

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON DC 20268-0001**

**Classification and Price Adjustments  
for First-Class Mail and Standard Mail  
Initiatives**

**Docket No. R2011-1**

**COMMENTS OF THE ASSOCIATION FOR POSTAL COMMERCE**

Pursuant to Order No. 577 of the Postal Regulatory Commission (“Commission”), the Association for Postal Commerce (“PostCom”) submits these comments in response to the United States Postal Service’s (“Postal Service) Notice of Classification and Price Adjustments For First-Class Mail and Standard Mail Initiatives. PostCom on October 21, 2010, submitted to the Postal Service its comments on the USPS proposed rules concerning changes to Move Update Standards (Proposed Rule, Address Correction Notices for Letters and Flats Qualifying for Full-Service Intelligent Mail and Changes to Move Update Standards, CFR Vol 75 No. 182, 57410-57412).

PostCom, at this time, submits comments pertaining to increases in Move Update assessment charge threshold.

**MOVE UPDATE ERROR THRESHOLD**

The Postal Service has stated publicly (at MTAC meetings) that there are few mailings where Performance Based Verification (PBV) move update scores are close to the 30% threshold, and that mailings routinely score much higher or significantly lower than the 70% accuracy threshold. In the absence of a demonstrable need, it would seem that the current 30% error threshold is sufficient for separating the postal wheat from the chaff. It is unclear why the

USPS needs to change the move update error threshold at this time.

## **ADDITIONAL ISSUES**

The USPS has proposed that its online publication, *Guide to Move Update*, become the appropriate source for additional information about policies and procedures for meeting the Move Update requirements. This could make it difficult for customers to know what changes are being made by the USPS and may provide limited notification to the mailing industry. The USPS needs to develop other more appropriate and inclusive means for communicating changes in policies and procedures pertaining to Move Update.

Also, many PostCom members report that audits and investigations being performed by the U.S. Postal Inspection Service (USPIS) are utilizing different Move Update policies than the USPS has outlined in its proposed rule or existing standards.

Mailers have no way to comply with policies that differ from those published by the USPS. The standards and processes the Inspection Service uses regarding regulatory compliance should be consistent with those published by the USPS (including Performance-Based Verification mailing results).

The USPS needs to better educate the Inspection Service on official Move Update processes, standards, and compliance so that its audits/investigations are based on officially documented, publicly available standards.

## **CONCLUSION**

In the absence of a demonstrable need, it would seem that the current 30% error threshold is sufficient for separating the postal wheat from the chaff. It is unclear why the USPS needs to

change the move update error threshold at this time. PostCom strongly suggests that the Commission reject the Postal Service's request to change the Move Update threshold at this time.

Respectfully submitted,

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