

NAPM-RT-1

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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)

Docket No. R2006-1

**REBUTTAL TESTIMONY OF ELIZABETH A. BELL
ON BEHALF OF
NATIONAL ASSOCIATION OF PRESORT MAILERS**

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November 20, 2006

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REBUTTAL TESTIMONY OF

ELIZABETH A. BELL

ON BEHALF OF

NATIONAL ASSOCIATION OF PRESORT MAILERS

I. INTRODUCTION AND SUMMARY

A. Background and Qualifications

My name is Elizabeth A. Bell. I am the owner and chief executive officer of Access Mail Processing Services, Inc. in Clearwater, Florida. My experience in mail processing dates back to 1970 when, as a college student, I worked for the United States Postal Service in a wide variety of jobs, the last of which was carrying a rural delivery route during my last year in college.

I established what is now Access Mail Processing Services, Inc. in 1986 and opened for business on January 5, 1987, under the name Pinellas Insured Presort, Inc. I am and have been the owner and chief executive officer of the company since its creation.

Access Mail Processing Services is the one of the oldest and largest presort mailing company in Southwest Florida. It was also one of the first to become automated, which we did in 1991. We currently process an average of approximately 145,000 pieces of mail per day, a volume that makes us a small to medium-size presort bureau.

B. Summary of Testimony

The purpose of my testimony is to respond to several assertions by Kathryn Kobe in her testimony (APWU-T-1) on behalf of the American Postal

1 Workers Union, AFL-CIO, concerning the characteristics of mail processed by
2 the presort mailing industry and the work that presort bureaus perform. Based
3 on my two decades of experience in the mailing industry, the single-piece First-
4 Class Mail most likely to convert to presort mail has the physical and cost
5 characteristics typical of collection mail, not bulk metered mail (“BMM”). Hence,
6 if the Commission shares Ms. Kobe’s goal of having two mailers with similar
7 pieces of mail pay the “same contribution to overhead costs, irrespective of
8 whether they workshare” (Kobe Direct, p. 15), the rate discounts offered for
9 presort vs. single-piece First-Class Mail need to reflect the cost differences
10 between presort mail and collection mail, not presort mail and BMM.

11 **II. THE SINGLE-PIECE FIRST-CLASS MAIL MOST LIKELY TO CONVERT**
12 **TO PRESORT MAIL HAS THE PHYSICAL CHARACTERISTICS OF**
13 **COLLECTION MAIL, NOT BULK METERED MAIL.**

14 I understand that rates for presort First-Class Mail are calculated by first
15 determining the cost incurred by the USPS to process and deliver an average
16 piece of “BMM”, and then subtracting from that amount the estimated cost
17 savings from the worksharing performed by mailers or by mail processors for
18 mailers. I also understand that BMM is a hypothetical construct defined as First-
19 Class mailpieces entered in bulk, in trays, properly addressed, uniformly and
20 correctly faced, and with the proper postage already applied—all without any
21 discount for these preparatory steps.

22 In her testimony, APWU witness Kathryn Kobe (APWU-T-1) offers several
23 grounds for continuing to use the hypothetical BMM benchmark. She notes that
24 the rate benchmark for workshared First-Class letter mail has previously been
25 based on BMM. She criticizes USPS witness Taufique for asserting without any
26 “studies on this topic” that there has been a change in the type of mail that is now

1 converting to presort. She asserts (without, it seems appropriate to note, any
2 studies of her own or anyone else) that “it seems highly unlikely that the mail that
3 is converting to presort mail is equivalent to the *average* collection mail that is
4 coming from individual households, nonprofit organizations, and small
5 businesses.” APWU-T-1 at p 15, lines 2-5 (Kobe). Ms. Kobe is mistaken on
6 several grounds.

7 First, she provides no reason for believing that the hypothetical BMM
8 benchmark is embodied in any significant amount of actual mail. On cross-
9 examination, she conceded that she did not know what percentage of single-
10 piece First-Class Mail is BMM, or whether BMM constitutes even one percent of
11 single-piece First-Class Mail. 20 Tr. 7198, line 22, to 7199, line 8. She admitted
12 that “I haven’t personally seen it,” *id.*, p. 7199, line 13, and simply “assume[s] it
13 exists.” *Id.*

14 Like Ms. Kobe, I have never seen BMM. Unlike her, however, I am
15 unwilling simply to “assume it exists.” For the past 20 years, I have earned a
16 living by converting unsorted First-Class letter mail into workshared First-
17 Class Letter Mail. As a result, I am quite familiar with the characteristics of
18 presorted First-Class Mail before it is presorted. Before I started my company,
19 one of the jobs I performed for the United States Postal Service was to collect
20 mail from its collection boxes. I remember what kind of mail was in those boxes
21 then. The First-Class Mail that we receive for presorting from customers who
22 have not previously used a presort bureau—i.e., from our new customers—in fact
23 is similar to collection mail, not BMM. The simple truth is, we would be thrilled to
24 get collection box mail to process. It would not present us with any challenges
25 we do not face now on a daily basis:

- 1 • Most customers do not know what sizes of envelopes are acceptable
2 for automation mail.
- 3 • Nor do most customers know what type faces can and cannot be read
4 by optical character readers. They would use whatever type face they
5 fancied and whatever color envelope they like, without regard to
6 whether it would provide adequate contrast with a USPS applied
7 POSTNET barcode.
- 8 • Many pieces we process have hand written addresses, not pristine
9 typed or computer-generated addresses like those on BMM.
- 10 • Most mailers do not know what a barcode clear zone is, and would
11 have no reason to provide one.
- 12 • Most do not know what Move Update is. Absent any discount, these
13 mailers would have no reason to comply with Move Update
14 requirements, especially for First-Class Mail, which the USPS forwards
15 free of additional charge.
- 16 • Most mailers do not understand “loop mail” (mail that is designed in a
17 way that causes the optical character reader—whether owned by the
18 Postal Service or a presort bureau—to read the return address and
19 send the mailpiece back to the sender) or how to avoid it.
- 20 • Nor would mailers have any reason to be concerned if some of their
21 envelopes are stuck together or are unsealed prior to processing.
- 22 • Most would not know how to properly use tabs and wafer seals.

1 There is certainly no reason to assume that mailers would put mail in
2 postal trays if they didn't have to get a discount. They might do it some of the
3 time, a few even most of the time, but probably none that would do it all the time.

4 • First, where would they get the trays? Our customers get them from
5 us. Without us, they could, perhaps, get them from the Postal Service,
6 if they thought of doing so and if the Postal Service did not mind taking
7 time at the busiest part of the day—the late afternoon and early
8 evening when most mailers want to deposit their mail—to hand out
9 empty trays. This assumes, of course, that they haven't already
10 dumped their mail into a collection box or simply handed it to their
11 carrier in some old box they had lying around.

12 • Second, why would mailers with less than full trays of mail want to use
13 trays anyway? Access Mail Processing Service has a daily minimum
14 of 200 hundred pieces per customer, in part because we do not meter
15 mail for customers and most customers with fewer than 200 piece of
16 mail a day do not have a postage meter. Some presort bureaus do
17 meter mail for customers. Those shops might be willing and able to
18 operate with a lower or even no average daily minimum; but they may
19 charge a fee for handling customer mail. My point is that even with a
20 daily average minimum of 200 pieces, we are not getting full trays of
21 mail. Two hundred pieces of First-Class Mail would rarely if ever fill a
22 postal letter tray. Generally, it wouldn't even fill a half tray. So, what
23 we are getting from our small customers, who constitute around 23
24 percent of all our customers, is clearly not BMM.

- 1 • Third, what incentive would mailers have to take the time or trouble to
2 seek out trays to use? Single-piece mail can be entered in any
3 container available, including grocery bags and paste-board boxes—or
4 just dumped into a collection box without any container at all.
- 5 • Fourth, what incentive would mailers have to place the mail in the
6 proper orientation or sequence? Single-piece mail may be unbundled
7 or bundled. The individual pieces may be sequenced randomly, or not
8 sequenced at all. Mail in boxes might well be placed there with every
9 other handful inverted, which increases the ease of putting mail into a
10 box without flared ends.

11 It is also worth noting that what the Postal Service requires presort
12 bureaus to do with “full-paid” mail. Every presort bureau winds up every day with
13 some mail that has to be paid up to the full rate. This is mail that presort bureaus
14 process without any markup or profit. Nevertheless, the Postal Service insists
15 that when we present this “full-paid mail,” the stamped mail must be separated
16 from business reply envelopes (“BREs”) and that both stamped mail and BRE be
17 separate from metered mail. The Postal Service also insists that we separate
18 flats from letters, Express and Priority mail from First-Class Mail, and separate
19 packages from other shapes.

20 The bottom line is that the mail received by presort bureaus from their new
21 customers (indeed, most of their existing customers) needs considerable
22 processing by the presort bureaus before they can tender it to the Postal Service.
23 The full-paid mail the Postal Service gets from presort bureaus is not collection
24 box mail, but trays of faced envelopes, segregated by method of payment
25 evidencing. This is mail that our customers could simply have handed to a

1 carrier in any order or container or stuffed in a collection box. But if we present it
2 for them, we have to clean it up. If it were BMM, it would already be clean, by
3 assumption.

4 This is not an insignificant amount of mail. Access Mail Processing
5 Services usually has about 8,000 pieces of full-paid mail every day. That
6 equates to some forty trays of mail, or a little over five percent of the mail we
7 process.

8 Ms. Kobe may be correct on one point: there probably has not been any
9 recent “change in the type of mail that is ‘now’ converting to presort.” Most mail
10 that could easily convert from full-paid single piece mail to presort mail converted
11 a long time ago. What I am hoping is that this longstanding circumstance will
12 finally be acknowledged by the Commission in this case.

13 Today, one has to work hard to find new customers with untapped
14 volumes of single-piece mail. When these volumes turn up, they do not appear
15 in trays of nice clean letters, properly oriented with typed addresses and a
16 barcode clear zone, etc. There simply are not any mailers sitting around with
17 trays of that sort of mail in southwest Florida. And I have heard nothing about
18 the existence of such mailers from my industry peers elsewhere in the United
19 States.

20 **III. THE SINGLE-PIECE FIRST-CLASS MAIL MOST LIKELY TO CONVERT**
21 **TO PRESORT MAIL HAS COST CHARACTERISTICS MORE AKIN TO**
22 **COLLECTION MAIL THAN BULK METERED MAIL.**

23 For the reasons discussed above, the single-piece First-Class Mail most
24 likely to convert to presort mail tends to have the costs of collection mail, not the
25 lower costs of bulk metered mail. Mail with inappropriate envelope sizes, or with

1 handwritten or otherwise non-machinable addresses, or with no barcode clear
2 zones, or with stale addresses or stuck-together envelopes, or missing or
3 improperly set tabs and wafer seals costs the Postal Service more to process
4 than mail without these problems. Mail stuffed into cardboard boxes or other
5 unsuitable containers costs the Postal Service more to process than mail
6 properly faced and oriented in trays. Mixed mailings of stamped mail, business
7 reply envelopes and metered mail presumably cost the Postal Service more to
8 process than mail properly segregated. The same is presumably true of mailings
9 with pieces of mixed vs. uniform shapes.

10 Attached, as Attachment A, to this testimony, is a copy of a twenty-seven
11 page "Customer Service Directory" that we give to every customer. The booklet
12 provides the information mailers need to prepare their mail properly to qualify for
13 discounts. We explain these requirements in our "Customer Service Directory"
14 because most mailers are unfamiliar with them. If most mailers already had the
15 information included in our "Customer Service Directory," there would have been
16 no need for us to incur the expense of creating, publishing, updating and
17 distributing this information booklet.

18 Even after we give each customer its own copy of our "Customer Service
19 Directory," we still have work with customers, and check their mail every day, to
20 ensure compliance with the rules for automation mail. We have a full-time
21 customer service representative who works with new customers to improve their
22 mail. Our customer service representative also contacts existing customers
23 when our three-person check-in quality-control team identifies a problem. Even
24 good customers slip up occasionally; bad ones slip up all the time. One of the
25 secrets of the business is knowing your customers well enough and being in
26 contact with them often enough to know when they are making changes in

1 personnel, equipment, supplies or processes that could impact their mail and
2 working with them to make sure that these changes do not adversely effect their
3 mail.

4 On an average day, we return to our customers 200 letters that are
5 improperly prepared. There are many reasons for returning mailpieces. Some
6 envelopes have an address that is missing, incomplete, or upside down. The
7 insert in some window envelopes may be inserted backwards, etc. All 200 of
8 these mail pieces would be undeliverable as addressed, if entered by us or by
9 the mailer (except, of course, mailpieces returned to the sender for insufficient
10 postage applied, a phenomenon apparently assumed away for BMM by defining
11 it as mail that is fully paid).

12 I do not know the average cost to the USPS of returning undeliverable as
13 addressed mail. If the average amount is just 50 cents per piece, an estimate I
14 am told is probably low, our interception of the 200 letters alone saves the USPS
15 \$100 per day.

16 **IV. USING BMM AS A RATE BENCHMARK WILL NOT EQUALIZE THE**
17 **CONTRIBUTION PER PIECE FROM SINGLE-PIECE AND PRESORT**
18 **MAIL.**

19 The above discussion should make obvious that I also disagree with Ms.
20 Kobe's contention that the Commission should adopt BMM as the benchmark for
21 calculating presort rate discounts "to make certain that two mailers with identical
22 pieces of mail are paying the same contribution to overhead costs, irrespective of
23 whether they workshare." Kobe Direct (APWU-T-1), p. 15. Ms. Kobe's
24 statement assumes that the average piece of single-piece mail that is a
25 candidate for conversion by presort bureaus into presort mail has the same

1 physical cost and characteristics as BMM. For the reasons discussed in Section
2 II and III, however, this assumption is untrue: the single-piece mail that is
3 currently available to convert to presort mail is dirtier and more costly to process
4 than BMM. Hence, limiting presort rate discounts to the cost savings available
5 from converting mail as clean as the hypothetical BMM benchmark mail would
6 cause the average piece of presort First-Class Mail to pay a *far larger*
7 contribution to overhead costs than the average piece of single-piece mail.

8 Ms. Kobe conceded on cross-examination, for example, that a letter with a
9 computer-generated address typically costs the Postal Service less to process
10 than an otherwise similar piece “that is handwritten and has to be remote
11 barcoded by a manual operator.” 20 Tr. 7196, lines 14-18. Presort First-Class
12 mail must have a machinable address; single-piece mail need not, and often
13 does not. *Id.*, p. 7196, line 19, to 7197, line 4. Ms. Kobe is not proposing to offer
14 a discount for putting a machinable address on a single piece letter. *Id.*, p. 7197,
15 line 5-8. Hence, under her rate design, “first class letters with handwritten
16 addresses are unlikely to be making the same contribution to the Postal Service
17 institutional costs as otherwise identical letters with typed or printed addresses
18 . . . That’s part of the averaging of the first class rate.” *Id.*, p. 7197, lines 9-15.

19 Ms. Kobe also conceded her proposed rate design would not offer First-
20 Class mailers discounts for buying postage through a less costly channel than a
21 retail counter, or entering mail in a Postal Service facility rather than a street
22 collection box. *Id.*, pp. 7197, line 16, to 7198, line 11. These mailer activities
23 save the Postal Service money. *Id.*, pp. 7197, lines 16-20. Because her rate
24 design does not offer discounts to single-piece mailers for engaging in these
25 activities, the result could be “differences in institutional cost contributions for
26 mail that varied only in that attribute.” *Id.*, p. 7197, line 24, to 7198, line 2.

1 One could multiply these examples with others from Section II and III,
2 above. They underscore that the cost savings actually enjoyed by the Postal
3 Service from presort First-Class Mail go far beyond the savings recognized by
4 the BMM benchmark. Failure to recognize the full range of the cost savings in
5 rate discounts most definitely will cause presort First-Class Mail to bear a larger
6 “amount of the institutional cost of the Postal Network” (Kobe Direct, p. 4) than an
7 otherwise identical piece of single-piece mail.

8

**ACCESS MAIL
CUSTOMER SERVICES DIRECTORY**

Welcome to



Customer Services Directory

Access Mail Processing Services, Inc.
14240 62nd St N ☒ Clearwater FL 33760-2717
727-539-6245 ☒ 800-711-6245
Fax: 727-531-5353 e-mail: Sales@AccessMailOnline.com
Under Construction: AccessMail.biz



“Customer Service Directory”

is produced for the exclusive use of customers
of Access Mail Processing Services, Inc.

We hope the information contained will be of
value to your mailroom personnel.

If you have any suggestions for additions to this
manual, please contact us.

Thank You

Postage Rates for Presort Mail

Effective Date: 1/08/2006

FIRST CLASS LETTER-SIZE MAIL - PRESORT

UP TO BUT NOT EXCEEDING	PRESORT	FULL RATE
OUNCE	\$0.371	\$0.39
2 OUNCES	\$0.608	\$0.63
3 OUNCES	\$0.802	\$0.87
4 OUNCES	\$1.039	\$1.11
5 OUNCES	\$1.276	\$1.35
6 OUNCES	\$1.513	\$1.59
7 OUNCES	\$1.750	\$1.83
8 OUNCES	\$1.987	\$2.07
9 OUNCES	\$2.224	\$2.31
10 OUNCES	\$2.461	\$2.55
11 OUNCES	\$2.698	\$2.79
12 OUNCES	\$2.935	\$3.03
13 OUNCES	\$3.172	\$3.27
14 OUNCES TO 1 LB	N/A	\$4.05

POSTCARDS - FULL RATE

POSTCARDS	N/A	\$0.24
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Access Mail Processing Services, Inc.
14240 62nd St N ☒ Clearwater FL 33760-2717
727-539-6245 ☒ 800-711-6245
Fax: 727-531-5353 e-mail: info@AccessMail.biz





Multi-Line Optical Character Reader

Every day Access Mail processes over 125,000 letters on a multi-line optical character reader (MLOCR). This special machine, like the US Postal Service MLOCRs, visually “looks” at the address on each letter and translates it into typing. It then matches the address it “reads” against the USPS database of almost every address in the United States, including Puerto Rico and the Virgin Islands.

If the MLOCR detects a perfect match for an address, it then produces a 12-digit “Delivery Point Barcode” (DPBC),

which pinpoints the exact place for the carrier to deliver that letter. It must be an exact match, and the MLOCR reads and codes 10 addresses per second.

This equipment is tested annually by the USPS through a MASS-test procedure. In addition, Access Mail purchases bi-weekly USPS database updates, each with the most current addressing information available. Not all US addresses are on this database since new construction is constantly expanding the list of addresses. Also, the USPS is converting many rural addresses into street address as part of a 911-emergency program.

In order for the MLOCR to match the address, it cannot default to a building, but must code for the actual suite/apartment within the building. The most common reasons a letter with a “readable” address doesn’t receive a barcode is that the directionals (N, E, S, W) are missing. It cannot guess that you mean South Main Street when there is also a matching address on North Main Street. The next most common error is the street number being “out of range.” This means there is no 11345 Oakdale Ln, only a 1345 or a 1134 Oakdale. Again, it cannot guess and must not barcode that letter.

As technology changes the cameras (optical character readers), they must be replaced. Since 2000, Access Mail replaced our camera systems, at a cost of about \$325,000. We are currently running the most technologically advanced OCRs produced by Lockheed Martin, and ID Mail Systems, including an RAF OCR engine, currently the highest-reading OCR available.

Acceptable Envelope Sizes for Discounts

These are acceptable at discounted rates:

- #10 Business & Window
- #12 Business & Window
- #9 Business & Window
- 6 x 9 Business & Window

Min. size: 3" x 5"

Max. size: 6-1/8" x 11-1/2"

Max. thickness: <0.25"

Mail must be rectangular and fit on the template provided for discounted rates.

Mail These Items At Full Rate

- International mail
- 9 x 12 and other large envelopes

These Items Will Come Back the Next Day

- Wrong or outdated Zip code
- Wrong or no postage
- No name or address
- International mail at domestic rates
- Interoffice mail

Address For Success



Over the past 15 years, the US Postal Service has been automating mail processing. Companies like Access Mail are “worksharing” partners to the USPS. Because we process mail virtually identically to USPS processing, certain standards are necessary to allow a seamless transition from our mail facility to the USPS on a daily basis.

Customers who can adhere to these standards will see more accurate delivery of their mail, better postage discounts and, overall, better response rates from the recipients of their mail. As more mailers adopt these standards, the USPS predicts they can request fewer and lower rate increases in the future.

At Access Mail, we want to provide all the tools you need to adhere to these standards. This section is a brief overview. Call us for specialized departmental training sessions, useful USPS publications and questions about mail quality.

Type Styles

Basically, these are good:

ALL CAPITAL LETTERS READ BEST

MONOSPACED, RATHER THAN PROPORTIONAL

ANY TYPE THAT IS WELL SPACED AND EASY FOR YOU TO READ WILL BE EASIER FOR THE MACHINES TO READ. REMEMBER, THE MACHINES READ 5 FULL ADDRESSES EVERY SECOND AND HAVE TO FIGURE OUT WHAT EACH ADDRESS SAYS IN THAT SAME AMOUNT OF TIME.

And these are not:

THIS TYPE IS TOO SMALL

THIS TYPE IS TOO LARGE

THIS TYPE IS ITALIC

THIS TYPE IS TOO BOLD

This is a script type

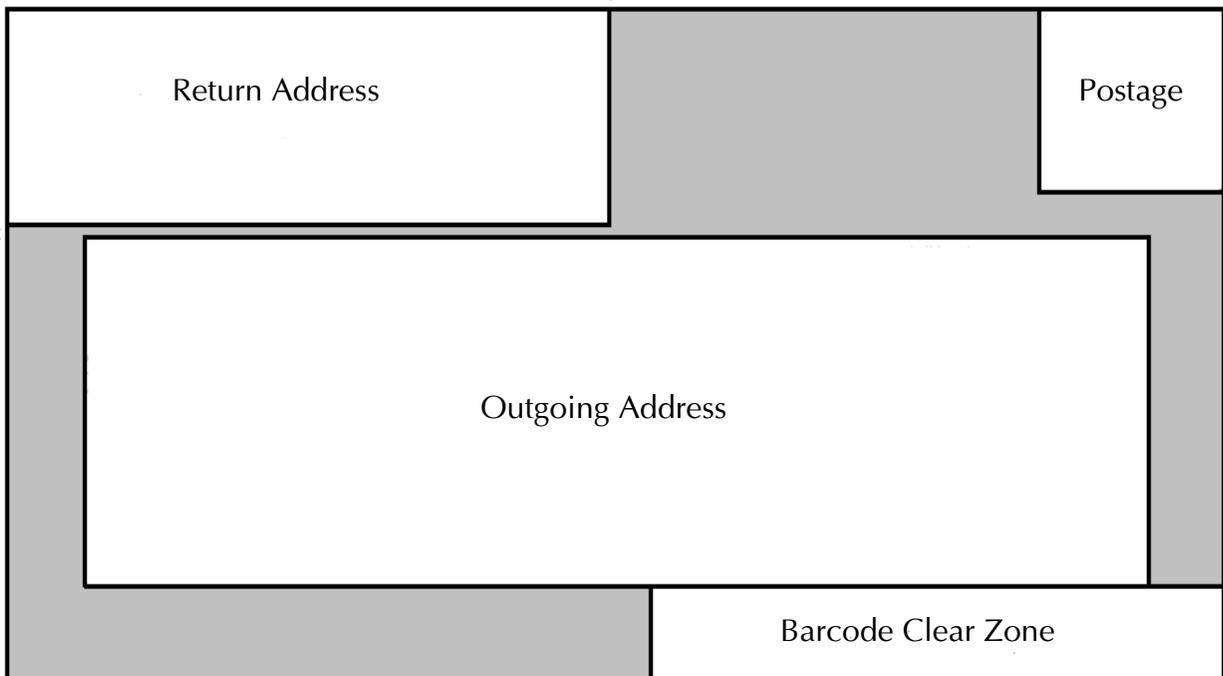
THESE LETTERS TOUCH EACH OTHER

THIS TYPE IS HANDWRITTEN

THIS IS DECORATIVE TYPE

Barcode Clear Zone

Letter Mail Dimensions:		
Dimension	Minimum	Maximum
Height	3.5"	6.125"
Length	5"	11.5"
Thickness	0.007	.25"



The areas shown in white (above) are “reserved” for specific functions. The US Postal Service has automated much of the mail processing. Unlike people, the machines expect certain items to be in certain places. If you put logos, slogans or advertising messages in any of the white spaces (except as part of the return address), your mail may be “non-automated” and can be delayed since it has to be sorted outside the automation process. We have reference material you can provide to your designers and printers to accommodate these clear zones.

Move Update

To participate in postage savings programs of the US Postal Service (like the service Access Mail offers), there is a requirement that you keep the addresses you mail to updated. This involves both proper 5-digit Zip codes and sending to the current address.

There are several methods to comply with the “current address” requirement, all falling under the move update requirements. The basic requirements are that you process each address through an approved method once every 180 days (6 months), and update your files when changes are discovered.

The simplest method, used by a majority of our customers, is to endorse all envelopes with either “Return Service Requested” or “Address Service Requested.”

Return Service Requested will bring your original letter back to you at no additional charge, with a yellow USPS label indicating the new, moved address for the recipient. You need to update your records, keep the envelope or log the date of update, and remail the letter in a new envelope with new postage.

Address Service Requested will forward the original letter to the recipient at the new address, and send you back a change of address postcard, with a charge of \$0.70. Again, you need to keep the card or log the date of update.

A third endorsement, “Change Service Requested,” requires a “key line” above each recipient’s name on all outgoing mail. This gives a unique identification to each letter. When a move is detected, the USPS will return an electronic change of address card (\$0.20) showing the key line. You must be able to correct your records from the key line information. This service requires pre-enrollment before use.

National Change of Address (NCOA) is a service for processing your entire customer/vendor/employee list prior to any mailings, and then once every 180 days. This electronic process returns your database with moved addresses flagged for correction. You download this file and then mail from this database for up to 6 months. Any name that was not processed originally may “ride along” on this list for less than 6 months *if* it came directly from the recipient, i.e. placing an order, new customers, etc. Access Mail offers this service to our customers for a fee.

Since it is to your benefit to have the letters get to the intended recipient as quickly as possible, you will find this requirement is a win-win situation for both the USPS and your company. Each day you sign your pick-up ticket that you are complying with this requirement, so you need to determine the method you will use and then maintain it. We are here to help you if you have any questions, so please call us.



MLOCR PROCESSING ACKNOWLEDGMENT FORM

The collection of information on this Processing Acknowledgement Form (PAF) is required by the Privacy Act of 1974. The United States Postal Service (USPS) requires that each *FASTforward*® licensee have a completed PAF for each of their customers prior to providing the service. The Licensee is also required by the USPS to retain a copy of the completed form for each of its customers and to obtain an updated PAF from each of its customers at minimum once per year. Any signature upon this PAF shall be considered valid for all purposes and have the same effect whether it is an ink-signed original or a photocopy or facsimile representation of the original document.

I, the undersigned, an authorized representative of

Company Name

Address

City/State/ZIP+4

() -
Telephone Number

Tax Identification Number (TIN)

Name (Please print)

Title

/ /

Signature

Date

do hereby acknowledge that I have received and reviewed the *FASTforward* Information Package supplied to me by Access Mail, a *FASTforward* licensee. I also understand that the sole purpose of the *FASTforward* service is to provide mailpiece redirection (via re-addressing) due to customer moves for mailpieces that I have submitted to the licensee for mailing.

FASTforward Licensee

Access Mail Processing Services Inc

Business Name (Please print)

E A Bell

President

Name (Please print)

Title

Signature

08 / 29 / 2002

Date

(727) 539 - 6245

59-1725680

Telephone Number

Tax Identification Number (TIN)

PAF0CR November 2001

Rev. 12/3/2002



FastForward Example

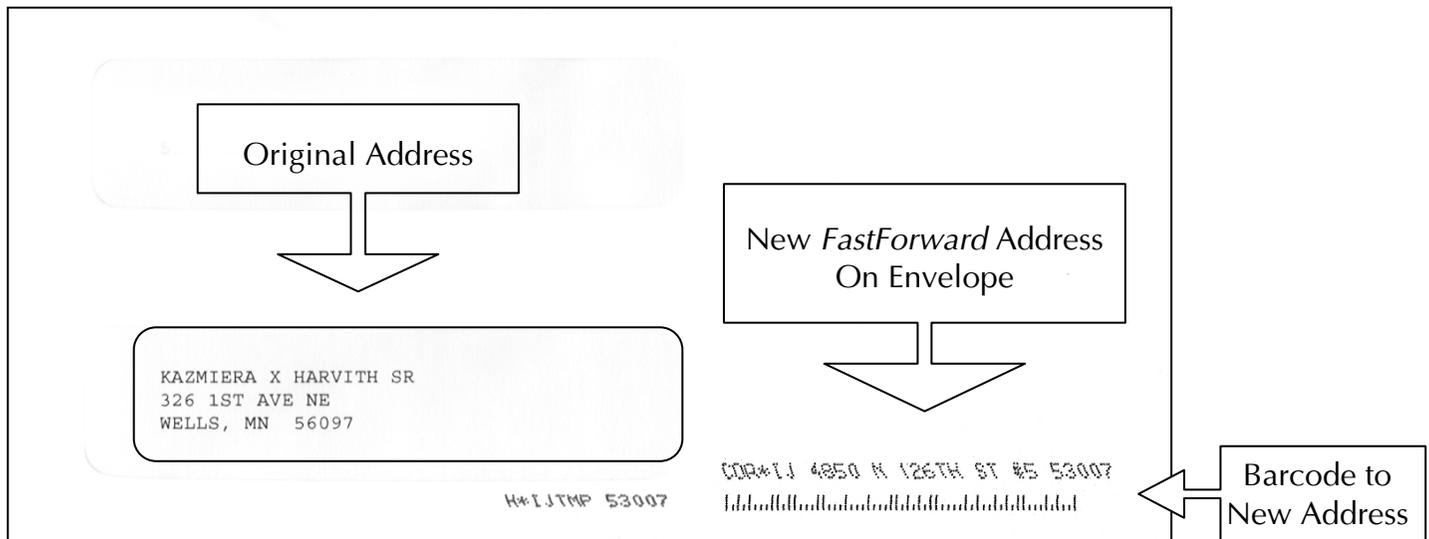
Exciting New Development

Access Mail is the first in the Tampa Bay Area to offer *FastForward*TM (MLOCR) to our customers. This technology upgrade is a joint effort between the USPS and National Association of Presort Mailers to assure your letters get to the recipient as quickly as possible, even if they have recently moved.

Move Update History

Since 1997, the USPS has required mailers who utilize discounted postage rates to use the most current address for their customers, even though they may have moved. Of the available compliance systems, you probably use an endorsement (return service requested or change service requested) to meet this requirement. This process may cost \$5-\$10 or more per returned letter to keep your list updated, not counting any costs from the delay in getting the letter to your customer.

If you use endorsements, you will have to select another method some time in the future. In May 2002, the USPS filed a Federal Register proposal to eliminate endorsements as a way to comply with the move update requirements, leaving only other more costly or inconvenient compliance programs.



FastForward Works

With MLOCR *FastForward*TM:

- ☒ your company will be in 100% compliance with the move update requirements;
- ☒ your customers will get their mail faster; and
- ☒ optionally, you can track change of addresses electronically or have the updated letters returned to you.

With *FastForward*TM, when your letter is read by the MLOCR and the MLOCR determines the correct delivery point barcode, the machine reads the name of the recipient and compares it to a list of people who have filed a change of address. If there is an exact match (100%), the recipient's new address will be printed on the lower right of the envelope, with the new delivery point barcode just below it. The letter then goes directly to the new address.

Without *FastForward*TM, your letter would have been processed to the old address where the letter carrier would have returned it for new addressing. The letter would travel to a change of address center, get a yellow or printed message with the new address and then either be delivered to the new address (up to 2 weeks later) or returned to you for re-enveloping and re-posting, depending on whether you use endorsements.

FastForward Opt Out

TO: ACCESS MAIL PROCESSING SERVICES, INC

RE: OPT OUT OF FASTforward SERVICES

I, the undersigned, an authorized representative of:

Company Name

Address

City, State, Zip

Telephone

Tax ID Number (TIN)

Name

Title

Signature

Date

do hereby acknowledge that I have received and reviewed the FASTforward Information Package supplied to me by Access Mail Processing Services, Inc, a FASTforward licensee.

This company declines participation in FASTforward services provided by Access Mail Processing Services, Inc., and complies with the move update requirements for discounted First Class mail using the following method:

- Ancillary Service Endorsements** (Temp Return Service / Address Service Requested)

A process to update database records with the address information returned from the US Postal Service. It is recommended you keep proof that you have updated your database records on a regular basis.

- National Change of Address (NCOA)**

A licensed vendor performs address matching and move information within 180 days of mailing each address. It is recommended you keep receipts, records and reports on each update.

- Address Change Service (ACS)**

An electronic notification service used with some ancillary endorsements. It requires enrollment in the program and keyline information on the letters mailed. It is recommended you keep proof you have updated your database records on a regular basis.

- FASTforward List Correction Services**

A licensed vendor performs list correction services prior to each mailing, with electronic updates. It is recommended you keep receipts, records and reports on each update.

This form is required as part of our Mail Processing Total Quality Management procedures to ensure all mail we submit to the USPS qualifies for the discount postage rates used in the mailing.



FASTforwardSM Processing Services

Information Sheet

The FASTforwardSM file is a consolidated file of move information that on average contains approximately 16 million permanent Change-of-Address (COA) records filed with the US Postal Service. Each record contains the relocating Postal customer's name along with an old and new address. The old address is the one compared to the address on the customer's mailpiece or facsimile for matching purposes and the new address is the one returned if a match is made, to the mailpiece or facsimile. These records are retained on the file for a six month period from the move effective date.

There are three separate and distinct services that may be provided to a mailer by the FASTforwardSM Licensee. They are as follows:

1. Mailpiece redirection due to customer moves via the Licensee's MLOCR equipment (FASTforwardSM Forwardable Mailpiece Processing option).
2. Non-electronic address correction notification via mailpiece facsimiles submitted by a mailer and processed on the Licensee's MLOCR equipment (FASTforwardSM Mailpiece Facsimile Processing option).
3. Non-electronic address correction notification by return of matched mailpieces via the Licensee's MLOCR equipment (FASTforwardSM Notification via Returned Mailpiece Processing).

The source of the FASTforwardSM data is a permanent Change-of-Address filed by the relocating postal customer. Approximately 40 million of these COAs are filed annually. The database is updated every week with this information.

The new address supplied by the relocating postal customer must be ZIP+4 codeable to qualify for addition to the FASTforwardSM file.

All mailpiece or facsimile addresses submitted by a FASTforwardSM customer are processed by Multiline Accuracy Support System (MASS) certified ZIP+4/DPC Licensee software. However, new address (forwarded to) information is provided only when a FASTforwardSM match to the mailpiece or facsimile name and ZIP+4/DPC coded address is attained.

The provision of Change-of-Address information is controlled by strict name and address matching logic. To make the best use of the FASTforwardSM service, potential customers should understand FASTforwardSM matching logic. All matches made to the FASTforwardSM file require complete address matching logic. Name matching logic is determined by the move type in the data record on the FASTforwardSM file that is the candidate for a match.

Move Types and associated Name Logic are:

1. Individual: Match on first name, middle name or initial, surname and title required. (NOTE: The FASTforwardSM customer/mailer can elect to have only individual match logic utilized regardless of the move type in the record when their mailpieces are processed.)
2. Family: Match on surname only
3. Business: Match on entire business name

The FASTforwardSM file is comprised of approximately 47% family moves, 47% individual moves, and 6% business moves. The typical profile of the new address information contained in the 16 million COA records on the file is as follows:

1. 84.30% are Forwardable moves (contain address information)
2. 12.85% are moved-left-no-address**
3. 02.65% are Post Office Box closed**
4. 00.20% are foreign moves**

A FASTforwardSM updated mailpiece renders the delivery address information that has been originally applied obsolete by providing the new forwarding address for the intended recipient.

Every customer taking advantage of FASTforwardSM services must have completed and returned to the FASTforwardSM Licensee, depending on the type of service desired, the FASTforwardSM MLOCR Processing Acknowledgement form and/or the FASTforwardSM Facsimile Processing Request Form and/or FASTforwardSM Notification via Returned Mailpiece Processing Request Form provided to them by the Licensee.

**The literal "NEW ADDRESS INFORMATION UNKNOWN" is provided in lieu of address information in FASTforwardSM Facsimile and Notification via Returned Mailpiece Processing only.



Short Paid Mail

What is Short Paid mail?

The presort postage rates are currently \$.371 for up to the first ounce, and then an additional \$.23 for each additional ounce. If you don't apply enough postage for the proper weight, the letter is considered "short paid."

How does this happen?

When you process your mail, usually under a deadline, it is common practice to make an educated guess of the mail's weight, weighing only a few pieces. When the USPS clerk checks the weight of the mail, they use a scale that weighs to 3 decimal places for accuracy.

Why does the the Post Office care?

The USPS has determined that many mailers are not paying the proper postage rates for additional ounces. Since this is lost revenue that is due, they are looking closely at this problem. When you use a presorter, we are held financially responsible for this problem.

What do they do to find Short Paid mail?

Each day, MERLIN is presented with approximately 1,000 letters from our mailing. Each piece is weighed and the weight is compared to the postage on the piece. If the postage is deficit, MERLIN determines the percentage of mail that is short paid and calculates the additional postage needed to correct the mail.

Who pays?

In order to clear the mail, Access Mail pays for your short paid pieces that evening. We charge the individual customer for these short paid pieces. We will provide a copy of the USPS verification form with the calculations and postage due amount. For your protection, the USPS gives us short paid pieces and we also weigh verify them on our scale. We return them to you the following day with a "neon" calculation sheet.

What can we do?

First, check the accuracy of your scale. Second, weigh every piece of mail and apply the correct postage amount. Most often, the problem is with pieces of mail that weigh exactly on the ounce. Remember, the postage requirement is for an additional \$.23 if it "exceeds" the ounce, even by ".001."

If you are a mid-size mailer, you may want to check out the newer mailing machines that automatically weigh each piece of mail and then apply the correct postage. It could be worth the extra cost in employee's time and short paid penalties.

Loop Mail

What is Loop Mail?

As barcoding technology "advances," new challenges develop. One of the most common is "Loop Mail," which happens when the barcode sprayed on your outgoing envelope is actually the barcode for your own company. A few days after sending a letter out, there it is in your incoming mail.

Why does this happen?

When an envelope passes in front of a Multi-Line Optical Character Reader (MLOCR) optic system, it is scanned from left to right, bottom to top. The camera is looking for a readable address anywhere in an 11.5" wide, 3.5" tall area. The camera will read the most legible, readable address within this area. If it can't read the outgoing address (handwritten, italic, proportional type, etc.) and your return address is within this area and can be read by the MLOCR, it will not be able to tell the difference and will barcode the mail to your return address. Once this happens, the letter will continue to be sent to the barcoded location (your company), no matter how many times you send it out.

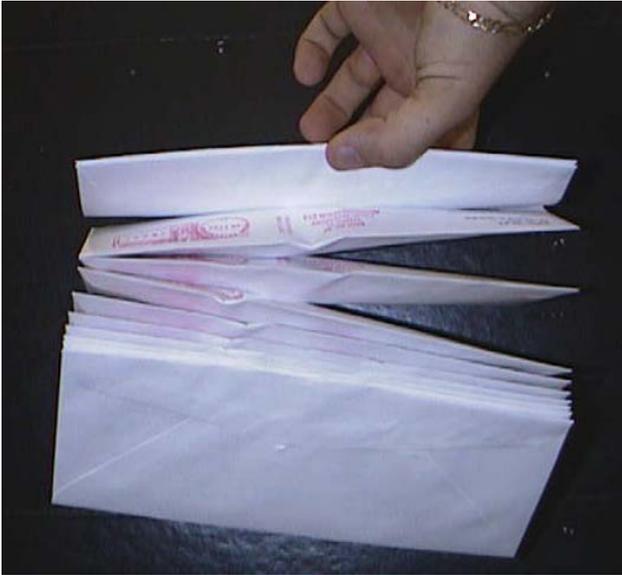
What can I do with a Loop Letter?

Once it has come back to you, just use a black marker and run a line horizontally through the barcode. This will prevent an MLOCR from reading the barcode and it will be sent to a hand sort area. However, unless you make a permanent change to the envelope, you will keep getting your own mail back.

How can I Break the Loop?

There are two choices, both involving artwork changes on your envelope next time it is printed. Either move the return address so it is above the 3.5" read area or alter the type style/size to make it non-machine readable. This can include making it smaller, larger, proportional or italic.

“Stuck” Envelopes



It is very important to seal all envelopes before mailing. However, you need to take care that the envelopes don't "stick" together in the trays. If mail comes in to Access Mail that is "stuck" together, it cannot be processed until it is manually separated, normally the next business day.

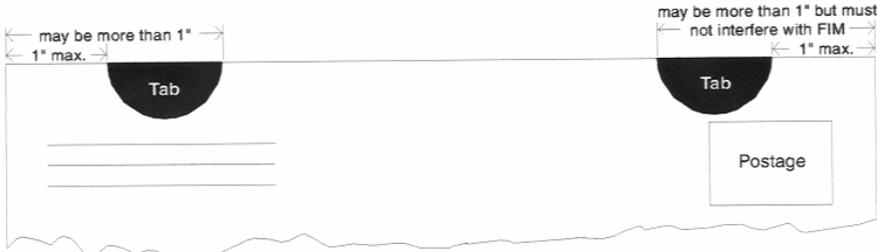
To prevent envelopes sticking together, please follow these suggestions:

- Don't overfill the mail trays, this "jams" the envelopes together and they will stick.
- Check your water/solution levels. Your operator's manual can show you how to adjust the amount of water used to seal each envelope.
- Fan the envelopes when they come off the meter/conveyor. Hold a handful with your right hand at the right edge and use your left hand to separate all the envelopes before you put the handful into the mail tray.
- Spot check the envelopes to make sure they are not sticking together.



Tabs & Wafer Seals

Placement of Tabs and Wafer Seals



Specifications for Automation-Compatible Letter-Size Mailpieces

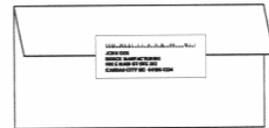
Double Postcard Size

Tabs 1 (middle)
Fold Top or Bottom
Sheets Single
Basis Weight 75 lb.



Folded Self-Mailer (Invitation Fold)

Tab Address Label
Folds Top and Bottom
Sheets Multiple or Single
Basis Weight 20 lb.



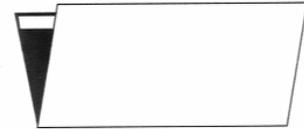
Folded Self-Mailer (Invitation Fold)

Tabs 2 (start ≤ 1 inch from edges)
Folds Top and Bottom
Sheets Single
Basis Weight 20 lb.



Folded Self-Mailer (Continuous Glue Strip)

Glue Strip Top Edge
Fold Bottom
Sheets Single
Basis Weight 20 lb.



Folded Self-Mailer

Tabs 2 (start ≤ 1 inch from edges)
Fold Top or Bottom
Sheets Single
Basis Weight 20 lb.



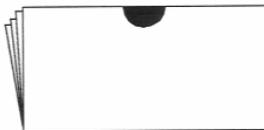
Booklet

Tabs 2 (start ≤ 1 inch from edges)
Spine Bottom
Sheets Multiple with Cover
Basis Weight 20 lb. (Cover)



Folded Self-Mailer

Tabs 1 (middle)
Fold Bottom
Sheets Multiple
Basis Weight 24 lb.



Folded Booklet

Tabs 2 (start ≤ 1 inch from edges)
Spine Top
Fold Bottom
Sheets Multiple with Cover
Basis Weight 20 lb. (Cover)



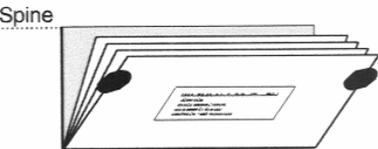
Folded Self-Mailer

Tabs 1 (middle)
Fold Bottom
Sheets Single
Basis Weight 28 lb.



Folded Booklet

Tabs 2 (start ≤ 1 inch from top edge)
Spine Top
Fold Bottom
Sheets Multiple with Cover
Basis Weight 20 lb. (Cover)



Folded Self-Mailer

Tabs 1 (middle)
Fold Right
Sheets Single
Basis Weight 75 lb.



Booklet

Tabs 2 (start ≤ 1 inch from top and bottom edges)
Spine Right
Sheets Multiple with Cover
Basis Weight 24 lb. (Cover)



DMM © USPS, January 10, 1999

US Postal Service



This section details some USPS forms that are necessary for you to participate in our Postage Discount programs.

Also included is information and meetings the USPS provides to help you get the best service for your money.

USPS VAR Form 8096

- On the next page is USPS form 8096, which informs you, as a mailer, that our company, as a consolidator of letters, may receive a postage refund from the USPS on your mail. It is simply your acknowledgement that we have informed you of this and you agree. This is the process we use to help defray processing costs to you, which is why we can offer our services with little or no fees.
- This form must be signed and submitted with your first discounted mail. The USPS keeps the original copy in the Tampa Post Office.

Form 8096

REQUEST TO PAY POSTAGE REFUNDS TO PRESENTER OF MAIL

(Name of customer)

(Hereinafter "the customer") hereby requests the United States Postal Service to accept requests for postage refunds submitted by Access Mail Processing Services, Inc (hereinafter "the presenter") for postage refunds on the mail of the customer and to pay refunds found to be due on such mail to the presenter, as specified below.

1. This request applies to all mail of the customer, and on which the customer has paid postage, that is deposited with the Postal Service by the presenter. This request does not apply to mail that is deposited with the Postal Service by persons or entities other than the presenter.

2. For all mail covered by this request the presenter shall have exclusive authority to submit to the Postal Service request for postage refunds, and to receive payment of any such refunds that are determined to be owing because the amount of postage applied to the mail by the customer is in excess of the lawful rate or rates of postage applicable to that mail at the time it is deposited with the Postal Service by the presenter. Requests for refunds on such mail may be submitted only at the time of mailing, in accordance with the procedures established in the *Domestic Mail Manual*.

3. The Postal Service assumes no responsibility for maintaining records on the amount of refunds paid to the presenter pursuant to this request, or for the eventual disposition of any such refunds between the customer and the presenter. These are matters of private contractual agreement between the presenter and the customer.

4. This request will remain in force until the Postal Service receives written notification from the customer that this request is revoked.

5. The submission of this request is not required by the Postal Service for the deposit of the customer's mail. This request will, however, permit the Postal Service to accept requests for refunds, made by the presenter on behalf of the customer, pursuant to a voluntary agreement between the customer and the presenter.

I, _____
(Name)

(Title)

am duly authorized to act on behalf of the customer in making this request, and agree to all terms and conditions of this request on behalf of the customer.

Signature and date

WARNING: The furnishing of false information on this form may result in a fine of not more than \$10,000 or imprisonment of not more than 5 years, or both. (18 U.S.C. 1001)



USPS Option 4

- The US Postal Service's Option 4 program allows Access Mail to enter mail metered in other cities at the SCF Postal facility located in Tampa, without any customer-applied drop shipment markings.
- Under this program, it is necessary to ensure that all our customers are aware that their mail is being dropped at the Tampa SCF facility. This procedure should not in any way affect your mail, it is only an approval process required by the Postal Service. Although USPS delivery standards will not be altered, the Postal Service has required us to state that *"the consolidation of your mail may influence delivery performance."*
- It is important that we have your current meter number. This is the number that prints under the postage/city, state information. ***When you change meters for any reason, please let us know.*** In order to keep our Option 4 valid, we must provide current and correct meter listings for our customers on a daily basis.
- Please review the enclosed copy of the authorization granted to Access Mail and the copy of the Option 4 requirements attached.
- Please sign and date the acknowledgement attached.
- Should you have any questions regarding this subject, please do not hesitate to contact us.

Access Mail Processing Services
14240 62nd St N
Clearwater FL 33760-2717

This is in response to your request to consolidate First-Class metered mail, apply a Delivery Point barcode, and drop ship it without a drop shipment endorsement at the Tampa, Florida, Post Office.

Your request is approved under Section 144.85 (option 4) of the Domestic Mail Manual, under the following conditions;

1. This authorization (authorization #4012) pertains only to the meters listed in your request which are listed on attachment "A".
2. The majority of the mail consolidated must be prepared as a single mailing (on one mailing statement) in which all pieces regardless of rate claimed bear a correct Delivery Point Barcode.
3. Documentation to support the barcoded rate is provided in accordance with Sections 564.6 or 364.3, DMM.
4. You must give written notice to the licensee whose mail is to be consolidated for mailing under this authorization. That notice must include a copy of this authorization, a full explanation of the applicable preparation requirements, and notice that consolidation of their mail may affect service. A copy of this notice must be provided also to the entry post office and licensing office postmaster.
5. Your customer will date every mailpiece with the date you mutually agree will be the date the mail is to be entered at the Tampa Post Office. The date utilized must be acceptable to the Postal service, and in accordance with Section 144.47, DMM.
6. The date reflected on the mailpieces will be the date the Postal Service is able to process and meet critical entry times.
7. Re-metering of dates is not to be standard operating procedures, but used only as a last resort in those instances, and on those days when processing problems result in a failure to meet the established entry times.
8. You may not shift any of this mail to another mailer or consolidator for processing or entry.
9. The service standard for mail deposited under this arrangement must be the same or better than the applicable service standards which would have applied had the mail been entered at the licensing post office.
10. All remaining provisions of Section 144.85 are to be followed.
11. We must be advised of future customers who you wish to include under this authorization.

This authorization is subject to revocation if the guidelines contained in this letter are not followed, or for reasons contained in Section 144-817, DMM. The Manager of Bulk Mail Entry in Tampa, Florida, is advised that a review must be conducted of your operations no later than 90 days after the date of this authorization to ensure compliance. A report of these findings are to be forwarded to this office. At this time extended approval will be considered.

Sincerely,

{sig}

Edward S. Walker

Manager

Rates and Classification Service Center

BCC: Manager, Customer Services, Tampa District

Manager, Bulk Mail Entry, Tampa FL

Classification Support Specialist, Tampa FL

RCSC40 (RF)

R. Wayne Graves

RCSC40: RWGraves:ap:38165-9599 (Case #298172 -SPRO)



DMM D072.6.0: Consolidated Drop Shipment

6.0 OPTION 4: CONSOLIDATED DROP SHIPMENT WITHOUT ENDORSEMENT

General 6.1	A mailer (the party presenting a consolidated mailing to the USPS) may apply to collect metered matter bearing postage from meters licensed at different post offices and consolidate that matter for deposit at other entry post offices within that area, subject to the conditions and limitations in 6.0.
Barcoded and Nonbarcoded Portions 6.2	The majority of the mail consolidated for entry under Option 4 must be prepared in a single mailing (with a single postage statement) in which all pieces, regardless of rate claimed, have the correct barcode (ZIP+4 for flats, delivery point for letters and cards) and are physically compatible with automated mail processing equipment. The entry post office may reject a mailing if all pieces do not have the correct barcode. A minor portion of the consolidated mail may be prepared as a second, separate mailing (with its own postage statement) in which the pieces do not bear the correct barcode (or are not compatible with automated processing equipment) but do meet the standards that apply to the rates claimed.
Service Objective 6.3	When a mailpiece is part of a consolidated mailing, the service objective that applies must be the same as or better than that which would have applied had the piece been entered at the licensing post office. As part of the application, documentation must be provided by the mailer to show compliance with this standard to USPS satisfaction. (Typical documentation lists the service objective that applies to each pair of origin/destination 3-digit ZIP Codes in the consolidated mailing, both if entered at the licensing post office and if entered as authorized under Option 4.)
Information 6.4	An application under Option 4 must be submitted by the mailer (i.e., the party to present the consolidated mailing to the USPS). The information in 2.0 must be provided for each post office at which mail is to be entered under Option 4. The application must also detail: the meter licensees whose mail is to be consolidated and the serial numbers of each licensee's meters; the mailer's method of sortation, documentation, and quality control; and the mailer's procedures for ensuring that all pieces in the consolidated mailing are entered to meet or exceed the service objectives for the place of origin.
Notice to Licensees 6.5	After receiving the authorization notice, the mailer must give written notice to each licensee whose mail is to be consolidated under the authorization. The mailer's notice must include a copy of the authorization, a full explanation of preparation requirements, and a reminder that consolidation of their mail can adversely affect service. The mailer must give copies of each licensee notice to the entry office and licensing office postmasters.
Additional Standards 6.6	Metered mail deposited under Option 4 must be prepared in segments for entry at postal facilities according to schemes and schedules provided by the USPS. Further, each segment must be prepared for dispatch without additional postal processing or handling, and deposited at places and times specified by the USPS. The USPS may stipulate preparation beyond that required to qualify for the rate paid for the mail. Failure to meet these standards can lead to revocation of the authorization.
Transportation 6.7	The mailer must provide transportation for the consolidated mailing, unless the USPS provides plant load service.
Endorsement 6.8	A drop shipment endorsement is not required on pieces mailed under Option 4.
Preparation 6.9	The preparation and documentation standards that apply to the rates claimed in the mailing remain unaffected by entry under Option 4.
Consolidation 6.10	Mail collected from licensees for mailing under Option 4 may not be further collected or consolidated by any other mailer or consolidator.
Documentation 6.11	The mailer/consolidator must keep documentation supporting each consolidated mailing, including the volume collected from each meter licensee, for at least 1 year from the date of mailing, and make it available for postal inspection on request.



Postal Customer Council

The Postal Customer Council is an association of business mailers and postal managers, working together to increase mailing efficiency and improve mail service. The main purpose of PCC is to strengthen the working relationship between the US Postal Service and its customers. Currently, there are over 300 councils with over 300,000 active members across the nation.

Through regular meetings, educational seminars, special events and clinics, PCC members stay on top of the latest postal developments and work closely with local post offices to make mail service more efficient. The US Postal Service stands behind the PCC program, an important avenue for improving service and understanding mailers' needs.

The Postal Service supplies speakers and resources for PCC member programs. Each PCC has an industry co-chair and a postal co-chair, with a governing board. The meetings are scheduled under board direction, with special meetings to meet the local area needs. Both mailers and local vendors can maintain membership. Local postmasters are usually in attendance at the regular meetings.

There are no fees to join the PCC. Many of the meetings include a luncheon and there are fees for these meetings to cover the costs. Special events such as an all-day training seminar may have their own fees.

PCC members often receive special discounts at the National Postal Forum, held semi-annually in various US locations.

To join your local PCC, fill out the form on the next page and mail it to the following address:

Manasota Postal Customer Council (Manatee & Sarasota Counties)

PO Box 48454, Sarasota, FL 34230-5454

Tampa Postal Customer Council (Hillsborough County)

PO Box 23262, Tampa FL 33623-3262

Pinellas Postal Customer Council (Pinellas County)

PO Box 10732, St Petersburg FL 33733-0732

Or fax the form to Access Mail at 727-531-5353 and we will direct it to the correct council for your address.



Postal Customer Council

To join your local PCC, fill out this form and mail it to the following address:

Manasota Postal Customer Council (Manatee & Sarasota Counties)

PO Box 48454, Sarasota, FL 34230-5454

Tampa Postal Customer Council (Hillsborough County)

PO Box 23262, Tampa FL 33623-3262

Pinellas Postal Customer Council (Pinellas County)

PO Box 10732, St Petersburg FL 33733-0732

Or fax this form to Access Mail at 727-531-5353 and we will direct it to the correct council for your address.

Name _____

Company _____

Address _____

City / State / ZIP _____

Business Phone __ () _____ Ext. _____

Fax __ () _____

Email _____ @ _____

