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USPS-RT-18

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

Postal Rate and Fee Changes, 1997

Docket No. R97-1

REBUTTAL TESTIMONY
OF
MICHAEL MURPHY
ON BEHALF OF
UNITED STATES POSTAL SERVICE

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AUTOBIOGRAPHICAL SKETCH

My name is Michael Murphy, I am currently the Manager of the Office of Address Management at United States Postal Service Headquarters and the United States Postal Service's National Customer Support Center (NCSC) located in Memphis, TN. I testified before this Commission In Docket No. MC95-1.

My current responsibilities include providing policy and support for all aspects of USPS address management, including development and operational support for address information systems, products, services, address quality improvement and customer support programs. I provide technical guidance in all areas of address technology management and have extensive experience in the implementation and support of computer-based information systems. I actively participate in and frequently speak at mailing industry association meetings, National Postal Forums and the Mailers' Technical Advisory Committee (MTAC). I am a featured speaker at Postal Customer Council sessions, on such subjects as address quality and Move Update services which can assist large and small mailers in managing their address files and/or improving their mailing operations. In 1988, I established "Partners in Tomorrow," a representative work group of vendors and mailers who meet several times a year to establish quality and performance goals for commercial address-matching programs.

The National Customer Support Center plays a major role in the development and implementation of programs and services to support the Postal Service's goals for customer service and automation. See Appendix I for a description of services of the

1 National Customer Service Center. In the past ten years, we have spent a great deal of
2 time in many different mailing industry worksharing groups in joint development of
3 solutions for problems related to address quality and change-of-address updates. This
4 effort is truly a "work in progress," as we jointly strive to raise the quality standards for
5 both the industry and the Postal Service.

6 While in the Postal Service, I have held various training, finance, mail
7 processing, information systems, and delivery positions at the field, regional and
8 headquarters levels. My background includes 23 years with the Postal Service, 9 years
9 in the private sector, and 5 years in the US Navy Submarine Service. In the private
10 sector, I was employed as a field and staff computer engineer with Control Data
11 Corporation. During a 2 1/2 year hiatus from the Postal Service, I founded and
12 managed a successful computer company, COMP-U-TYME Systems.

1 **I. PURPOSE OF TESTIMONY**

2 The purpose of my testimony is to rebut the testimony of the National
3 Association of Presort Mailers (NAPM) witness MacHarg concerning the potential for
4 the recently mandated Move Update requirements to reduce forwarding costs for
5 workshared First-Class Mail in the test year.

6 Mr. MacHarg testified that there will be at least a 25 percent reduction in the
7 costs of forwarding for First-Class presort or worksharing mail due to the newly
8 implemented Move Update requirements for FY 1998, Tr. 27/14956-57. I believe that
9 currently there is insufficient information, little experience and no validated operational
10 numbers to support this claim. It would be extremely optimistic to expect such a large
11 reduction so soon. Below, I describe the Move Update requirements, their
12 implementation, and the reasons for caution in estimating the savings to be expected
13 for the current fiscal year. These reasons, which I discuss more fully below, are:

- 14 • The delays in implementing the Move Update requirements and the exemptions
15 granted after the implementation have certainly reduced the potential savings for
16 this fiscal year. This is particularly true in the commercial MLOCR presort mail
17 stream where the FASTforward_{SM} option was the Move Update tool of choice. Due
18 to technical and operational difficulties, approximately 87 commercial MLOCRs still
19 are waiting for FASTforward_{SM} licensing and operational use.
- 20 • First-Class worksharing mail was experiencing some impact by existing Move
21 Update tools before utilization of such tools was required as a result of classification
22 reform. While perhaps new for NAPM members and not aggressively utilized by all

1 of the industry, the use of existing Move Update tools was growing each year and
2 was not a totally new concept for many First-Class bulk mailers.

- 3 • The reduction in both operational cost and mail volume related to forwarding that is
4 achievable by FASTforward and the increased use of other Move Update tools is
5 likely to be significant in the long run, but it is premature to estimate its efficacy
6 today.

7 8 **II. MOVE UPDATE REQUIREMENTS**

9 Because the American public is very mobile, Move Update requirements are an
10 important component of our program to improve address quality. Each year
11 approximately 40 million permanent Change of Address orders (COA) are filed with the
12 Postal Service. Due to the magnitude of these COAs, the Postal Service has created
13 an infrastructure that is dedicated to attempting to affect delivery for mail that must be
14 re-routed because the addressee has moved. The FY 1993 estimated annual volume
15 of Undeliverable-As-Addressed (UAA) mail was 4.8 billion pieces. Of that amount, 51
16 percent is estimated to be First-Class Mail.¹ Handling this re-routed mail is costly for
17 the Postal Service, since each additional UAA mail piece costs \$0.2432.² UAA mail
18 also creates the likelihood of delivery service delays for mailers and their customers.
19 Thus, improving customer service and reducing costs associated with UAA mail are
20 important needs for the Postal Service and its First-Class Mail business customers.

¹ Docket No. MC95-1, USPS-LR-MCR-76, Section 4.2. UAA mail is either forwarded, returned or treated as waste.

² This is a weighted average of the additional cost of handling mail pieces which are either forwarded, returned or treated as waste. See Docket No. MC95-1, USPS-LR-MCR-76, Section 4.2.

1 These two key business reasons provide the basis for the Move Update requirements
2 for bulk First-Class Mail, which were adopted as a part of classification reform.

3 In order to qualify for First-Class presort and automation rate discounts, mailers
4 must reflect (update) recent COA activity within 180 days (6 months) prior to the date of
5 the mailing, using one of five methods approved by the USPS:

- 6 1. endorse each piece using Address Service Requested or Return Service
7 Requested, or
8
- 9 2. participate in Address Change Service (ACS), or
10
- 11 3. process their electronic mailing list using the National Change of Address
12 [NCOA] service provided by commercial vendors licensed by the Postal
13 Service, or
14
- 15 4. process mail via a presort bureau licensed to provide the FASTforward for
16 Multiline Optical Character Reader (MLOCR) and Remote Video Encoding
17 (RVE) service, or process an electronic mailing list using the FASTforward
18 for Mailing List Correction (MLC), or
19
- 20 5. mailers who state that their addresses are up-to-date and at least as
21 accurate as Postal Service addresses can apply for approval to process
22 their addresses under a 99% rule (also called 1% Move Accuracy). This
23 option allows mailers to demonstrate that they have an existing Move
24 Update program that maintains a less than 1% move rate in their mailing
25 system. If they meet the 99% rule, then they are exempt from the Move
26 Update requirement for 1 year.

27
28 A more detailed description of each option is contained in Appendix I.

29 30 **III. IMPLEMENTATION OF THE MOVE UPDATE REQUIREMENTS**

31 The Move Update requirements, as defined in classification reform, would have
32 been implemented in July, 1996. Implementation was delayed across-the-board until
33 July, 1997. This delay was granted to allow mailers time to evaluate and implement
34 the most effective Move Update option for their mail. Subsequent to July 1, 1997, that

1 segment of the Multiline Optical Character Reader (MLOCR) presort industry which had
2 elected to use FASTforward as its vehicle to meet the Move Update requirements was
3 granted an extension to October 30, 1997. This additional extension was based on
4 technical complexities and equipment modifications encountered by MLOCR
5 manufacturers.

6
7 **IV. MAILER USE OF MOVE UPDATE TOOLS PRIOR TO IMPLEMENTING THE**
8 **MOVE UPDATE REQUIREMENTS**
9

10 In making his projection of a 25 percent decline in forwarding associated with
11 workshared First-Class Mail which he attributes to the mandatory implementation of the
12 Move Update requirements, Mr. MacHarg does not take into account the degree to
13 which bulk mailers were already employing these tools. Mr. MacHarg testified that
14 presort bureau mailings for First-Class presort were prepared without using any Move
15 Update approach prior to the mandatory requirements, and that he did not have
16 information on the Move Update practices of other mailers of bulk First-Class Mail.³

17 With the exception of FASTforward, the other Move Update options -- NCOA,
18 ACS, and endorsements -- have been in place for years. NCOA has been available
19 since 1986, and ACS since 1985. Coupled with the endorsement option, records show
20 these programs have increasingly been employed by mailers prior to the mandatory
21 implementation of the Move Update requirements. In Exhibit USPS-RT-18A, one can
22 see the incremental growth of the ACS in total. In Exhibit USPS-RT-18C, ACS volumes

³ See Tr. 27/14977 where Mr. MacHarg indicates "I don't have the inside to the presorters that do it via list."

1 are provided for First-Class Mail. Exhibit USPS-RT-18B shows the incremental growth
2 of the NCOA program, including the volumes for which addresses have been updated
3 to reflect moves. The main evidence of mailers' use of the Move Update tools in FY
4 1996 is that NCOA licensees processed over 62 billion addresses and matched
5 (provided new address information) 4.7% of this figure for use in mailings for all
6 classes. The NCOA data are not collected by class, but it is my observation that
7 workshared First-Class Mail has long made significant use of NCOA.

8 It is common business practice for First-Class mailers to make address
9 correction notations when change of address information is provided directly by their
10 customers. Indeed, mailers such as utility companies have as much as or more current
11 address information than the Postal Service.⁴

12 The use of NCOA, ACS, and ACR, by workshared First-Class Mail definitely
13 began before the mandatory requirements of classification reform. Many mailers of
14 bulk First-Class Mail maintain very accurate address information based on their own
15 interaction with their customers. Therefore, it is extremely difficult to measure, in the
16 short term, without full industry compliance, the impact of the Move Update
17 requirements on forwarding and other UAA volumes.

⁴ These mailers comply with Move Update requirements by using the fifth option listed above in part II, which is the 1% Move Accuracy test.

1 **V. WITNESS MACHARG OVERSTATES THE EFFECTIVENESS OF MOVE**
2 **UPDATE REQUIREMENTS**
3

4 Mr. MacHarg both underestimates the difficulty of reducing UAA volumes and
5 overstates the effectiveness of the FASTforward system and other Move Update
6 alternatives. At Tr. 27/14956, lines 21 to 23, he claims that volumes processed through
7 FASTforward will “be free of most all forwarding costs to the USPS.” He also says (at
8 Tr. 27/14957, lines 2 to 5), that the other Move Update alternatives, aside from
9 FASTforward, eliminate all but the first forward.⁵

10 It is important to remember that no Move Update method we have developed can
11 eliminate all UAAs. Periodicals mailers have long been strong supporters and users of
12 the Move Update tools. It is noteworthy that despite their extensive use of ACS, NCOA
13 and other alternatives, Periodicals mailers are still faced with a 2 percent UAA
14 problem.⁶ This is mostly due to incomplete and inaccurate addresses. These
15 incomplete and inaccurate addresses result in undeliverable pieces which are marked
16 *return to sender, no such number, no such street, or attempted not known*. If the
17 address cannot be validated or matched to the USPS ZIP+4 directory, then it cannot
18 become a candidate for NCOA or FASTforward processing, and no new address can
19 be assigned or applied to the mail piece. Also, as discussed below, COA orders can
20 only be used to update addresses via Move Update methods if the address contains
21 the exact name(s) and/or family name associated with the COA. The UAA percentage

⁵Specifically he says (at Tr. 27/14957, lines 2 to 5): “[A]lthough such Move Update procedures other than FASTforward do not avoid the need of the USPS to forward an UAA mailpiece the first time, such Move Update procedures should result in additional substantial reductions in the number of mail pieces which need to be forwarded by the USPS.”

⁶ Docket No. MC95-1, USPS-LR-MCR-76, Section 4.2.

1 of 2.69 percent for First-Class Mail⁷ attests that certain segments of the First-Class Mail
2 stream have also worked hard to get UAA volumes down. But the experience of
3 Periodicals mailers suggests the difficulties facing First-Class Mailers in attempting to
4 achieve further reductions of UAA volumes.

5 It is important to note that FASTforward contains only the most recent 6
6 months of COAs. As a result, it does not correct addresses for older COA orders. In
7 addition, the most frequently used FASTforward method (as described in Appendix I)
8 does not provide the mailer (the presort bureau's customer) information on new
9 addresses for the pieces that are updated. This primary FASTforward method will
10 update the destination address on the mail piece, thereby avoiding forwarding during
11 the initial 6 months after a move. When the COA record is removed from the
12 FASTforward files after 6 months, the mailer has no record of the COA and the risk of
13 delivery to the old address resumes.

14 Given the inherent technological complexity of MLOCRs, coupled with the
15 harsh environment in which they operate, lifting an accurate image off of live mail
16 drastically reduces the match rate, when compared to computerized list correction
17 processes. In addition, mail pieces on which the MLOCR cannot read the name and
18 address, or which are rejected by the MLOCR, or which are sorted with a non-delivery
19 point barcode (e.g., 5-digit barcode), do not receive the benefit of FASTforward. The
20 current average match rate of FASTforward is 1.13 percent, somewhat lower than the
21 average 4.27 percent achieved in NCOA.⁸ Another important limitation of FASTforward

⁷ Docket No. MC95-1, USPS-LR-MCR-76, Section 4.2.

⁸ FastForward match rate from National Customer Service Center records. NCOA match rate from USPS-RT-18B.

1 is that it can only be used to update addresses associated with COA orders if the
2 address contains the exact name(s) and/or family name associated with the COA.
3 Nicknames or first initials will often prevent an update.

4 If used once every 6 months, as specified in the Move Update requirements,
5 NCOA does not eliminate every possible mail forwarding. This is because the Postal
6 Service processes approximately 100,000 new change of address orders (COAs) daily,
7 with the data being updated weekly. If an address list is being processed via NCOA
8 every six months, there will still be a lot of mail forwarded. More frequent use of NCOA,
9 which is not imposed by the Move Update requirements, would increase the
10 effectiveness of NCOA. Again, as for FASTforward, the inherent technical limitations of
11 computer programs to accurately separate and match the components of the names
12 and addresses cause some potential moves to be missed. NCOA is also limited in the
13 same way as FASTforward, in that it requires name matches between the mail piece
14 address and COA order with exacting specifications, before an address update is
15 provided. NCOA does provide the optional service, which is not necessary to meet the
16 Move Update requirement, of receiving information on near matches (the NCOA Nixie
17 Service), which the mailer can then investigate to determine if there has been a move.

18 Despite the limitations of FASTforward, I am somewhat discouraged by the fact
19 that a significant number of the MLOCRs of presort bureaus and other commercial
20 mailers are not using nor intend to use the FASTforward technology as the method of

1 compliance.⁹ Apparently, much of the planned or actual compliance of presort bureau
2 mail is via NCOA, ACS, and ACR. I fear that, in some cases, there may be no
3 compliance at all.¹⁰ We are preparing to implement a compliance review process
4 across the mailing industry to determine how and what mailers are doing in this area.

5 Clearly, the use of Move Update tools has increased since FY96. Unfortunately
6 there is no evidence of a reduction in the UAA volumes. The primary example of the
7 increase use of Move Update tools is shown in USPS-RT-18B, *NCOA Statistics*. In
8 FY97, the NCOA licensees processed over 80 billion addresses and found over 3
9 billion customer moves, which represents a 4.18 percent match rate. On the surface,
10 one might expect those kinds of numbers to have resulted in a decrease in mail volume
11 in the Computerized Forwarding System (CFS) sites. However, Exhibit USPS-RT-18C,
12 *First Class Mail Comparisons*, shows that CFS First-Class Mail volume for FY 97 went
13 up four percent from FY96. The year-to-date FY98 CFS volumes by AP for First-Class
14 Mail are at the same levels as for FY97, as shown in Exhibit USPS-RT-18D.
15 Unfortunately, we are not yet seeing declining UAA volumes, and certainly not the 25
16 percent decline estimated by Mr. MacHarg.

⁹ Out of 1094 MLOCRs used by presort bureaus and commercial mailers which are currently MASS certified (and 71 MLOCRs for which MASS certification applications have been made, but are not yet approved), there are 259 MLOCRs currently certified and licensed for FASTforward, with 87 applications pending. Less than one-third of the mailers' MLOCRs will be certified and licensed for FASTforward.

¹⁰Presort bureaus insisted that they would not use NCOA, ACS and ACR (See PRC Op. MC95-1, page VI-10), which is why the FASTforward system was developed.

VI. CONCLUSION

In my opinion, it is premature to draw conclusions related to the operational and cost impact of the FASTforward Move Update requirement. There currently is insufficient utilization of FASTforward by the commercial presort industry over an adequate time frame on which to base any reasonably accurate assessment of its correct utilization, overall compliance and operational impacts.

The ultimate impact of the Move Update requirement on Postal Service operations and costs will depend on which alternatives and options are used by mailers, how well they employ these tools, and how effectively they integrate the correct address information into their business and mailing systems.

The Postal Service plans to aggressively review industry compliance, collect data and monitor the integration of Move Update tools into business processes. This will enable us to accurately quantify the impact of NCOA, ACS, FASTforward, ACR and the 1% Move Accuracy options on postal operations, CFS mail volumes and UAA mail. Once address quality programs and Move Update processing tools are fully integrated into the business processes of bulk First-Class mailers, I am confident that there will be consistent and measurable reductions in all types of UAA mail. We trust that Mr. MacHarg and his peers will continue to work closely with us and continue to make valuable contributions to these efforts.

APPENDIX I

Description of The Methods for Meeting Move Update Requirements and Other Services of the National Customer Support Center

The National Customer Support Center (NCSC), offers the following methods or options for meeting Move Update requirements.

A. Address Correction Service

Currently, Address Correction Service offers two mailer endorsements options for First-Class Mail:

1. Return Service Requested (RSR--formerly Address Correction Requested)

under which the Postal Service does not forward a UAA mail piece. Instead, during Months 1 to 18 relative to the effective date of a Change of Address order, the mail piece is returned to the sender, along with new address information. Alternatively, if it is undeliverable for reasons other than a move, the reason for non-delivery is noted. This returned mail containing the address information can then be used by mailers to update their address database. There is no address correction fee charged for this service. The mailer then has the choice of re-mailing the piece to the corrected address to affect delivery to the intended recipient.

2. Address Service Requested (ASR--formerly Forwarding and Address

Correction Requested) under which the Postal Service forwards the mail piece during months 1-12 relative to a Change of Address effective date, and sends a separate address correction notice to the mailer. The mailer is charged \$0.50 for the address

1 correction notification.¹ If the mail piece is undeliverable for reasons other than a
2 move, the piece is returned to the sender with the reason for nondelivery noted on the
3 piece. There is no charge if the mail piece is returned. During months 13-18 relative to
4 the effective date of a Change of Address order, the mail piece is returned to the
5 sender along with new address information or, if undeliverable for reasons other than a
6 move, a notation specifying the reason for non-delivery. There is no ASR fee in this
7 case.

8

9 **B. Address Change Service (ACS)**

10 **Address Change Service**, which is an electronic enhancement to the traditional
11 manual address correction process, currently has 3,072 active participants (FY97).
12 These participating companies have been provided over 654 million electronic change
13 of address notifications since inception in 1985. The ACS process was developed in
14 cooperation with mailers who saw value to the expeditious updating of customer
15 mailing addresses electronically. It greatly reduces the time and money required for
16 labor-intensive operations associated with this activity, such as manual
17 sorting/handling and data entry, for both the mailer and the Postal Service. Since
18 mailers' addresses are updated expeditiously, fewer undeliverable-as addressed mail
19 pieces enter the mailstream, providing service improvement and cost savings to the
20 Postal Service and the mailing community.

21 ACS notifications are less expensive for the Postal Service to provide
22 and therefore the cost to the mailer is less. The current (and proposed) fee

¹This is both the current and proposed fee, see witness Needham, USPS-T- 39, p. 8.

for ACS notifications is 20 cents each, compared to 50 cents each for manual notifications.²

C. National Change Of Address (NCOA)

Created in 1986, the **National Change of Address** service electronically reflects move activity on a mailing list before a mail piece is created. This is accomplished by a computer based matching process that identifies, (via strict Postal Service defined and approved name and address matching logic), individuals, families and business who have moved and filed a permanent change of address order (COA) with the Postal Service. The NCOA file that is matched against a mailer's name and address list contains approximately 115 million change of address orders that reflect a running three-year period, relative to the effective date of a COA order. The NCOA file is updated to reflect move activity weekly. The NCOA service is provided to the mailing industry via 23 commercial companies licensed by the Postal Service.³ When a mailer submits its file to a licensee for processing, the list is ZIP+4 and delivery point coded (DPC). The list also is standardized using CASS certified software. Then, it is processed against the NCOA file. If a match is made to the NCOA file, then the new address information is provided to the mailer for the purpose of updating its mailing list. Additionally, every list processed is returned with a National Delivery

² See witness Needham, USPS-T- 39, p. 8.

³ Additionally, there is an NCOA license approved for the U.S. House of Representatives for usage by the House and Senate and other federal agencies.

1 Index (NDI) evaluation attached, thereby providing the list owner with
2 additional quality assessment data (information on how good the list is and
3 where is it deficient).

4 To safeguard against false move updates, NCOA only provides a
5 move update if the name matches between the mail piece address and COA
6 order with exacting specifications. . As a result, some addresses, for which
7 there is a COA order, will not be updated by the NCOA process, because
8 the NCOA process obtained only a near match.⁴ NCOA does provide the
9 optional service, which is not necessary to meet the Move Update
10 requirement, of receiving information on near matches (the NCOA Nixie
11 Service), which the mailer can then investigate to determine if there has
12 been a move.

13 An NCOA licensee is required to process and return the mailer's file
14 within seven working days unless the mailer grants a written wavier. These
15 licensees also provide a broad range of mailing related services to the
16 mailing industry. They have the knowledge and technology to support any
17 mailer, small or large. One licensee is specifically designated by the Postal
18 Service to provide low-cost diskette processing to personal computer users.
19 As an indication of just how accessible and accepted this service is, during
20 FY 1997, over 100,000 customer lists were processed by the licensees. In

⁴ An example of a near match is if an addressee in a mailer's list is M. Murphy, and there is a COA for a Michael Murphy. This near match is not used to directly update an address, in order to avoid erroneous updates.

FY 1997, NCOA processed more than 80 billion addresses in the commercial market place, with a match rate of 4.2%.

To meet the Move Update requirement, mailers must check their addresses with the NCOA service in the six months prior to mailing. More frequent use, however, will further enhance the mailing list.

D. FASTforward_{SM}

The FASTforward system is available in two distinct versions.

1. FASTforward for Multiline Optical Character Reader (MLOCR) and Remote Video Encoding (RVE) interfaces with commercial mail-processing equipment.
2. FASTforward for Mailing List Correction (MLC) provides licensees the ability to update computer-based name and address mailing lists electronically prior to creation of the mail piece.

The presort industry utilizes FASTforward for the mailings which they prepare with MLOCRs. The system consists of a licensed computer system containing very rigid name and address matching software and the COA database. The database reflects COA data for the previous six months. The Postal Service is the sole owner and distributor of the FASTforward hardware and software components that comprise the FASTforward system. Licensed systems are also required to have a FASTforward interface, provided by certified vendors, that meets USPS specifications. Using FASTforward for MLOCR, mailpieces can be processed in one of three different modes:

1 1. Re-address the matched mail pieces and submit directly to the USPS.

2 Eighty-seven percent (87%) of all mail processed via FASTforward for
3 MLOCR is processed using this mode.

4 2. Re-address the matched mail pieces and return to the mailer. This
5 represents 13 percent of all mail processed via FASTforward for MLOCR.

6 3. Re-address the matched mail piece facsimiles and return to the mailer.

7 Less than 1 percent of mail processed using FASTforward for MLOCR is
8 processed in this mode.

9 The latter two modes have the added benefit of providing the new address information
10 to the mailer.

11 12 **E. Mailers Whose List Update Process Is 99% Accurate**

13 Move Update alternate processing provides yet another method for those
14 mailers who, because of their own address list updating process, state that their
15 addresses are up-to-date and at least as accurate as the Postal Service's addresses.
16 Mailers must apply for and be approved for this processing service. The submitted list
17 will be processed (matched) against the most recent NCOA information to identify move
18 activity that has not been incorporated into the mailer's list. Addresses that are
19 identified as being in need of updating will be flagged on the mailer's list, but the new
20 address information will not be provided. Processing of the mailer's list will generate a
21 summary that will determine the percentage move rate within the mailer's list.

22 If the move rate is determined to be one percent or less, the mailer must
23 resubmit the mailing list for a second evaluation in 90 days. The list must reflect all

activity that occurred during this interim period. If the determined move rate is still one percent or less, the mailer will receive documentation indicating that mailings generated from the tested list will meet the Move Update requirement for a period of 1 year from the date of the second evaluation. The mailer must then re-test the following year using the same two-step process to extend the Move Update qualification.

National Customer Support Center

The National Customer Support Center, previously named the National Address Information Center, has developed and provides the following services : Coding Accuracy Support System (CASS), Multiline Accuracy Support System (MASS), Delivery Sequence File (DSF), Address Element Correction (AEC), National Change of Address (NCOA), Address Change Service (ACS), FASTforward_{SM}, Correct Address Notification (CAN), Move Validation Letters (MVL), and Customer Notification Letter (CNL). For more information, see The Official Guide to Postal Products, Services, and Publications, USPS-LR-MCR-120, Exhibit A. in Docket No. MC95-1.