.com*.