

POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

COMPLAINT REGARDING POSTAL SERVICE OFFERING
ENHANCED SERVICES PRODUCT FOR COMPETITIVE
MAILBOXES AND COMMENT TO THE RESPONSE OF THE
UNITED STATES POSTAL SERVICE TO ORDER NO. 1366

DOCKET# MC2012-26

I want to thank the PRC for the opportunity to comment on the Postal Service's proposed enhancements to their mailbox product.

I am a small business owner who owns a Pak Mail Centers of America, Inc., packing and shipping franchise. Our system operates over 255 store locations around the US that offer and support shipping solutions provided by the United States Postal Service. We operate a small business that has 2 part time employees in addition to myself and my wife. Our business is classified by the United States Postal Service (USPS), as a Commercial Mail Receiving Agency (CMRA) and a USPS Approved Shipper. I am writing the Postal Regulatory Commission to object to the enhancements currently being offered by the Postal Service surrounding the PO Box services. These enhancements create an unfair competitive advantage for the USPS and they will have a negative impact on our revenue should the PO Box enhancements become fully implemented.

Several enhanced PO Box services that are currently being offered are:

- Use of a Post Office street address by Post Office Box renters.
- No requirement of a PO Box designation when using a Post Office Street address.
- Email notification of mail delivery.
- Private carrier parcel receiving.

These identical services to our Private Mailbox service (PMB) create an unfair advantage for the USPS from both a cost and service perspective. These advantages include but are not limited to:

- We are required to receive and hold mail for 6 months after a PMB is closed or cancelled by the renter.
- The renter of a PMB is not allowed to file a change of address form.
- The renter of a PMB does not have the benefit of free mail forwarding.

Furthermore, the USPS desire to reduce mail delivery to 5 days per week while still providing delivery service to PO Box customers and not allowing the same delivery to PMB customers will again create a significant disadvantage to my business. My business will be seriously impacted should this proposal be approved. It is unreasonable to expect a small business like myself to compete with an organization that gives itself regulatory advantages on competing products and services. Allowing Post Office box renters to use the Post Office street address will create an erroneous perception to merchants. USPS claims fraud is the reason some companies will not ship to a PO Box. Allowing use of the Post Office street address misleads merchants as to where they are shipping. The number sign (#) will become a well-known identifier of PO Boxes, but also label CMRA's as a PO Box since there will be no distinction between the two. This will seriously cause my business to decline due to the unfair competitive changes allowed by the USPS.

Receiving packages at the street address conflicts with USPS policy and procedure regarding obtaining a signature on accountable, insurable, and registered mail products. All of these changes do not justify a no-charge bundling of services. Any letter or parcel handled by USPS personnel needs to have a stamp

on it and the extra handling of private carrier packages will have associated labor costs with no extra charge to Post Office box renters.

I am requesting that the enhanced PO Box services currently being offered and proposed by the Post Office cease by order of the commission.

Pak Mail US 102

Charles Argus

Owner

4719 Quail Lakes Dr Ste G

Stockton CA 95207