

JOAQUIN CASTRO  
20TH DISTRICT, TEXAS

HOUSE PERMANENT SELECT  
COMMITTEE ON INTELLIGENCE  
  
COMMITTEE ON FOREIGN AFFAIRS

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-4320

WASHINGTON OFFICE:  
2241 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
TEL: (202) 225-3236  
FAX: (202) 225-1915  
  
DISTRICT OFFICE:  
727 E. CESAR E. CHAVEZ BOULEVARD  
SUITE B-128  
SAN ANTONIO, TX 78206  
TEL: (210) 948-8216  
FAX: (210) 979-0737

Robert D. Carr  
Postmaster  
United States Postal Service, San Antonio  
1 Post Office Drive  
San Antonio, Texas 78284

September 29<sup>th</sup>, 2023

Dear Mr. Carr,

I am writing on behalf of my constituents in the 20<sup>th</sup> District of Texas about apparent changes to USPS policy on cluster box repair and replacement that are negatively affecting mail delivery in San Antonio.

For years, my constituents have been able to count on USPS to maintain and replace neighborhood cluster boxes. However, in recent months, USPS has newly claimed that box maintenance is a neighborhood responsibility and refused to provide longstanding repair services. Many older neighborhoods are adversely affected because both USPS and Homeowner Associations (HOA) may not have properly stored agreements that determine service relationships between the two entities. This change in policy was made without timely notification or explanation to many neighborhood HOAs.

In 2012, USPS implemented new policies to create more efficient mail delivery routes. According to the USPS's *National Delivery Planning Standards: A Guide for Builders and Developers*, USPS prefers (and often requires) newly built neighborhoods to have centralized delivery boxes.<sup>1</sup> According to section 631.24 of the *Postal Operations Manual*, newly established residential customers, such as a developer or an HOA, must request and receive approval for the centralized delivery location and mode of delivery from the local postmaster.<sup>2</sup> Though the manual outlines requirements for newly built neighborhoods, it does not offer guidance for neighborhoods that were built prior to 2012.

According to USPS staff, USPS and neighborhood developers typically sign agreements to establish a mode of delivery and to determine which party is responsible for maintaining and replacing cluster boxes. The HOA for Oakmont Downs, a San Antonio neighborhood established

---

<sup>1</sup> United States Postal Service. (n.d.). Operations Developers and Builders Guide (Publication No. USPS-STD-4C). Retrieved from <https://about.usps.com/what-we-are-doing/current-initiatives/delivery-growth-management/operations-developers-and-builders-guide.pdf>

<sup>2</sup> United States Postal Service. (2018, July 19). USPS - Postal Bulletin - Updates to Postal Services - Residential Mailbox Standardization: Update 002. Retrieved from [https://about.usps.com/postal-bulletin/2018/pb22492/html/updt\\_002.htm](https://about.usps.com/postal-bulletin/2018/pb22492/html/updt_002.htm)

in 1993, does not have a record of this agreement and the government liaison for USPS indicated they were not able to locate the agreement either. Because USPS consistently provided cluster box maintenance, the Oakmont Downs HOA and other HOAs fairly concluded that USPS is responsible for the boxes. Absent an agreement that clearly determines ownership of a cluster box between the USPS and an HOA for which USPS has historically maintained their cluster boxes, the USPS should continue to fully service, replace, and repair cluster boxes for these HOAs.

The Oakmont Downs HOA states that the Cedar Elm post office has provided new residents with keys to their cluster boxes over many years, which is in line with stated USPS policy. According to USPS, the Postal Service is responsible for providing customers with a lock and key to their postal-owned cluster box.<sup>3</sup> These actions by USPS reinforced Oakmont Downs' fair belief that USPS owns and is responsible for their neighborhood's cluster boxes.

In December 2022, the Oakmont Downs HOA requested that USPS repair a box that was damaged in an act of vandalism. After multiple unanswered requests and without warning, the Cedar Elm post office told my constituents that the HOA is responsible for maintaining and replacing their cluster boxes.

I am concerned that as USPS updates policies to lower operating costs, these new policies negatively impact mail delivery. I understand that USPS must update its operating procedures from time to time, but I am worried that these shifts in policy implementation are placing an undue burden on my constituents.

My office has placed several requests to meet with your office to discuss how USPS in San Antonio handles and implements its cluster box policies but has not received a satisfactory response. Please reach out to Ishmael Abuabara ([Ishmael.Abuabara@mail.house.gov](mailto:Ishmael.Abuabara@mail.house.gov)) and Rose Ann Maldonado ([Roseann.Maldonado@mail.house.gov](mailto:Roseann.Maldonado@mail.house.gov)) to set up a meeting with your office to discuss our concerns.

Sincerely,

A handwritten signature in black ink that reads "Joaquin Castro". The signature is written in a cursive, slightly slanted style.

Joaquin Castro  
Member of Congress

---

<sup>3</sup> United States Postal Service. (n.d.). Locked Mailboxes and Mailbox Keys. Frequently Asked Questions. Retrieved from <https://faq.usps.com/s/article/Locked-Mailboxes-and-Mailbox-Keys>