

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Request to Add Private Address Forwarding To the Market  
Dominant Product List

Docket No. MC2013-60

PETITIONER'S MOTION FOR PRC ORDER  
FOR DISCLOSURE OF RELATED USPS DOCUMENTS

October 18, 2013

On October 16, 2013, the USPS submitted a reply<sup>1</sup> to PRC order 1838 in the pending PRC docket #MC2013-60 about my proposal for Private Address Forwarding.

The USPS' reply, and subsequent conversation with its attorney Michael Tidwell, indicated that the USPS has considered multiple similar proposals in the past dating back as far as 2001, "either as a discrete product concept or as part of a larger suite of potential services"<sup>2</sup>, as well as "other concepts in [the USPS'] product development pipeline" including:

1. Patent #7,295,997, in which merchants generate "[l]abel information [e.g.] a random number ... to identify the customer [without] includ[ing] the customer's name or address information" and "the shipper may read ... the label to determine the customer's name and address, apply [a] new label that has the customer's name and address to the package, and ship the package to the customer ... [so that] the customer's information remains anonymous from the merchant."
2. Patent application 20120011068 ("Mail My Way"), in which "a 'virtual address' or 'vanity address' is arbitrary character data defined by a mail recipient that is other than a physical address or mailing address of the customer ... for use in lieu of their ... physical address"

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<sup>1</sup> <http://prc.gov/Docs/88/88005/USPS.Reply.Ord.1838.pdf>

<sup>2</sup> all quotes are from the USPS reply to Order 1838, *supra*

3. Trademark application 8600747 ("Digital License Plate"), which concept includes "providing authentication of personal identification, secure storage of personal information, and encoding of identification information on valuable documents and products"

The substance of the USPS' Reply was founded in very large part of the feasibility of my proposal. The USPS' significant history of having already deliberated the feasibility, priority, demand, etc., of what the USPS itself claims to be very similar proposals has a clear and immediate relevance to this proceeding. As such, such deliberations would be extremely informative for both the Commission and third party commenters (including myself) in independently evaluating the feasibility concerns the USPS has raised.

The USPS cannot in good faith argue simultaneously that the Commission should not act on this proposal without an evaluation of its feasibility, that it has already evaluated similar proposals, *and* that the Commission (and the public) should not take those previous evaluations into consideration.

Therefore, I respectfully request that the Commission order the USPS to publicly file to this docket all documents related to these and similar proposals (including Private Address Forwarding itself), including but not limited to:

1. investigations of "availability of technology, operational feasibility, associated costs, potential demand marketability, [and/or] policy implications" of such proposals
2. the "direction [and/or] prioritization of [] pre-decisional product development investigations" of such proposals
3. feasibility or technical standards for record storage systems for such proposals and/or for PO Box holder identities
4. "procedures in place that protect the identities and street addresses of individuals" and associated "records system"(s)

5. the "relative rankings of DLP" and other such proposals with respect to unrelated proposals contemplated by the USPS

Sincerely,  
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Petitioner

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P.S. Please note that I have today filed with the USPS an expedited FOIA request (2014-FPRO-00057<sup>3</sup>) for the same materials. I intend to file to this docket any responsive documents that are not furnished in response to an order based on this motion.

I have filed this motion separately, because the Commission's authority to require information from the USPS relevant to the PRC's regulatory proceedings is significantly stronger than the rights granted to the general public by the FOIA within the limitations of 39 U.S.C. 410(c)<sup>4</sup>.

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<sup>3</sup> <http://s.ai/paf/2013-10-18%20FOIA%20request%20for%20documents%20related%20to%20PAF.pdf>

<sup>4</sup> <http://www.law.cornell.edu/uscode/text/39/410>