



Association for Postal Commerce

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September 16, 2009

Mr. Stephen M. Kearney
Senior Vice President, Customer Relations
U. S. Postal Service
475 L'Enfant Plaza SW Room 5014
Washington DC 20260-5014

Dear Steve,

On behalf of Board of Directors of the Association for Postal Commerce, I am writing to request a meeting with you and whomever you deem appropriate from the Postal Service's staff to discuss what we consider as significant issues regarding address correction services. We have attempted several times to pursue these issues through established channels (such as MTAC as well as direct communications with USPS program managers) but without satisfaction.

The concerns we wish to discuss surround the Postal Service's address correction services, particularly ACS. Although some of our concerns deal with address correction service provided through Intelligent Mail Barcode (IMb) Full Service, we also have concerns relative to non-IMb ACS services. Our concerns largely can be categorized into the following areas:

- Lack of clear communication from the USPS on its address correction services, policies, and requirements. Apparently, even the most sophisticated and knowledgeable service providers are struggling to educate their clients on the different address correction services and which methods should be used to obtain the data and services they need. Less sophisticated mailers and service providers are even more challenged. USPS communications have been informal, inconsistent, and in many cases, incorrect. We believe there is considerable room for substantial improvement.
- Focus must be made on improving address correction service data quality, consistent data provision across address correction services, and ensuring correct assessment of applicable postage fee charges. PostCom members are encountering significant issues with address correction services data quality and consistency, as well as erroneous address correction fee charges. Missing data, incorrect data, and inconsistencies with data returned for the same name/address for consecutive mailings, are plaguing mail owners and service providers. There also are data inconsistencies between data provided for a name/address through one address correction service and another. Different data file formats used for different address correction services also presents additional expense and time for customers. Address correction services fees/charges also are being erroneously assessed.
- The USPS needs to outline an implementation plan for changes in address correction service requirements. Every day, service providers and mail owners are learning of another change or nuance to address correction services requirements/standards that requires them to make system or process changes. The USPS needs to outline such changes in an implementation plan that allows for the changes to be batched and allows adequate time between batches. It is critical that there be a period of stability with no changes. We cannot continue to make such changes on a daily or weekly basis.

- The USPS should work to make IMb Full Service address correction data distribution processes easier for customers to use. PostCom members have expressed concern with the additional complexity in data distribution because of Postal Service organizational "silos." For example, if a Mailer ID (MID) is obtained through the NCSC in Memphis, it is assumed to be Full Service. If a mailer does not want Full Service ACS, they must "turn off" the full service MID. If multiple classes of mail share an MID, this may require a mailer to receive an additional MID depending upon the mailer's needs. This should be controlled simply within the Service Type without adding complexity and confusion to the process.
- The USPS should not apply the 30-day address correction requirement for Standard Mail using Full-Service Intelligent Mail barcode (IMb) to address corrections that return Nixie codes. The USPS has acknowledged that system functionality is not yet available to monitor and ensure compliance with this requirement. Even when such functionality is in place, however, the USPS should not apply the requirement to address corrections that return Nixie codes. The requirement for Nixie code address corrections presents a significant disincentive for Standard Mailers to use IMb Full Service. Updating address correction information for Nixies is unmanageable for Standard Mail customers.
- The USPS needs to centralize its address correction services customer support and educate support staff to be able to respond to issues with any address correction services (e.g., IMb and non-IMb address correction), and to understand the differences between the various services and data returned. Currently, customers are referred to one USPS organizational area for questions and issues on most address correction services, but to another organizational area for questions and issues with IMb Full Service address correction services. Training and education of USPS support staff is lacking and responses are inconsistent. This simply creates unnecessary confusion and distorts customer expectations.

Steve, it is important for you to know that the frustration within PostCom regarding the USPS' lack of action and response to date has reached a new peak. Our preference would be to work with the Postal Service to resolve these issues. Convening a meeting between PostCom representatives and the appropriate USPS representatives would be a good way to begin. If you agree, please contact me to work out the logistics and details.

Sincerely,

A handwritten signature in black ink, appearing to read "Gene A. Del Polito". The signature is written in a cursive, flowing style.

Gene A. Del Polito
President

cc: Board of Directors