

# Address Change Service



Concerns and Recommendations  
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Goal of the presentation is to briefly (within 20-30 minutes) outline the concerns and recommendations related to ACS to the USPS.



## Importance of ACS to the Industry

- Essential Move Update compliant method
  - Primarily for mailers that cannot use NCOALink® or a pre-mailing method
- Leveraged as a best practice in address quality when used with NCOALink
- Tangible value proposition for IM™ BC Full Service
- Mailers want to leverage ACS™, but there are still significant barriers to effective use

Emphasize that ACS is important to the industry. For some mailers, ACS is their ONLY option. Periodical mailers, it is required.

ACS is also a best practice when combined with a pre-mailing solution like NCOALink. This was outlined in MTAC workgroup 97.

“Free” Full Service ACS is the ONLY tangible value proposition right now for IMb early adopters.

MTAC workgroup 121 identified barriers to ACS use and these barriers as well as others discussed in this presentation continue to exist.



## Terms and Definition

- ACS™ for this presentation include
  - Traditional ACS
  - OneCode ACS
  - Full Service ACS
- ACS notices include
  - COA - new address, MLNA, BCNA, Foreign, Temporary
  - NIXIE - non COA reasons
- ACS notices are generated via multiple sources
  - PARS Intercept (Letters Only)
  - CFS
  - Carrier Identified

For this presentation, unless specifically called out separately, ACS will mean all versions of the ACS service.

Industry also recognizes that ACS notices and data may be addressee originated change of addresses, USPS initiated change of addresses (such as Moved Left No Address and Closed PO Boxes), address changes for someone leaving the country, and temporary address changes. We also recognize that NIXIES, non-change of addresses, is data provided by the USPS.

Industry recognizes that the ACS data is captured via many sources, including Postal Automation Redirection System for letters only, Computerized Forwarding System for flats and non-automation letters, and USPS carrier force knowledge.



## Shared Views of Mailing Industry

- Association for Postal Commerce
- IDEAlliance
  - Fulfillment Operations Group
  - Mailing Software Development Group
- Major Mailers Association
- Association for Mail Electronic Enhancement
- Mailing Fulfillment Service Association
- Direct Marketing Association
- Magazine Publishers of America
- American Business Media
- National Association of Presort Mailers

The concerns and recommendations expressed in this presentation come from many industry stakeholders. This slide reflects just some of the associations that had a role in preparing today's presentation.



## Areas of Concern

- Data Quality / Technology Barriers
- Data Distribution and File Formats
- MID Management and ACS™ Support
- Communication and Change Management
- Business Rules and Legal Restraints

Industry concerns related to ACS can be grouped into five categories:

- 1) Data quality and technological barriers
- 2) Data distribution and file formats
- 3) Mailer ID management and general support for ACS
- 4) Communication and change management specifically related to ACS
- 5) Business Rules (both USPS and industry) as well as Legal Restraints



## Data Quality Concerns

- Inconsistent data return for the same name/address for consecutive mailings
- Missing and Incorrect data
- Some ACS™ returned addresses cannot DPV® confirm
- Technological barriers
  - Consistent and correct data capture (i.e. letters processed on flat equipment)
- Erroneous address correction fee charges
  - Duplicate charges within and across various ACS products and services
  - Charges for temporary changes
  - “Free ACS” is not free

In the category of data quality, industry has several serious concerns.

- 1) We are seeing significant issues related to inconsistent data being returned for the same name and address across consecutive mailings. This is causing many mailers to question the integrity of the data and the ACS system.
- 2) Industry is seeing missing and incorrect data in the return files. Again, this is calling into question the integrity of the overall system.
- 3) Some ACS provided addresses cannot DPV confirm. This is not only an issue of data integrity, but it also results in a loss of postage. If the old address had a ZIP+4 and now it's been dropped, that costs the industry.
- 4) There are technological barriers as well, which results in inconsistent and flawed data capture. For example, letters processed on flat equipment.
- 5) Finally, industry is very concerned with billing issues we are seeing. There are duplicate charges, charges for temporary COA's which are basically worthless to many mailers, and incorrect charges. In short, the “free” isn't really free for Full Service ACS.



## Recommendations for Data Quality

- Need for improvement in the USPS database
  - Support for University, Military, Colleges
  - Broader support for alias addresses
  - Consistent approach to data capture and dissemination
- Alignment of DPV<sup>®</sup> and other databases
- Implement a consistent, centralized, and accurate billing approach

Our recommendations:

- 1) Improve the USPS data. Expand the support for universities, colleges, and military
- 2) Provide a broader support for alias addresses, including cities and streets.
- 3) Provide a consistent approach to capturing and disseminating the data.
- 4) Align DPV and all the other data sets (such as ZIP+4, LACSLink, SuiteLink, and NCOALink) to improve continuity in matching.
- 5) Implement a consistent, centralized, and accurate billing approach. The current system is broken, and costing mailers thousands of dollars.



## Data Distribution and Format

- Different File formats for FF MUN, Traditional ACS™, OneCode ACS®, Full Service ACS [COA and Nixies]
  - Costly to develop and maintain
  - Inconsistent handling results in unexpected data returns
- USPS organizational “silos” complicate data distribution for their customers
  - MID assignment from NCSC assumes Full Service
  - Automation and Non-automation forces mixed ACS methodologies and multiple MIDs
- By/For relationship and billing issues
- Data must be “pulled” instead of “pushed”

There are a number of concerns related to data distribution.

- 1) The file formats for the various ACS products and related data sets are all different. This is likely the result of USPS silos. Developing and maintaining systems to handle these multiple formats is costly to the industry and can result in errors.
- 2) The USPS legacy systems for ACS are still viewed as silos. This complicates the use of ACS, confuses the industry, and presents a barrier for adoption and usage.
- 3) The By/For relationship doesn't support all the various billing and data steward relationships within the industry. This was specifically called out in MTAC workgroup 121.
- 4) Industry still needs to pull the ACS related data. With such tight timeframes for Move Update compliance, expedited emphasis on a fully functional “push” technology is essential.





## Recommendations for Data Distribution and Format

- ACS™ and related systems should have a single format
  - A change control group should be established
- The XML messaging system to push ACS files needs to be completed
- The “cast of characters” by/for relationship needs to consider the expanded industry needs for accurate billing and data stewardship
- Decouple MID and ACS STID codes

Our recommendations include:

- 1) Having a single format for data distribution regardless of the version of ACS involved.
- 2) The XML based messaging to push ACS data must be completed.
- 3) The cast of characters reflecting the by/for relationship should be expanded to support all industry value chains
- 4) The MID and ACS service type codes need to be decoupled. This will not only reduce the number of MID assigned, but also allow more flexibility for industry use of ACS.



## MID Management and ACS™ Support

- MID assignment and management is complicated between NCSC and BMEU
- No centralized support for MID management or ACS related issues
  - USPS silos (IMb versus traditional) complicate answers, contradict each other, and confuse customers
- Data privacy concerns related to MID
  - Changes to MID services without consent
  - Providing MID ownership without consent

MID assignment and management has reached a level of extreme complexity. The industry is confused who to contact for help – NCSC or their local BMEU.

There is also conflicting answers related to MID assignment and use. We believe this is a direct result of USPS legacy systems and a silo approach.

There are also serious concerns about data privacy with MID information. Some mailers are reporting changes to MID related services without their knowledge or consent. There are also situations where information about an MID owner is being provided by the USPS without the MID owner's consent.



## Recommendations for MID Management and ACS™ Support

- NCSC should be the single source for ACS and MID related management and support for ACS
- MID privacy and security must be implemented
  - Should treat MIDs in the same secure manner as a permit # or a CAPS account

Our recommendation is that the NCSC be the single source for ACS and MID related management.

MID privacy needs to be enhanced. Industry believes the MID should be treated with the same level of sensitivity as a permit # or a CAPS account.



## Communication and Change Management

- Frequent changes put development efforts into costly and perpetual update cycles
- Little or no visibility into ACS™ specific roadmap changes or implementation plans
- No single source for change information
- No venue for design and future considerations

Industry has serious concerns about the rapid changes to the ACS program. There is little or no visibility into the roadmap for ACS improvement. Moreover, there isn't a venue to have a collaborative discussion between USPS and industry on improving the ACS system.



## Recommendations for Communication and Change Management

- USPS should have a single-source for communicating ACS™ changes
  - ACS specific distribution channel / list
- Clearly defined roadmaps and implementation designs should be a collaborative effort with the industry in advance
  - Early involvement of industry will help minimize costly delays and rework
  - Leveraging teleconferences, webinars, and other venues

Our recommendation is to have a single, ACS specific communication channel. This could be an e-mail distribution similar to the DMM advisory, but it would be specific to ACS and to its users and the mailing software development group.

Roadmaps and implementation designs should be created in a collaborative effort and done well in advance. A regularly scheduled venue should be established between the USPS, their ACS customers, software developers, and other industry stakeholders.



## Business Rules and Legal Restraint

- 30-day address correction requirement for STD Mail
  - Compliance is impractical for typical Standard Mail mailing cycles
  - Forces mailers to use a pre-mailing method, which may not be an option for some
- MLNA and PO Box Closed for FCM
  - These COA's are not customer supplied change-of-address notices per the DMM®
  - Clarification in an FAQ does not constitute an accepted policy change
- Foreign Addresses
  - Similar concerns as MLNA and PO Box
- Enforcement methodologies
  - Enforcement method cannot be replicated by industry

There are very real legal restraints and business rules that prevent mailers from using ACS. The USPS is making “last minute” clarifications to Move Update compliance and publishing these in an FAQ or an advisory. These are not Federal Register Notices and thus the industry cannot accept these as DMM official rules.

In many cases, the industry cannot suppress or mail at a higher rate MLNA or PO Box closed addresses.

Finally, the enforcement methodology being used in Memphis cannot be replicated on the industry side. Thus, there is no way for industry to effectively calculate risk or assessment of address quality prior to acceptance.



## Recommendations for Business Rules and Legal Restraint

- Remove the MLNA and PO Box clarification, since it is not in the DMM®
- Create a consistent method for foreign moves
- USPS® should utilize FRN for changes to Move Update
- Implement a Return Service Requested as outlined in MTAC 121
- Align the STD mail compliance to 95 days per the Move Update requirement
- Use consistent data sources for adjudication and compliance

The USPS needs to file a FRN related to the MLNA and PO Box closed clarifications. These need to have industry comments and a transition period for compliance due to the legal issues related to these.

The USPS needs to have a consistent approach to handling foreign moves.

The recommendations in MTAC 121 need to be implemented, specifically Return Service Requested.

The 30-day requirement for Standard Mail and Full Service ACS is unrealistic and impractical. The USPS should change this to 95 days and align it with the Move Update requirement.

And finally, the USPS should use a consistent data source for adjudicating compliance. Currently, the Inspection Service uses PARS data, which has a different result than NCOALink used in PBV.



## Final Conclusion

- Acknowledgment and acceptance of concerns and recommendations
- Agreed approach and implementation timeline
  - Prior to January 4, 2010
- Identification of USPS® ownership and method for measuring and tracking progress

In conclusion, we are asking the USPS to acknowledge these concerns and accept these recommendations. Industry would like to discuss how we can implement these changes prior to January 4, 2010, who will be the owners of these recommendations (both USPS and industry) and what method for measuring and tracking progress will be used.