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The Honorable Barbara Mikulski
Chair
Committee on Appropriations
Washington, DC 20510

The Honorable Tom Udall
Chair
Appropriations Subcommittee
Financial Services and General Government
Washington DC 20510

The Honorable Richard Shelby
Ranking Member
Committee on Appropriations
Washington, DC 20510

The Honorable Mike Johanns
Ranking Member
Appropriations Subcommittee
Financial Services and General Government
Washington, DC 20510

December 3, 2014

**Deny USPS Funding for piecemeal closures:
Comprehensive Postal Reform is essential for USPS' Future**

Dear Chair Mikulski, Ranking Member Shelby, Subcommittee Chair Udall and
Subcommittee Ranking Member Johanns:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition of more than 200 national organizations committed to the protection and advancement of civil and human rights, we write to you with concerns regarding planned changes at the United States Postal Service (USPS). In the absence of comprehensive Congressional reform legislation, we urge you to include language in any omnibus appropriations legislation or continuing resolution that would prevent the USPS from closing or consolidating any more area mail processing facilities during Fiscal Year 2015.

The Leadership Conference believes that changes to the USPS without sufficient study and consideration will have dire consequences for both workers and communities. Although a number of reform proposals have been introduced in both the House and the Senate, no comprehensive legislation has yet been enacted. In the absence of Congressional legislation, the Postal Service has proposed sweeping changes in its operation—changes we believe will have a significant, detrimental impact on workers in both urban and rural communities and in communities of color.

Since 2012, the Postal Service has consolidated 141 mail processing facilities. The Postmaster General has announced that the USPS will consolidate up to 82 more mail processing facilities and eliminate up to 15,000 more jobs in 2015, directly impacting 37 states. In addition to the significant effect on jobs, these consolidations will slow down service delivery, impacting seniors, businesses, and local communities.

Because the USPS is located in both urban and rural areas nationwide, it serves as an important employer in these communities and a potential lifeline to other essential services, particularly for African American and Latino households. The Postal Service currently

enjoys a positive image for its service. A recent Gallup poll found that Americans rated the Postal Service highest among 13 major federal agencies.¹ The study indicates that, based on the increasing use of e-commerce, there is likely to be a future benefit for the Postal Service in both image and financial performance.² Moreover, according to a YouGov/Huffington Post survey conducted earlier this year, the USPS enjoys a high level of favorability among people of color.³ In fact, this survey found high support among communities of color for a recent proposal to have the USPS provide basic banking services, such as bill paying, check cashing, and small loans, to people who are currently not being reached by banks or credit unions.⁴ Rather than rushing to shrink an institution which is effective, highly valued, and has a significant positive impact on communities of color, the USPS should explore new and expanded offerings of services to the community.

Because of the significant impact that cuts or changes in service will have on communities across the country, we are concerned about changes made without sufficient consideration, consultation with the community, and impact studies. The USPS's own public disclosure and transparency requirements related to Area Mail Processing Guidelines require that an area mail processing feasibility study "evaluate service standard impacts for all classes of mail" and "consider issues important to local customers."⁵ The guidelines additionally require a) adequate public notice be provided to communities affected; b) information be made available about service changes in the affected communities, c) the effect on customers or Postal Service employees and any cost savings be studied; d) affected individuals be provided the opportunity to provide input on the proposed decision; and e) public comments be taken into account in making a final decision.⁶

In October, the USPS Office of the Inspector General (IG) found that the USPS failed to fulfil its regulatory and statutory obligations to adequately study the impact of these consolidations on service standards or to inform the public of these impacts.⁷

We believe it is crucial that any mail processing consolidations at the USPS be delayed until feasibility studies are completed and adequate time for public comment and subsequent consideration of those comments has been provided. As part of any reform legislation, we ask that you require an independent assessment of the impact than any postal network consolidation will have on communities of color. Such an assessment should include recommendations to the Postal Service on steps it can take to mitigate the effects of consolidation on unemployment.

Because of the threat to many communities of the USPS consolidating offices and limiting service, potentially pushing individuals to private sources, we urge you to include language in any omnibus

¹ Gallup Poll, Nov. 11-12 2014, at <http://www.gallup.com/poll/179519/americans-rate-postal-service-highest-major-agencies.aspx> (survey of 1,020 adults).

² Id.

³ YouGov, Poll Results: Post Office Bank, Feb. 7-9, 2014, at <https://today.yougov.com/news/2014/02/10/poll-results-post-office-bank/> (survey of 1,000 adults; see full tables and demographic crossbreaks at 7).

⁴ Id.

⁵ United States Postal Service Handbook PO-408, Area Mail Processing Guidelines (March 2008)

⁶ Id.

⁷ Memorandum from Robert J. Batta, Deputy Assistant Inspector General for Mission Operations, Office of Inspector General, United States Postal Service to David E. Williams, Jr., Vice President, Network Operations, United States Postal Service, Management Alert – Lack of Service Standard Change Information in Area Mail Processing Feasibility Studies (Oct. 6, 2014) (NO-MA-15-001)



appropriations legislation or continuing resolution to ensure a moratorium on service standard changes and processing plant closings during Fiscal Year 2015. In addition, we ask that you include language to maintain and comply with service standards for First-Class Mail and periodicals effective on July 1, 2012. This one year moratorium will give Congress the time it needs to enact the comprehensive postal reforms that are necessary for the USPS to function effectively into the future.

Thank you for your consideration of our views. If you have any questions, please contact either of us, or Legal Director and Senior Legal Advisor Lisa Bornstein at Bornstein@civilrights.org or (202) 466-3311.

Sincerely,



Wade Henderson
President & CEO



Nancy Zirkin
Executive Vice President