

July 25, 2012

DOWNTOWN MAIL AND SHIPPING
COMMENT TO RESPONSE OF THE UNITED STATES
POSTAL SERVICE TO ORDER NO. 1366

Docket No. MC2012-26

Downtown Mail and Shipping, a CMRA, has been a private mailbox service for over 30 years. We feel the USPS, with its new mailbox enhancements, is targeting the mailbox customer base of the CMRAs it regulates. This customer base is vital to our businesses.

The current CMRA regulations coupled with the new enhancements would be grossly unfair and have an untold negative effect on our income.

The enhanced PO Box services currently being offered that we oppose include:

- Offering Post Office Box renters the use of the Post Office street address for Post Office Box addressing.
- Removing the PO Box designation when using a street address.
- Offering Post Office Box renters email notification of mail delivery.
- Offering Post Office Box renters the ability to receive packages from private carriers.

In reality, these enhancements allow the USPS to offer an identical service to Private Mail Box (PMB) Service. The CMRA regulations established by the USPS create an unfair advantage for the USPS in offering those services. Those unfair regulatory advantages include, but are not limited to:

- The requirement to handle mail for 6 months for departed or cancelled customers. As a store owner, I have to apply new postage to any item that is forwarded during this term.
- The inability for PMB customers to file a change of address form once their contract has ended with the CMRA.
- The inability for PMB customers to get the same free forwarding service offered to PO Box customers.

Additionally, the USPS has publicly expressed their desire to move from 6-day to 5-day delivery. The USPS has repeatedly stated that as their plan stands today, PO Box customers would continue to receive 6-day delivery while PMB customers would not. Should the Post Office obtain approval of their desired 5-day delivery plan, they would gain yet another unfair advantage over PMB service.

It is unreasonable to ask small businesses to compete with the Post Office when that entity gives itself regulatory advantages on like services and products. When the Post Office first sought to move the PO Box service from the Market Dominant to Competitive category, no mention was made of adding any enhancements. These enhancements change the basic product, and when combined with the CMRA regulations, create a distinct and unfair competitive advantage for the USPS.

We respectfully request that the Commission advise the Post Office to cease offering these PO Box enhancements as soon as possible. We encourage the USPS to appreciate our contribution to their business and work with, not against us.

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