

NCOA^{Link}[®]
PROCESSING
ACKNOWLEDGEMENT FORM
(PAF) GUIDE

United States Postal Service[®]
National Customer Support Center (NCSC)
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Table of Contents

DEFINITIONS.....	1
• Licensee	1
• List Owner	1
• Broker/Agent	1
• List Administrator	1
• List Custodian.....	2
• List Broker	2
• PAF ID	2
• Broker or List Administrator ID.....	2
• Cooperative Database.....	2
• Combined PAF (Limited Usage only)	3
• Mail Processing Agent.....	3
• USPS Mailer ID.....	3
GENERAL GUIDELINES	4
QUESTIONS & ANSWERS	5
Multiple Customer Lists	8
Scenario 1.....	8
Scenario 2.....	8
Multiple Licensees	8
Scenario 3.....	8
Broker Agent Processing	8
Scenario 4.....	8
List Rentals	9
Scenario 5.....	9
Scenario 6.....	9
Cooperative Databases	9
Scenario 7.....	9
Scenario 8.....	9

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Processing Acknowledgement Form (PAF) Requirements and Clarifications

DEFINITIONS

- **Licensee**
 - Has a signed license agreement with the Postal Service™
 - Receives files from customers for NCOA^{Link®} processing
 - Performs the actual processing of the LIST against the NCOA^{Link} database
 - Responsibilities:
 - Adhering to the License Agreement and Performance Requirements
 - Collecting and maintaining all PAFs
 - Policing the Advertising of all BROKERS and LIST ADMINISTRATORS with which they have a business relationship

- **List Owner**
 - Person/Company for whom processing will be done
 - Usually the owner of the mail created from this list
 - Is the beneficiary of the NCOA^{Link} processing

- **Broker/Agent**
 - Acts as a 'middle-man' between the List Owner (customer) and Licensee
 - Is a 'reseller' for the Licensees service
 - Must not retain the file from the List Owner for more than 45 days
 - May receive updated addresses from the Licensee for the purposes of delivering the same to the List Owner, but is never the final repository for the data

- **List Administrator**
 - Houses, maintains, updates and 'baby-sits' the list for the List Owner
 - Has a contract to provide the above services to the List Owner (customer)

- **List Custodian**
 - Any responsible party/officer in a company (List Owner) who is responsible for an address list within that company

- **List Broker**
 - A third responsible party company whose business is to compile and sell lists of addresses and names.
 - List Rental scenarios have further explanations of when List Brokers should be signing a PAF.

- **PAF ID**
 - A four-part 18 byte list/company identification scheme:
 - Bytes 1-4 are the PLATFORM ID of the Licensee assigned by the USPS
 - Bytes 5-10 are the NAICS code for the List Owner
 - Bytes 11-12 are the approximate frequency of processing on an annual basis (usually 01-52 or 99)
 - Bytes 13-18 are the UNIQUE ID to that list assigned by the Licensee

- **Broker or List Administrator ID**
 - A three-part 16 byte company identification scheme:
 - Bytes 1-4 are the PLATFORM ID of the Licensee assigned by the USPS
 - Bytes 5-10 are the NAICS code for the Broker or List Administrator
 - Bytes 11-16 are the UNIQUE ID to that company assigned by the Licensee

- **Cooperative Database**
 - A cooperative database is a repository for the “house” files of many companies, which holds information on customers and their transactions. These databases are usually maintained (hosted) and managed by data services companies. Many companies will contribute information to a database in return for aggregate information on the customers other companies have provided. Such databases are often used for promotional mailings. (Adapted from Wikipedia - http://en.wikipedia.org/wiki/Cooperative_database)
 - A cooperative database requires more than one data owner and the data in cooperative databases is not wholly owned by the company hosting the information, a PAF must be on file for each cooperative database participant in the cooperative database.

- PAF preparation for cooperative databases,
 - The hosting company must appear as the List Administrator.
 - Each participant must complete a PAF once annually.
 - If the hosting company is also a participant, then they do not have to complete the List Administrator section for themselves.
 - At NO time can the cooperative database be processed under a single PAF as an internal file, even when the host company is a participant in the cooperative database.
 - This applies to databases for which the NCOA^{Link} licensee is the data host and for databases for which the host is a third party.
 - Since the cooperative database is owned by many participants and is used for accessing new clients, New Mover selections from a cooperative database processed against NCOA^{Link} is strictly prohibited. As is the case with other NCOA^{Link} processed lists, the USPS will only allow a New Mover selection for a company that has an on-going client relationship on its own database.
- **Combined PAF (Limited Usage only)**
 - A combined PAF and Required Text Document (RTD) are available for Limited Service Providers who also provide services to Full Service Providers as a 'Broker'.
 - This PAF is designed for customers who process their files primarily through a LSP, who may periodically submit the file to a FSP. It should also be used when the LSP performs ANK^{Link} processing and submits the ANK^{Link} results to the FSP.
- **Mail Processing Agent**
 - A Mail Processing Agent (MPA) is an entity that provides printing and mailing services at multiple retail locations. A Mail Processing Agent receives customer's mails at these locations for mail preparation at centralized print and mail facilities under the same entity. The mail pieces generated from the mailing lists are then presented for depositing into the mail stream for acceptance, handling and distribution by the USPS.
- **USPS Mailer ID**
 - A Unique ID assigned by the USPS for use with the Intelligent Mail[®] Barcode.

GENERAL GUIDELINES

- There can only be one List Administrator per PAF.
- Licensees can Broker to other Licensees (commonly LSP to FSP).
- There can be multiple Brokers for a list and when there are multiple Brokers the following applies:
 - a. All Brokers must sign the PAF.
 - b. The Broker closest to the Licensee in the transaction will sign the original PAF as the Broker.
 - c. Additional Brokering parties will each attach an additional PAF, write in the customers name, fill in the address area with the words "SEE ATTACHED" and complete the bottom section.
 - d. The CUSTOMER does not sign the additional forms.
 - e. The Licensee signs the original PAF and files all copies of the PAF together.
- The PAF must be signed by
 - Always:
 - List Owner
 - Licensee
 - When applicable:
 - Broker(s)
 - List Administrator
- PAFs must be collected to comply with the PRIVACY ACT of 1974.
- There is only one List Owner for a PAF.
- There is only one Licensee for a PAF.
- The List Owner cannot be the Broker for the same list.
- The List Owner cannot be the List Administrator for the same list.
- The Broker cannot be the List Administrator for the same list.
- The List Owner must sign the PAF for all licensees providing processing services.
- Combined PAF
 - All lists from the List Owner must go to the same Full Service Provider listed on the Combined PAF.
 - If the FSP Licensee changes a new PAF is required.
 - This PAF is not to be used with multiple third parties.
 - The list custody is:
List Owner ↔ LSP ↔ FSP
 - The LSP must have a direct relationship with the List Owner.
 - This PAF must be accompanied by the appropriate Combined RTD which explains the services from both types of processing and can only be used with prior approval from the USPS.

- The LSP & FSP are both required to maintain copies of the Combined PAF for 6 years as required in the LPR.
- All other PAF guidelines apply to this PAF.
- The Combined PAF shall be limited for use by United States based companies as List Owners. (No Exceptions)

QUESTIONS & ANSWERS

1. Can a Licensee function as both a Licensee and List Administrator for the same list.
 - a. Yes, in this case, the Licensee will sign both the middle & bottom Sections of the PAF.
2. Can a Licensee be a Broker?
 - a. Yes, Licensees can Broker to other Licensees (commonly – LSP to FSP), but a Licensee cannot Broker a list to themselves.
3. Can there be multiple Brokers?
 - a. Yes, there can be multiple Brokers for one list.
 - b. All Brokers in the chain must sign the PAF.
4. Who should sign the PAF?
 - a. The following people must sign the PAF
 - i. The Custodian of the list as the List Owner
 - ii. The Licensee
 - b. The following people only sign the PAF when applicable:
 - i. All Brokers
 - ii. The List Administrator
5. How is a PAF signed with multiple Brokers/list administrators?
 - a. The initial third party in the chain will sign the original PAF as the Broker.
 - b. Then the next third party will attach a second PAF (or just the bottom third of the page) write in the customer's name and fill in the address area with "SEE ATTACHED" and complete the bottom section. The CUSTOMER does not sign the additional forms.
 - c. Then the final Broker submits all PAFs to the Licensee.
 - d. The Licensee signs the original PAF and files all copies of the PAF together.
6. Does a company have to sign one PAF for each LIST?
 - a. "Yes" – if the LIST CUSTODIAN is not the same.
 - b. "No" – if the LIST CUSTODIAN is the same.
7. Can one PAF stand for all lists within a company?
 - a. Yes, if the LIST CUSTODIAN is the same for all lists.

8. How are multiple list IDs assigned to one PAF?
 - a. By noting the PAF ID on the Front of the PAF as MULTIPLE, then listing the individual PAF IDs on the back of the PAF with the corresponding list name.
9. Can processing be done for a foreign company?
 - a. Yes, with prior approval from the USPS.
10. Why must all Brokers and parties involved in the processing of the list sign as a List Owner, Broker or List Administrator?
 - a. To comply with provisions of the PRIVACY ACT of 1974. Specifically, data within the NCOA^{Link} Database is protected under this law. As custodians of the Data the Postal Service is required to maintain an accurate accounting of all disclosures of this data. So, data for any company/person who is handling a mailing list between the LICENSEE and LIST OWNER must be provided to the USPS to comply with this law. Failure to capture all data can result in the Termination of your license.
11. How do I know if a customer is actually a Broker?
 - a. Ask questions of your customer. It is your responsibility to know all your customers.
12. What will happen if I do not collect the appropriate PAF information?
 - a. Suspension to possible Termination
13. What is a unique list?
 - a. As defined in Section 1 of the license agreement, a list, system, group or other collection of at least 100 unique names and addresses for addressing Deliverables for delivery by the United States Postal Service[®].
 - b. A table within a database
 - c. A list that is maintained separately from all other lists within a company
 - d. A unique list does not mean that a separate ID must be assigned every time a company submits a file. Each List should have a separate ID and should be handled accordingly.
14. Can a BROKER be a LIST ADMINISTRATOR?
 - a. Yes, but not for the same PAF.
15. Can there be multiple LIST OWNERS?
 - a. No, there is only one LIST OWNER
16. Can the List Owner, Broker and/or List Administrator be the same?
 - a. These entities cannot be the same on a PAF.
17. A Customer states that his business is a Sole Proprietorship and his Social Security Number (SSN) is used for the TIN. He does not want to give us this number, what should we do?
 - a. This is the **ONLY** exception to the TIN rule, in this case collect the last 4 digits of his SSN

The Tax Identification Number (TIN) has been removed from the PAF and is no longer required.

18. My customer only wants to sign one PAF for Limited Service and Full Service processing?
 - a. The Combined PAF can be used for this customer only if:
 - i. There are no other third parties (brokers or list administrators) involved.
 - ii. The file will always be submitted to the same FSP listed on the PAF.
 - b. The Combined PAF cannot be used if:
 - i. There are multiple third parties involved.
 - ii. The file will be going to different FSP Licensees.
 1. Customer can sign a new PAF for the other FSP.
 2. Customer can sign a new Combined PAF.
19. Can any mail house become a Mail Processing Agent?
 - a. The scope of this PAF is to allow Full Service Provider Licensees the option provide list processing services to companies whose primary business is to prepare mail pieces to be deposited in the mail stream. This PAF is very restrictive in how the data is allowed to be used and does not allow for any information to be returned to the customer.
20. I am a Limited Service Provider Licensee and a mail house. My processes are similar to that of the Mail Processing Agent. Can I use this process to avoid having all of my customers sign a PAF?
 - a. No, the purpose of this PAF is for FULL SERVICE PROVIDER processing only.

SCENARIOS

Multiple Customer Lists

Scenario 1

ABC Company has 3 mailing lists: 'Current Customers', 'Internal Marketing List' and 'Purchased Marketing Lists'.

John Smith, VP is the custodian of the Current Customer List and Fred Jones, VP is the custodian of both Marketing Lists.

ABC Company would sign two PAFs. John Smith would sign for the 'Current Customers'. Fred Jones would sign for 'Internal Marketing List' and 'Purchased Marketing Lists'. For the PAF signed by Fred Jones, the PAF ID on the front would be multiple and both PAF IDs would be listed on the back with the list name.

Scenario 2

ABC Company has 3 mailing lists: 'Current Customers', 'Internal Marketing List' and 'Purchased Marketing Lists'.

John Smith, VP is the custodian of all mailing lists stored in the company's data warehouse.

ABC Company would have one PAF signed by John Smith. The PAF ID on the front would be multiple and both PAF IDs would be listed on the back with the list name.

Multiple Licensees

Scenario 3

ABC Company is an LSP. ABC runs all lists, for all customers through an FSP the first time, then run the lists internally to ABC for all future runs.

ABC Company should get two PAFs, one showing the FSP as a Licensee and ABC Company as the Broker or List Administrator. The second PAF shows ABC Company as the Licensee. The MULTIPLE Broker PAF rules may apply.

Broker Agent Processing

Scenario 4

Jones Hardware Co (Jones') goes to Fred's Mailing House (Fred's) for a mailing to their current customer database. Fred's then contacts Sue's Advertising

Agency (Sue's) to design and create the mailpieces. As part of creating the mailpieces, Sue's submits the Jones' mailing list to an NCOA^{Link} Licensee. In this case Fred's Mailing House and Sue's Advertising agency are BOTH Brokers.

List Rentals

Scenario 5

ABC Company provides mailing services to its customers. Customers hire ABC Company to produce, print and mail for them on a regular basis. ABC Company purchases one or more lists from a list broker for unlimited use and uses these lists to mail the customer pieces. The same lists, or portions of the lists purchased by ABC Company are used for multiple Customers who want to mail to these areas. Customers 'never' see the list, never retain a copy of the list or receive any change of address information from ABC Company. ABC Company maintains, updates and manages these lists. Who is the List Owner and who is the Broker?

As ENTIRE list(s) are processed and no updated data is returned to the List Broker. Then ABC Company is the List Owner. There is no Broker.

Scenario 6

ABC Company provides mailing services to its customers. Any Customer hires ABC Company to produce, print and mail for them on a regular basis. ABC Company purchases one or more lists from a list broker for a 'one-time' or multiple use to create and mail for a specific Customer. This Customer 'never' sees the list, never retains a copy of the list or retains any change of address information from ABC Company. Who is the List Owner and who is the Broker?

Since the list(s) purchase is for a specific customer, that customer is required to sign the PAF as the List Owner, ABC Company would be a Broker if they are not the licensee providing the processing.

Cooperative Databases

Scenario 7

ABC Company houses a cooperative database for 100 companies. ABC Company wants to process this database through NCOA^{Link}. Each of the 100 companies would be required to sign a PAF for the licensee providing the NCOA^{Link} Service with ABC Company as the List Administrator.

Scenario 8

XZ Licensee hosts and processes 'US Residential Co-Op Database' for 50 Customers. XZ Licensee is also a participant in this database. How should XZ

Licensee Complete the PAFs for ALL 51 Participants of the 'US Residential Co-Op Database'.

For the 50 Participants other than XZ Licensee: XZ Licensee should appear as the Licensee and the List Administrator. The same or different parties at XZ Licensee would sign as Licensee and List Administrator. The signatures are dependent on who is responsible for the maintenance and account management of the 'US Residential Co-Op Database' and who is authorized to sign PAFs as the Licensee representative.

For the PAF for XZ Licensee: XZ Licensee should appear as the licensee. There will be no List Administrator except in rare exceptions. An example of this would be when one division owns the data and a different division provides the hosting services.

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