

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

COMPLAINT REGARDING POSTAL SERVICE
OFFERING ENHANCED SERVICES PRODUCT
FOR COMPETITIVE PO BOXES

DOCKET # MC2012-26

COMMENTS OF GKP Enterprises, LLC DBA The UPS Store #211
July 25, 2012

I am the owner of a small business that is a Commercial 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 Box (PMB) service, there are still distinct differences that set them apart.

The new service of email or text notification of mail receipt being offered by the USPS is a service that requires labor and technology to implement and maintain. This service does not appear to have been included in the base cost of a PO Box, and contradicts the statements made by the USPS that they are already providing these services, bundled into the PO Box rental fee.

Another 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, the USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. The USPS is going to cause my business harm in the same manner. 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 could 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 standards for the insured mail piece?
3. Street addressing costs and the 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 fees to cover those costs. While there has been an 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. Failure to price the product properly could add to the USPS's already significant deficit.

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 handling said packages over to the mailbox holder have not been detailed. There will be longer lines at post office windows for all customers as clerks leave their posts to retrieve packages for these customers, negatively impacting all postal customers. I know. I have been there, and watched it happen.

Additionally, there are significant unfair regulatory advantages with the inability of PMB customers at a CMRA location to file a change of address form once their contract has ended, providing them with the 12-month free forwarding service offered to PO Box customers. Currently, I am required to handle mail for 6 months for all departed or cancelled customers. And as a store owner, I have to apply new postage to any item that is forwarded during this term.

As you know, the USPS has publicly expressed their desire to move away from 6-day to 5-day delivery services. As their proposed plan stands today, their PO Box customers would continue to receive 6-day delivery of their mail, while the PMB customers at my CMRA would not. This would be yet another significant unfair advantage, regulated by the USPS as they compete with me.

In conclusion, email notification and street addressing as a premium service doesn't seem to be what the public wants. They have spoken loudly, already 66,000 mailbox customers have cancelled or not renewed in the first 6 months of the program. In my experience, the PO Box customer wants an inexpensive place to receive their mail and generally know when their mail is placed in the PO Box. These enhanced services are adding costs to people and businesses who are "value purchasers" rather than "convenience and service customers". For all the reasons I have outlined I feel that these services are not benefiting the USPS and, in fact, have the chance of further damaging both the USPS and the local businesses forced to compete with them while they use their \$100,000,000 annual advertising budget and already generous tax advantages to boost their monopoly.

I respectfully ask that these PO Box enhancements cease to operate as soon as possible. Thank you for your consideration on this matter.

GKP Enterprises, LLC DBA The UPS Store #211
Geraldyn Pettit
Member
145 S. Livernois Rd.
Rochester Hills, MI 48307