

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

Before Commissioners:

Ruth Y. Goldway, Chairman;  
Tony L. Hammond, Vice Chairman;  
Mark Acton;  
Dan G. Blair; and  
Nanci E. Langley

Modification of Mail Classification Schedule  
Regarding Address Management Services

Docket No. MC2010-25

ORDER APPROVING  
CLASSIFICATION CHANGES RELATED TO  
ADDRESS MANAGEMENT SERVICES

(Issued July 16, 2010)

On July 2, 2010, the Postal Service filed a notice pursuant to 39 CFR 3020.90 and 3020.91 concerning two classification changes to Address Management Services.<sup>1</sup> The Commission approves the classification changes specified in the Postal Service's Notice and shall make conforming modifications to the draft Mail Classification Schedule.

*Description of classification changes.* The first change removes "Delivery Type" service from the list of services included within Address Management Services. The Postal Service states that this service is limited, outdated, and not widely used. In

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<sup>1</sup> Notice of the United States Postal Service of Classification Changes Related to Address Management Services, July 2, 2010 (Notice).

addition, it indicates that more extensive and up-to-date information may be obtained through other services. *Id.* at 1.

The second change removes the specifications as to how information is provided to customers for CRIS Route, City State, Delivery Statistics, eLOT, 5-Digit ZIP, Official National Zone Charge, Z4 Change, ZIP+4, ZIP Move, AMS API, and TIGER ZIP+4 services. Currently, CD-ROM, DVD, and disc are specified. *Id.* at 2. The Postal Service states that removing the specifications will allow it to provide information by any appropriate means. *Id.*

The Postal Service intends to offer Delivery Type service subscriptions through September 30, 2010, and honor subscriptions until they expire. *Id.* The change to remove the specifications as to how information is provided to customers may be made no earlier than July 17, 2010.

*Procedural history.* In Order No. 483, the Commission established Docket No. MC2010-25 for consideration of matters identified in the Postal Service's Notice; appointed an officer of the Commission (Public Representative) to represent the interests of the general public; established a deadline for interested persons to comment; and arranged for notice of this docket to appear in the *Federal Register*.<sup>2</sup>

*Comments.* Comments were filed by the Public Representative.<sup>3</sup> No other interested person submitted comments. While not opposing the Address Management Services classification changes proposed by the Postal Service, the Public Representative challenges whether the proposal to remove Delivery Type as a service offering was appropriately filed under the procedures of 39 CFR 3020.90-91 (provisions for making corrections to the Mail Classification Schedule). The Public Representative suggests that the elimination of Delivery Type as a service offering involves a change in

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<sup>2</sup> Notice and Order Concerning Classification Changes Related to Address Management Services, July 6, 2010 (Order No. 483).

<sup>3</sup> Comments of the Public Representative in Response to Order No. 483, July 13, 2010 (Public Representative Comments).

the market dominant product list that should have been filed under the provisions of 39 CFR part 3020 involving modifications to the product lists. *Id.* at 2.

The Postal Service filed a reply to the Public Representative's comments which argues that it has filed its Notice under the appropriate section of the Commission's rules.<sup>4</sup> It notes that the Address Management Services now appearing on the product list is being preserved. Furthermore, because Delivery Type services will continue to be offered through other components of the product, the proposal does not change the nature of the service to such an extent that it effectively creates a new product or eliminates an existing product. *Id.* at 2, citing Order No. 26 at 97.

*Commission analysis.* The Public Representative's comments identify a valid concern, namely the appropriate section of code to apply for relatively minor changes. For this Notice, the possibilities include filing under sections 3020.90 *et seq.* (corrections to descriptions in the Mail Classification Schedule), sections 3020.30 *et seq.* (changes in the product lists), or sections 3010.10 *et seq.* (rate adjustments of general applicability).

The Commission determines whether a proposal is filed under the appropriate provisions of the code based upon the facts presented in each case. The Commission has the option of directing the Postal Service to refile its Notice under a more appropriate provision of the code, or requesting the Postal Service to provide additional information to account for any deficiencies.

The Public Representative contends that the Postal Service's request should have been filed under the provisions for changes to the product lists. In this instance, the Commission finds the proposed classification changes to be minor in nature, not requiring the more substantial filing requirements of rule 3020.30 *et seq.* The changes do not directly involve a change to the product list. Delivery Type is a component of the Address Management Services product appearing on the market dominant product list.

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<sup>4</sup> Reply of the United States Postal Service to Comments of the Public Representative in Response to Order No. 483, July 14, 2010.

Delivery Type itself does not appear on the product list, nor is a request being made to add this service to the product list.

The more substantial filing requirements of rule 3010.10 *et seq.* (rate adjustments of general applicability) also are not required in this instance. Although Delivery Type service will be eliminated, the Notice does not propose price changes to the remaining components of Address Management Services. Moreover, current Delivery Type users have the option of purchasing Address Information Service (AIS) Viewer service at no change in price, or enhanced services at a nominal increase in price. Under the circumstances, therefore, the Commission concludes that the Postal Service has appropriately filed under sections 3020.90 *et seq.* (corrections to descriptions in the Mail Classification Schedule).

The Commission received no objections to the Postal Service's proposals.

Only 19 customers currently subscribe to Delivery Type service. Eliminating the service will have a limited impact on mailers given the availability of other options providing similar service. Allowing the Postal Service and customers the option of determining the best method of communicating data for CRIS Route, City State, Delivery Statistics, eLOT, 5-Digit ZIP, Official National Zone Charge, Z4 Change, ZIP+4, ZIP Move, AMS API, and TIGER ZIP+4 services is beneficial in that it provides both customers and the Postal Service with additional flexibility. The Postal Service's classification requests are approved.

*It is ordered:*

The Commission approves the classification changes specified in the Postal Service's Notice, and shall make conforming modifications to the draft Mail Classification Schedule.

By the Commission.

Shoshana M. Grove  
Secretary