

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

TRANSFERRING SELECTED POST OFFICE BOX SERVICE
LOCATIONS TO THE COMPETITIVE PRODUCT LIST

Docket No. MC2010-20

REQUEST OF THE UNITED STATES POSTAL SERVICE

In accordance with 39 U.S.C. § 3642 and 39 C.F.R. § 3020.30 *et seq.*, the United States Postal Service hereby requests the addition of a new product, Post Office box service (Competitive), to the competitive product list. The Postal Service proposes to establish the new product by moving Post Office box service in a small number of locations where competitive alternatives exist from the Special Services class in the market dominant product list to the competitive product list.¹ Based on its ongoing evaluation of the Post Office box service market, the Postal Service recognizes that Post Office box service faces direct competition by alternate providers of private mailbox services in many geographic markets. This modest initial proposal involves a few box sections where competitive conditions can be clearly demonstrated. This approach does not require detailed examination of costing and other issues. If a more substantial transfer is proposed, then costing and other issues could be addressed in more detail. All of the box sections proposed for transfer are located in areas where fee group 1 is applied. These are typically major metropolitan or suburban areas where substantial private mailbox services are available.

¹ 39 C.F.R. § 3020.31(a), (c).

Post Office box service offers secure mail delivery to a receptacle for a fee. In FY2009, it had revenues of \$817.1 million and costs of \$632.3 million, and made a significant contribution of \$184.8 million to institutional costs.² Post Office box service now exists only as a market dominant product, simply because it was historically classified as a special service, and all special services were initially made market dominant under section 3621(a) of title 39. Congress, however, through the inclusion of section 3642, has provided a mechanism to permit the transfer of products or portions of products initially included on the Market Dominant product list, following a request and demonstration by the Postal Service that the product to be transferred meets the statutory definition of a competitive product. This Request proposes that a very small portion of Post Office box sections within competitive markets be transferred to the competitive side. Clearly, the highly restrictive criteria employed in selecting locations for this filing do not reflect the true level of competition in the Post Office box marketplace. The Postal Service is undertaking a comprehensive evaluation of all Post Office box locations and may propose additional transfers if warranted.

This Request seeks the transfer of a small portion of Post Office box service amounting to less than 0.5 percent of the market dominant Post Office box product's revenue. Consistent with 39 C.F.R. § 3.4(f), the Governors approved the filing of this Request. No Governors' Decision pursuant to 39 U.S.C. § 3632 was needed because this Request involves no changes in the parameters of Post Office box service, and therefore adopts the MCS language from the market dominant Post Office box service product (the only differences being that the new MCS language identifies the specific

² These figures are drawn from *United States Postal Service FY 2009 Annual Compliance Report* at 53 (December 29, 2009).

box locations that would comprise the competitive product, includes only fee group 1 prices, and excludes provisions relating to Group E boxes),³ and makes no price changes.⁴

Post Office box service: (1) is not a special classification within the meaning of 39 U.S.C. § 3622(c)(10) for market dominant products; (2) will not be (following transfer) a product not of general applicability within the meaning of 39 USC § 3632(b)(3) for competitive products; and (3) is not a non-postal product.⁵

Attachment A shows the requested Mail Classification Schedule language.⁶ Attachment B provides a statement of supporting justification for this Request, as specified in 39 C.F.R. § 3020.32.⁷ Attachment C is an application for non-public treatment of facility-specific Post Office box data used in the calculation of revenue for the new product. Attachment D is a redacted version of the spreadsheet used to calculate this revenue. The original, nonpublic version of the spreadsheet is filed under separate cover.

As explained in the supporting justification, the Postal Service believes that transferring a small portion of Post Office box service is appropriate at this time, and is consistent with the standards of section 3642. The Commission should therefore approve this Request as set forth in its rules.

³ New MCS language identifies those Post Office boxes being transferred by the 5 digit ZIP Codes used for the box addresses. Group E boxes in the affected ZIP Code locations will not be transferred to the competitive product as they serve as the sole method of delivery for qualifying customers. Therefore, provisions exclusive to Group E are not mentioned in Attachment A. The unique characteristics of Group E box service is part of the ongoing evaluation of market dominant Post Office box service, and may be addressed separately in the future.

⁴ 39 C.F.R. § 3020.31(b). Only fee group 1 ZIP Codes are proposed for transfer in this filing, so only fee group 1 prices are included in the MCS language.

⁵ 39 C.F.R. § 3020.31(d).

⁶ 39 C.F.R. § 3020.31(f).

⁷ 39 C.F.R. § 3020.31(e).

As required by 39 U.S.C. § 3642(d)(1), notice of this Request is being published
in the Federal Register.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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MAIL CLASSIFICATION SCHEDULE⁸

PART B—COMPETITIVE PRODUCTS

2000 COMPETITIVE PRODUCT LIST

EXPRESS MAIL

PARCEL RETURN SERVICE

POST OFFICE BOX SERVICE

PREMIUM FORWARDING SERVICE

INTERNATIONAL

.....
xxxx Post Office Box Service (Competitive)

xxxx.1 Description

- a. **Post Office Box service provides the customer with a locked receptacle for the receipt of mail during specified hour of access to the receptacle.**
- b. **Two box keys are available upon payment of a refundable deposit. Additional keys, including replacement keys, will be provided upon payment of the key duplication or replacement fee. Changing the lock on a box is available upon request of the primary box customer and payment of the lock replacement fee.**
- c. **Prorated prices are available for postal facilities primarily serving academic institutions or the students of such institutions.**
- d. **The Postal Service may limit the number of post office boxes occupied by any one customer.**

⁸ As reflected in Notes 2 and 4 to the Request, all language for a new competitive product is new (and therefore emboldened), despite its adaptation from language for market dominant Post Office box service. Group E language and price are omitted from that original source while the list of affected Post Office box 5 digit ZIP Codes is added.

- e. Post Office Box service is not available to a customer whose sole purpose for using the service is to obtain free forwarding or transfer of mail by filing change-of-address orders.
- f. Post Office Box service in the following ZIP Code locations comprise the competitive product:

01730, 01844, 02081, 02112, 02447, 03835, 07002, 07306, 07410, 07624, 08812, 08904, 10021, 10308, 10536, 10920, 11104, 11216, 11361, 11423, 11702, 11937, 19102, 19407, 20001, 20726, 20918, 22101, 22206, 22301, 33427, 60615, 75371, 89009, 89116, 90013, 90266, 90408, 90734, 90803, 90853, 91322, 91404, 91407, 91408, 91609, 92514, 94070, 94507, 94701, 98109, and 99509.

Box Sizes

Box Size	Cubic Inches
1	under 296
2	296 to 499
3	500 to 999
4	1000 to 1999
5	2000 cubic inches and larger

xxxx.2 Price Categories

The following price categories are available for the product specified in this section:

- Regular (fees depend on box size and Post Office location)
- Academic Institutions
- Ancillary Post Office Box Services

xxxx.3 Prices***Regular***

Box Size	
1	46.00
2	70.00
3	125.00
4	255.00
5	410.00

Postal Facilities Primarily Serving Academic Institutions or Their Students

Period of box use (days)	Price
95 or less	½ semiannual price
96 to 140	¾ semiannual price
141 to 190	Semiannual price
191 to 230	1 ¼ semiannual price
231 to 270	1 ½ semiannual price
271 to full year	Two times semiannual price

Ancillary Post Office Box Services

	(\$)
Key duplication or replacement	6.00
Lock replacement	15.00
Key deposit	1.00

Statement of Supporting Justification

I, Nan McKenzie, Manager, Special Services, sponsor this Request that the Commission approve a new competitive product by transferring a small portion of Post Office box service to the list of competitive products. This statement supports the Postal Service Request by providing the information required by each applicable subsection of 39 C.F.R. § 3020.32, as indicated. I attest to the accuracy of the information contained herein.

(a) *Demonstrate why the change is in accordance with the policies and applicable criteria of the Act.*

As demonstrated below, the change complies with the applicable statutory provisions.

(b) *Explain why, as to market dominant products, the change is not inconsistent with each requirement of 39 U.S.C. 3622(d), and that it advances the objectives of 39 U.S.C. 3622(b), taking into account the factors of 39 U.S.C. 3622(c).*

The Postal Service is proposing that a small portion of Post Office box service be transferred from the market dominant product list to become a new competitive product. The Postal Service identified the affected ZIP Code locations using very conservative, objective criteria to select Post Office box sections in geographic areas that are clearly served by commercial competitors offering private mailbox services. These criteria are discussed in the next section.

The existing market dominant Post Office box service product is not changed significantly by the transfer of a few ZIP Code locations. FY2009 revenue from the selected ZIP Code locations totals about \$4 million, or less than one half of 1 percent of

total Post Office box service revenue. Details of this calculation appear in folder MC2010-20/NP1 filed with this request, and a redacted public version is provided as Attachment C. Hence, the remaining market dominant product maintains consistency with each requirement of 39 U.S.C. § 3622(d), advances the objectives of 39 U.S.C. § 3622(b), and takes into account the factors of 39 U.S.C. § 3622(c), in the same manner that the current market dominant Post Office box service product satisfies these conditions.

(c) *Explain why, as to competitive products, the addition, deletion, or transfer will not result in the violation of any of the standards of 39 U.S.C. § 3633.*

Classifying a portion of Post Office box service as a competitive product will not impair the ability of the Postal Service to meet the statutory cost coverage requirements for competitive products.

For purposes of this initial proposal (as of early March 2010), the locations selected for transfer 1) have a competitive private mailbox service provider within one-half mile, and 2) apply Post Office box fee group 1 (which has the highest fees). Furthermore, to limit the scope of this proposal, the Postal Service is proposing to transfer only one office per 3-digit ZIP Code area. Thus, when more than one ZIP Code location met the first two criteria within a particular 3-digit ZIP Code area, only the lowest numerical ZIP Code was selected.¹

Post Office box service makes a positive contribution to the Postal Service's institutional costs. For FY2009, the Postal Service's Annual Compliance Report stated that the cost coverage was 129.2 percent. The revenue that would move to the

¹ The MCS language identifies some locations that have more than one ZIP Code. See Attachment C.

competitive side if this proposal were adopted would represent less than one-half of one percent (0.47 percent) of the overall Post Office box revenue. The portion of in use boxes that are to be moved is even smaller: 0.24 percent of all boxes in use. The calculations for these percentages can be found in folder MC2010-20/NP1, with a redacted calculation in Attachment C. To the extent an attempt at quantifying the de minimis amount of costs that would move to the competitive side is deemed necessary for either this proceeding, or the FY2010 ACR, a proportion of total Post Office box costs between 0.24 percent and 0.47 percent would serve as a reasonable proxy. Should the Postal Service seek to move an additional portion of Post Office box service to the competitive product list in the future, it could provide a methodology for more exact attribution to respective market dominant and competitive products. This Request, however, involves such a small proportion of revenue and associated costs that developing and introducing a cost methodology would have little practical effect and add unnecessary complexity.

There is no reason to believe that the boxes being proposed for transfer have a cost coverage below the cost coverage for Post Office box service as a whole. As a whole, the cost coverage for Post Office box service is high -- and intuitively, all else equal, one could assume that the highest revenue boxes have a healthy coverage. In any event, it is nearly impossible that these boxes could have a coverage so much lower than the average that moving them to a competitive product would result in a coverage lower than 100 percent. Consequently, the Postal Service is confident that the revenues for the locations comprising the new competitive product will cover the attributable costs.

Therefore, if it is classified as a competitive product, Post Office box service is expected to meet the requirements of 39 U.S.C. § 3633(a)(2), and this transfer of Post Office box service in a few locations will not impair the ability of competitive products, as a whole, to comply with 39 U.S.C. § 3633(a)(3), which, as implemented by 39 C.F.R. § 3015.7 (c), requires competitive products to contribute a minimum of 5.5 percent to the Postal Service's total institutional costs. Accordingly, no issue of subsidization of competitive products by market dominant products arises (39 U.S.C. § 3633(a)(1)).

- (d) *Verify that the change does not classify as competitive a product over which the Postal Service exercises sufficient market power that it can, without risk of losing a significant level of business to other firms offering similar products: (1) set the price of such product substantially above costs, (2) raise prices significantly; (3) decrease quality; or (4) decrease output.*

Customers using Post Office box service include consumers and businesses. Many prefer the enhanced security and privacy of delivery for which they pay a premium. Many home-based businesses also use Post Office boxes as a business address, thus shielding their residential addresses or separating personal from business mail. For others, Post Office boxes provide an address for use during a period of transition in their lives.

Customers wanting any of these or other attributes of a secure mailbox where they can receive mail may avail themselves of Post Office box service, or various commercial alternatives, in the area where they live or conduct business. These commercial alternatives include the private mailbox services offered by UPS Stores, as well as other private mailbox providers such as PostNet and PakMail, which provide direct substitutes for Post Office box service. Advertising by private mail box providers seeks to induce customers to choose their private mailbox service over Post Office box

service, showing that these providers view their businesses as direct substitutes for Post Office box service. See, e.g.,

<http://theupsstore.com/products/pages/maiandpos.aspx?gclid=CPuVoJOAqqACFQQNDQodtQ6JZQ> in which UPS states that “we’ve out boxed the P.O. Box”, as well as UPS’s direct comparison of its mailbox services to the Postal Service’s:

http://theupsstore.com/customer/faq/pages/faq_maiposser.aspx#q1.

Customers who for reasons of price or service quality do not like Post Office box service at the selected competitive locations can instead utilize private mailbox service, such as that offered by the nearby competitor. The existence of these competitive alternatives constrains the Postal Service from exercising sufficient market power to set the price of Post Office box service at these locations substantially above costs, raise prices significantly, decrease quality, or decrease output, without the risk of losing business.

- (e) *Explain whether or not each product that is the subject of the request is covered by the postal monopoly as reserved to the Postal Service under 18 U.S.C. 1696, subject to the exceptions set forth in 39 U.S.C. 601.*

Post Office box service is not covered by these provisions. See part (d) above.

- (f) *Provide a description of the availability and nature of enterprises in the private sector engaged in the delivery of the product.*

See part (d) above.

- (g) *Provide any available information on the views of those who use the product on the appropriateness of the proposed modification.*

The Postal Service does not have customer research on whether Post Office box service should be regulated as a market dominant or competitive product. However,

because of the existence of numerous providers of private mailbox services, the Postal Service would expect that most customers recognize that a competitive market exists.

(h) Provide a description of the likely impact of the proposed modification on small business concerns.

The Postal Service expects the impact upon small business customers will be minimal, considering the small scale of this proposal, and the existence of a clear competitive alternative at a nearby private mailbox service provider in the event a customer is dissatisfied with any changes made at these offices.

Private mail box providers are generally small businesses (including UPS Stores, which are independently owned and operated by franchisees). In a competitive market, the primary regulatory concern regarding small businesses is not that a Postal Service offering is over-priced, but that it is under-priced. Within the regulatory structure established by the PAEA, the competitive product rules are designed to address this concern. They establish a cost floor for products and services designed to ensure fair Postal Service competition within the market place.² Conversely, the regulatory structure for market dominant products is designed to protect customers in markets where the Postal Service has substantial market power, by limiting price increases through the price cap; this limitation is more likely to be adverse to the interests of small business competitors of Post Office box service.

(i) Include such other information, data, and such statements of reasons and bases, as are necessary and appropriate to fully inform the Commission of the nature,

² See Comments of National Association of Retail Shipping Centers, Inc. (June 16, 2008), filed in response to Order No. 80 in Docket No. MC2008-4 (Transfer of Premium Forwarding Service), at 1: "NARSC endorses and supports a floor price that is consistent with the current fee structure. Pricing below that level substantially affects the PMB [Private Mail Box] industry as a predatory business practice."

scope, significance, and impact of the proposed modification.

The assignment of Post Office box service to the market dominant product list was based on the statutory classification of all “special services” as market dominant. 39 U.S.C. § 3621(a)(9). While Congress placed special services on the market dominant side as an initial matter, it also specifically allowed the transfer under section 3642 of those special services for which the Postal Service lacks market power. Transfer of these Post Office box locations to the competitive product list is consistent with section 3642, and will ensure that the product is more appropriately classified, since, as demonstrated above, these Post Office box service locations exist within a competitive market.

**APPLICATION OF THE UNITED STATES POSTAL SERVICE FOR NON-PUBLIC
TREATMENT OF MATERIALS**

In accordance with 39 C.F.R. § 3007.21 and Order No. 225,¹ the United States Postal Service (Postal Service) hereby applies for non-public treatment of certain materials filed under seal with the Commission. The materials consist of the calculation of revenue for the ZIP Code locations proposed for inclusion in Post Office box service on the competitive product list. A redacted version is reproduced as Attachment D to the underlying Request.

(1) The rationale for claiming that the materials are non-public, including the specific statutory basis for the claim, and a statement justifying application of the provision(s);

The materials designated as non-public consist of information of a commercial nature that under good business practice would not be publicly disclosed. In the Postal Service's view, this information would be exempt from mandatory disclosure pursuant to 39 U.S.C. § 410(c)(2) and 5 U.S.C. § 552(b)(3) and (4).² Because the portions of the materials that the Postal Service is applying to file only under seal fall within the scope of information not required to be publicly disclosed, the Postal Service asks the

¹ PRC Order No. 225, Final Rules Establishing Appropriate Confidentiality Procedures, Docket No. RM2008-1, June 19, 2009.

² In appropriate circumstances, the Commission may determine the appropriate level of confidentiality to be afforded to such information after weighing the nature and extent of the likely commercial injury to the Postal Service against the public interest in maintaining the financial transparency of a government establishment competing in commercial markets. 39 U.S.C. § 504(g)(3)(A). The Commission has indicated that "likely commercial injury" should be construed broadly to encompass other types of injury, such as harms to privacy, deliberative process, or law enforcement interests. PRC Order No. 194, Second Notice of Proposed Rulemaking to Establish a Procedure for According Appropriate Confidentiality, Docket No. RM2008-1, Mar. 20, 2009, at 11.

Commission to support its determination that these materials are exempt from public disclosure and grant its application for their non-public treatment.

(2) Identification, including name, phone number, and email address for any third-party who is known to have a proprietary interest in the materials, or if such an identification is sensitive, contact information for a Postal Service employee who shall provide notice to that third party;

The Postal Service does not believe that any third parties have a proprietary interest in these materials.

(3) A description of the materials claimed to be non-public in a manner that, without revealing the materials at issue, would allow a person to thoroughly evaluate the basis for the claim that they are non-public;

The non-public material includes the numbers of rented boxes and box revenue for each of the Postal Service locations identified as competitive. The Postal Service maintains that the non-public portions of these materials should remain confidential.

The Excel file filed under seal displays the data which may be withheld from mandatory public disclosure by virtue of 39 U.S.C. § 504(g)(1) and 39 U.S.C. § 410(c)(2). These facility-specific box data are commercially sensitive.

(4) Particular identification of the nature and extent of commercial harm alleged and the likelihood of such harm;

If the information that the Postal Service determined to be protected from disclosure due to its commercially sensitive nature were to be disclosed publicly, the Postal Service considers it quite likely that it would suffer commercial harm. Revealing box usage and box revenue at competitive locations would enable competitors to focus marketing efforts on particular Postal Service locations at which there are many potential customers for the competitor. The Postal Service considers that it is highly

probable that, if this information were made public, the Postal Service's competitors would take immediate advantage of it.

(5) At least one specific hypothetical, illustrative example of each alleged harm;

Harm: Revealing facility-specific box usage data would enable competitors to target the location for sales and marketing purposes.

Hypothetical: Box usage and box revenue at a particular location are revealed to the public. A nearby private mailbox provider reviews the information, and determines that there are enough potential customers at the postal location that an advertising campaign would be justified. The private company directs advertising for its mailbox service to the postal customers, perhaps using a billboard near the postal location and offering to match postal prices for a three-month trial.

(6) The extent of protection from public disclosure deemed to be necessary;

The Postal Service maintains that the portions of the materials filed non-publicly should be withheld from persons involved in competitive decision-making in the relevant markets for Post Office box service, as well as their consultants and attorneys.

(7) The length of time deemed necessary for the non-public materials to be protected from public disclosure with justification thereof; and

The Commission's regulations provide that non-public materials shall lose non-public status ten years after the date of filing with the Commission, unless the Commission or its authorized representative enters an order extending the duration of that status. 39 C.F.R. § 3007.30. The Postal Service believes that the ten-year period of non-public treatment is sufficient to protect its interests with regard to the information it determined should be withheld due to commercial sensitivity.

(8) Any other factors or reasons relevant to support the application.

None.

Conclusion

For the reasons discussed, the Postal Service asks that the Commission grant this application for non-public treatment of the identified materials.

Area	District	Office Name	City	State	Box ZIP Code	PO Box Locations Proposed Move to Competitive with Revenue and Box Count Information Compared to All PO Boxes					
						Size 1	Size 2	Size 3	Size 4	Size 5	Total
						Rented Boxes*	Rented Boxes*	Rented Boxes*	Rented Boxes*	Rented Boxes*	Rented Boxes*
NORTHEAST	GREATHER BOSTON	BEDFORD RETAIL UNIT	BEDFORD	MA	01730	1					
NORTHEAST	GREATHER BOSTON	METHUEN	METHUEN	MA	01844	1					
NORTHEAST	SE NEW ENGLAND	WALPOLE	WALPOLE	MA	02081	1					
NORTHEAST	GREATHER BOSTON	LAFAYETTE STATION	BROOKLINE	MA	02447	1					
NORTHEAST	GREATHER BOSTON	BROOKLINE VILLAGE	BROOKLINE	MA	02447	1					
NORTHEAST	NORTHERN NEW ENGLAND	FARMINGTON	FARMINGTON	NH	03835	1					
NORTHEAST	NORTHERN NEW JERSEY	BAYONNE	BAYONNE	NJ	07002	1					
NORTHEAST	NORTHERN NEW JERSEY	JOURNAL SQUARE	JERSEY CITY	NJ	07306	1					
NORTHEAST	NORTHERN NEW JERSEY	FAIR LAWN	FAIR LAWN	NJ	07410	1					
NORTHEAST	NORTHERN NEW JERSEY	CLOSTER	CLOSTER	NJ	07624	1					
NORTHEAST	NORTHERN NEW JERSEY	DUNELLEN	DUNELLEN	NJ	08812	1					
NORTHEAST	NORTHERN NEW JERSEY	HIGHLAND PARK	HIGHLAND PARK	NJ	08904	1					
NORTHEAST	NORTHERN NEW JERSEY	LENOX HILL STATION	NEW YORK	NY	10021	1					
NORTHEAST	WESTCHESTER	GREAT KILLS FINANCE	STATEN ISLAND	NY	10308	1					
NORTHEAST	WESTCHESTER	KATONAH	KATONAH	NY	10536	1					
NORTHEAST	TRIBORO	CONGERS	CONGERS	NY	10920	1					
NORTHEAST	TRIBORO	SUNNYSIDE	SUNNYSIDE	NY	11104	1					
NORTHEAST	TRIBORO	BREVOORT	BROOKLYN	NY	11216	1					
NORTHEAST	TRIBORO	BAYSIDE FINANCE	BAYSIDE	NY	11361	1					
NORTHEAST	TRIBORO	HOLLIS	HOLLIS	NY	11423	1					
NORTHEAST	LONG ISLAND	BABYLON	BABYLON	NY	11702	1					
NORTHEAST	LONG ISLAND	EAST HAMPTON	EAST HAMPTON	NY	11937	1					
EASTERN	PHILADELPHIA	PENN CENTER	PHILADELPHIA	PA	19102	1					
EASTERN	PHILADELPHIA	AUDUBON	AUDUBON	PA	19407	1					
CAPITAL METRO	CAPITAL	LE DROIT PARK	WASHINGTON	DC	20001	1					
CAPITAL METRO	CAPITAL	WOODMOOR	LAUREL	MD	20726	1					
CAPITAL METRO	CAPITAL	MC LEAN	SILVER SPRING	MD	20918	1					
CAPITAL METRO	NORTHERN VIRGINIA	SHIRLINGTON	MC LEAN	VA	22101	1					
CAPITAL METRO	NORTHERN VIRGINIA	POTOMAC	ARLINGTON	VA	22206	1					
SOUTHEAST	NORTH FLORIDA	PALMETTO PARK POSTAL STORE	ALEXANDRIA	VA	22301	1					
SOUTHEAST	SOUTH FLORIDA	LAKE PARK POSTAL STORE	BOCA RATON	FL	33427	1					
SOUTHWEST	CHICAGO	EAST SIDE FINANCE	CHICAGO	IL	60615	1					
WESTERN	NEVADA SIERRA	HENDERSON	DALLAS	TX	75371	1					
WESTERN	NEVADA SIERRA	HUNTRIDGE	HENDERSON	NV	89009	1					
PACIFIC	LOS ANGELES	ARCADIA	LOS ANGELES	NV	89116	1					
PACIFIC	LOS ANGELES	DOWNTOWN MANHATTAN BEACH	LOS ANGELES	CA	90013	1					
PACIFIC	LOS ANGELES	WILL ROGERS	MANHATTAN BEACH	CA	90266	1					
PACIFIC	SANTA ANA	EASTVIEW	SANTA ANA	CA	90408	1					
PACIFIC	SANTA ANA	BELMONT SHORE	SAN PEDRO	CA	90734	1					
PACIFIC	SANTA ANA	BELMONT SHORE	LONG BEACH	CA	90803	1					
PACIFIC	SIERRA COASTAL	LYONS	LONG BEACH	CA	90853	1					
PACIFIC	SIERRA COASTAL	CIVIC CENTER VAN NUYS	NEW HALL	CA	91322	1					
PACIFIC	SIERRA COASTAL	CIVIC CENTER VAN NUYS	VAN NUYS	CA	91404	1					
PACIFIC	SIERRA COASTAL	CIVIC CENTER VAN NUYS	VAN NUYS	CA	91404	1					
PACIFIC	SAN DIEGO	VICTORY CENTER	VAN NUYS	CA	91408	1					
PACIFIC	SAN FRANCISCO	HARDMAN	NORTH HOLLYWOOD	CA	91609	1					
PACIFIC	BAY-VALLEY	SAN CARLOS	RIVERSIDE	CA	92514	1					
PACIFIC	BAY-VALLEY	ALAMO	SAN CARLOS	CA	94070	1					
PACIFIC	SEATTLE	BERKELEY	ALAMO	CA	94507	1					
PACIFIC	SEATTLE	QUEEN ANNE	BERKELEY	CA	94701	1					
PACIFIC	ALASKA	SPENARD	SEATTLE	WA	98109	1					
PACIFIC	ALASKA		ANCHORAGE	AK	99509	1					
Total						22,033	7,172	2,314	332	38	31,889
Total for all PO Boxes FY2009 (From FY2009 ACR CRA and Billing Determinants)						8,342,110	3,422,108	1,082,146	167,955	29,479	13,043,798
Competitive PO Boxes as Percentage of Total						0.2641%	0.2096%	0.2138%	0.1977%	0.1289%	0.2445%

* Rented Box Volumes from 12/31/2009 systems report.
 ** Annual Fee calculated from rates effective May 11, 2009.

