



7/20/2012

Pony Mailbox & Business Center
242 West Main St.
Hendersonville, TN. 37075

Re: Complaint Regarding Postal Service Offering DOCKET # MC2012-26 ENHANCED SERVICES
PRODUCT FOR COMPETITIVE PO BOXES

I am the owner of Pony Mailbox & Business center, established over 22 years ago, and a small business that is a Certified Mail Receiving Agency (CMRA) and have some comments about the United States Postal Service venturing into additional services for their PO Boxes. While it has been determined that those boxes are competitive with our Private Mail Boxes (PMB)'s, there are still distinct differences that set them apart from our Private Mail Boxes (PMB).

The new service of email notification, being offered by the USPS, is a new service. The USPS has not been NOTIFYING their PO Box customers in the past. The service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicted the statements made by the USPS that they are already providing these services and that they are bundled into the PO Box rental fee. If the services were available in the past this maybe true but as new services there is a clear difference between the past and the present.

The second new service that is now available is street addressing for private carrier delivery to the PO Box. I have a few objections to this.

1: The USPS claims that some companies will not deliver their products to a PO Box due to fraud. By masking the actual PO Box with a street address USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. USPS is going to cause my business harm in the same manner that they are deceiving the merchant. Once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes, CMRA addressing will be swept up with that same brush and we will end up losing customers because of the required addressing standards that the USPS has imposed on CMRA's.

2: The acceptance of the packages at the street address causes a conflict with the USPS policy and procedures of getting a signature for accountable, insurable and registered mail products. The expectation and legal right of the mailer is being misused and deceived by the blanket acceptance form the USPS will require for the acceptance of mail at the street address. Is the acceptance of a package at the street address using the release sufficient to maintain the high standards of the registered mail piece, or the court recognized certified mail piece or even the USPS own standards for the insured mail piece?

3: Street addressing costs and logistics involved do not justify a no charge bundling of this service. By the USPS's own admission there is a cost involved in moving those packages from a receiving area to the delivery area. If there is cost then there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs



some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase.

4: The USPS has not shown the detailed costs involved in providing the form completion, at the retail counter, the database support or the costs involved in physically storing these street address packages for pickup at the retail counter. Additionally the time spent, at the retail counter, retrieving and handing said packages over to the mailbox holder have not been detailed.

It really seems very evident that the USPS has not thought their plans through very well. Take for example:

1. How much Express Mail Revenue will be lost because customers can now send to PO Box Customers through UPS and Federal Express overnight services?
2. Storing incoming parcels from commercial carriers will take up valuable space.
3. Will the Postal Service be responsible for parcels that are mishandled at the Post Office?
4. When a P O Box customer never picks up a parcel delivered by a commercial carrier, how will it be handled?
5. How will postal workers be able to sort through incoming commercial parcels and reject those that should not be received?
6. What is the cost of handling these commercial parcels? Each one will have to be received, identified and notices placed in the customer's P O Box, then signed for when retrieved. This creates additional documents that must be stored.
7. The enhanced services will increase the wait time in line for all USPS customers.
8. How much will it cost to maintain an accountability system for the distribution of these commercial parcels?
9. The Postal Service keeps no photos of their P O Box customers. That will make tracking down people who commit criminal acts much more difficult for law enforcement.
10. What problems will occur with P O Box customers who have a large staff that will also start receiving commercial parcels using the street address?
11. As more and more Mail and Parcel centers are forced out of business, The Postal Service will lose the revenue these stores generate selling postal products at no cost to the Postal Service. Each Mail and Parcel center sells on average at least \$100,000 per year in Postal Products including Stamps, Express Mail, Priority Mail and Parcel Post.

Now consider additional consequences these new services will inflict on the local communities.

1. Lost Sales tax in states that charge sales tax on Private Mail Box Fees.
 2. If Private Mail Box stores are forced to close and layoff employees. What will the costs of unemployment be?
 3. The number of empty storefronts will only increase, hurting the property owners.
- Every CMRA saves the Postal Service considerable revenue; The postal service can deliver mail to one delivery point and reach 100s of postal patrons who receive their mail there. In many cases the CMRA sends personnel to the Post Office to pickup the mail. The CMRA even supplies at no cost to the postal service the personnel who place the mail in the stores private mailboxes. The Postal Service has no cost for the building and commercial space that houses the CMRA mailboxes. Should the new enhancements succeed in closing many of the independent Mail and Parcels centers, what will be the true cost to deliver the mail to those customers who now get their mail at 1000s of different locations.



PONY
MAILBOX &
BUSINESS
C E N T E R

It is unreasonable to ask small family businesses like ours to compete with the Post Office. Make the USPS play by the same rules we have to play by. Pay taxes, pay insurance/licenses, etc., on vehicles, live within a budget, just to name a few.

Thank you for your consideration on this matter.

Sincerely,

Patrick McCorkle, Owner
Pony Mailbox & Business Center
242 West Main St.
Hendersonville, TN. 37075
Ph. 615.822.4700
Fax. 615.822.4777
Shippony@comcast.net