

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Notice of Market-Dominant
Price Adjustment

| Docket No. R2015-4

COMMENTS OF CERTIFIED-MAIL-LABELS.COM

February 4, 2015

Pursuant to Commission Order No. 2327 (Jan. 20, 2015), Certified-Mail-Labels.com submits these comments. Certified-Mail-Labels.com is a leading online provider of USPS Certified Mail data processing using PC Postage. USPS Certified Mail has been *exclusively* trusted to deliver sensitive health care records, personal identity records, financial, credit cards and other important compliance documents.

We appreciate this opportunity to address the Postal Service's Notice as part of an omnibus adjustment.

Regarding proposed changes to Certified Mail; Page 33

"Certified Mail prices are increasing by 4.8 percent, reflecting the value the service provides (Factor 1). Additionally, new options (Certified Mail Restricted Delivery, Certified Mail Adult Signature Required, and Certified Mail Adult Signature Restricted Delivery) are being offered under Certified Mail"

Regarding proposed changes to Return Receipt; Page 35

“The Postal Service is eliminating the option for mailers to purchase a Return Receipt after Mailing, as usage is very low. Mailers wanting a return receipt will need to use either electronic or hardcopy Return Receipt at the time of mailing”.

It appears that the United States Postal Service is proposing to cut services associated with Certified Mail. The Certified Mail service has been exclusively trusted to USPS for mailings containing sensitive health care records, personal identity records, financial, credit card and other compliance documents.

Questions related to this proposed change of service:

1. Under the current DMM definition of service of Certified Mail a Signature is collected (and archived for two years) by USPS for each Certified Mail delivery regardless of the customer purchasing the Return Receipt service or not.
Will that aspect of the Certified Mail service change?
If so, where are the proposed changes to the “Certified Mail” service published?
How is the 4.8% increase justified if the delivery standards are dramatically lowered?
2. If a signature is no longer obtained/archived by USPS, what evidence will a customer or enforcement official have should they need to audit USPS Certified Mail delivery for accuracy?
3. Has USPS Certified Mail ever been improperly administered? (Scanned or delivered)
4. According to USPS records, what percentage of Certified Mail is improperly administered?

Not providing the option for Return Receipt Signature After Mailing could impact more than 300+ million Certified Mail letters mailed annually. This omission of service will

force customers that use Certified Mail to purchase one of the Return Receipt Signature options at the time of mailing as this would now become the only way for a USPS customer to prove that USPS properly administered their Certified Mail service. This single decision **would increase compliance costs by more than 43%**.

Our company has completed more than 10 million USPS Certified Mail transactions. We have first-hand knowledge of the many letter carrier errors and technical tracking omissions that occur nationwide.

In summary, **we strongly oppose** the Postal Rate Commission's decision to discontinue the Return Receipt After Mailing service. The proposed 2015 Certified Mail rates will increase **4.8%** provided that **the same level of service is made available to consumers**. By removing the Return Receipt after Mailing option, you are forcing customers to purchase each Return Receipt Signature at the time of mailing. This can increase compliance costs by more than 43%.

Respectfully submitted,

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