



Before the POSTAL REGULATORY COMMISSION WASHINGTON DC 20268-0001
Complaint Regarding Postal Service Offering DOCKET # MC2012-26 ENHANCED
SERVICES PRODUCT FOR COMPETITIVE PO BOXES

COMMENTS OF JAMES EDWARD BOWE, 20 JULY 2012

I am the owner of a small business which is a Commercial Mail Receiving Agency (CMRA) and want to provide comments regarding the United States Postal Service venturing into additional services combined with Post Office (PO) Box rental. Although it has been previously determined that PO boxes are competitive with my industry's Private Mail Boxes (PMB)'s, several distinct differences set them apart from our Private Mail Boxes (PMB).

The service of email notification, being offered by the USPS, is a new service. The USPS has not previously been NOTIFYING PO Box customers of mail or parcel delivery. The new service requires labor and the implementation of new technology, each of which has a cost. Contrary to the USPS position that these costs are included in the base cost of a PO Box rental, because the notification service is new it actually contradicts the statements made by the USPS that they are already provided services and bundled into the basic PO Box rental fee.

The second new service now available is street addressing for private carrier delivery to PO Boxes by non-USPS carriers. My objections to this are as follows:

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 the USPS would actually be assisting in deceiving the merchants that they are not shipping goods to a PO Box.
2. The USPS will, in turn, damage my business reputation once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes. CMRA addressing will be lumped together with the perception that it is actually a PO Box and customers will be lost as a result of mandatory addressing standards imposed upon CMRAs by the USPS.
3. The acceptance of the packages at the street address is a conflict the USPS policy and procedures requiring a signature for accountable, insurable and registered mail products. The expectation and legal right of the sender is being misused and deceived by the blanket acceptance form the USPS will require for the acceptance of mail senders at the PO Box "street address." The acceptance of a package at the street address using the release does not sufficiently 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.
4. The additional cost and logistics of street addressing costs do not justify a no charge bundling of this service by the USPS. By the USPS's own estimates, there is a cost involved in moving those additional packages from a receiving area to the delivery area. If there is cost then there needs to be postage or rental fees to cover those costs. It is well known that an individual cannot hand mail to my letter carrier for even



internal delivery to a postmaster without affixing the necessary postage. Therefore it is obvious that every item handled and delivered by USPS personnel needs some sort of postage. Acceptance of non-USPS articles (i.e. UPS, FedEx, DHL) creates a non-revenue generating delivery – no revenue from postage or rental fees. The USPS filing does not provide a breakdown of costs demonstrating that the cost of implementing these specific new additional services is covered by the PO Box rental rates.

5. The USPS has not shown the detailed costs involved rental form completion at the retail counter, the database management and support, or the costs involved in physically storing these street address packages for pickup at the retail counter. Additional time spent at the retail counter, retrieving and handing these additional non-mail packages over to the mailbox renter have not been detailed.

It is my opinion, and the results seem to support, that email notification and street addressing is a premium service not expected with a USPS PO Box. PO Box customers seek an inexpensive alternative to receiving mail at their residential or business location, not premium services. 66,000 mailbox customers canceled or did not renew their boxes in the first 6 months of the program – something that should clearly demonstrate to the USPS (and PRC) that these additional services are not what a PO Box customer really wants. These additional USPS PO Box services are adding additional costs to people and businesses who are seeking savings, and not premium convenience and service customers.

I feel that these services will benefit the USPS and may in actually tarnish the image and reputation of the high standards the USPS strives to operate under. Implementing services such as this that do not improve USPS profitability and that will damage private CMRAs, such as my own, will eventually weaken the entire U.S. Postal system. Of course I have an interest in protecting my own business, but it is important to understand that a large portion of my business is based upon the success of the U.S. Postal Service delivery system – something which will not be attempting to add services better provided by independent partners as myself.

Thank you for considering my concerns.

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James E. Bowe
Owner