MTAC Task Team #15 By/For

Resolution Statement & Recommendations

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Executive Summary

The Mailers' Technical Advisory Committee (MTAC) Task Team #15's efforts included 16 conference calls between the months of July 19, 2012 and January 24, 2012. The workgroup comprised 23 members from the mailing industry and the U.S. Postal Service®. The industry was represented by mail owners, mail service providers, publishers, printers, consultants, and software manufacturers. The U.S. Postal Service (USPS) was represented by the Payment Technology, Business Mailers Support, Mailing and Shipping Services, and the Business Alliance Network.

The task team directed the "out-of-scope" issue of Nonprofit batch identification to the MTAC User Group One.

The following report provides the task team's recommendations relative to identification of mail owners and mail preparers in Electronic Documentation (eDoc) for Intelligent Mail® Full-Service compliance. These recommendations will be entered into the MTAC MITS tracking system.

Scope of Input

Because it was important to build our recommendations based on a broad base of mailing industry input, each team member was invited to go back to their organizations and associations to solicit input.

On December 4, 2012, in a DMM Advisory and other venues, the USPS requested additional feedback from industry to define a "Mail Owner."

Accomplishments

Identifying Mail Owners and Mail Preparers

The task team reviewed current methods for identifying Mail Owners and Mail Preparers in eDoc and suggested areas of improvement. Because of this review, the

task team provided structure and format for a "By/For tool" that will facilitate data distribution decisions allowing correct construction of data elements used in presort documentation and PostalOne! files. Twenty-eight scenarios from the USPS' Guide to Intelligent Mail for Letters and Flats were reviewed to comprise the "By/For tool." As a result of this review, edits were identified for the guide for clarity.

Attaining Mailer IDs (MIDs)/Customer Registration IDs (CRIDs)

The task team reviewed the current process of obtaining MID/CRIDs from the USPS. The USPS' Business Customer Gateway will be enhanced summer of 2013 to support Mail Service Provider's acquisition of MIDs/CRIDs.

Thresholds for By/For Identification

The task team is divided on allowing a quantity threshold before it is required to identify the "mail owner" in eDoc: some recommend none, some want one; some want options to NOT identify entities, or list the entity that prepares or tenders the mail as the "For" or "mail owner."

Education |Training: Industry and USPS

While the USPS was collecting additional feedback on the definition of a "mail owner" the task team focused on discussing the concept of a By/For tool and other education recommendations.

A By/For tool will assist mailers in making decisions as they identify (i.e., use of CRID or MID) for Full-Service data distribution. This tool is based on the scenarios provided in the Guide to Intelligent mail for Letters & Flats.

Other education efforts discussed where industry efforts used with their employees and customers. Software vendor education was shared with the Task Team co-chairs. Because of the proprietary nature of the content, the task team

recommended that industry work with their individual vendors to obtain additional resources.

Recommendations

The industry and the Postal Service need the definition of "Mail Owner" from the USPS' Executive Leadership Team in order to advance the discussion and desired results outlined in MTAC Task Team #15's issue statement.

Industry requested an explanation: Why is mail owner information is required for Full-Service?

The USPS should complete the "By/For tool" and post it on RIBBS.

The USPS should match the changes discovered from developing and testing the data distribution scenarios that comprise the "By/For tool" into *The Guide to Intelligent Mail for Letters and Flats* for consistency.

U.S. Postal Service By/For Definitions and Thresholds (updated 4/17/2013)

The U.S. Postal Service defined the "for" or the "mail owner" and the "by" or a "service provider/vendor" as well as minimum thresholds required to populate eDoc using a CRID and/or MID in eDocumentation in the April, 2013 Federal Register Notice Final Rule for the January 26, 2014 Full-service automation postage prices.

If the mailing is prepared or presented on behalf of another entity, the electronic documentation (eDoc) must include additional information to support the **by/for** mailing relationships.

Mail service providers (agents) **do not have to provide by/for data for mail owners with 5,000** or fewer pieces in a mailing.

All other mailings must include by/for information.

The mail owner and mailing agent are described as follows:

***Mail Owner*:** The mail owner is the business entity, organization, or individual who makes business decisions regarding the mailpiece content, directly benefits from the mailing, and ultimately pays for postage on the mailpiece directly or by way of a mailing agent.

***Mailing Agent*:** The mailing agent is a business entity, organization, or individual acting on behalf of one or more mail owners by providing mailing services for which the mail owners compensate the mailing agent. A business entity, organization, or individual whose services define it as a mailing agent may also be considered a mail owner, but only for its own mail or the mail of its subsidiaries. Mailing agents include, but are not limited to the following: Printer, letter shop, address list provider/manager; mail preparer, postage payment provider, mailing logistics provider, mailing tracking provider, ad agency, and mailing information manager.

It is the recommendation of this task team that a workgroup be established in one year to review the data and thresholds.

Review of Task Team Efforts

Identifying Mail Owner and Mail Preparer (MIDs, CRID)

USPS needs to explain why a mail owner needs to be identified for Full-Service, and explain how that information will be used for other USPS system dependencies.

Many of the task team members stated they are not comfortable providing their customer's names to competitors (i.e., the United States Postal Service). When the USPS ceases providing services that are in direct completion with services provided by industry, more open discussion can take place around customers who currently are not willing to be identified. A general business rule exists in today's economy guarding proprietary relationships (e.g., any agency that contracts with you for print services would be hesitant to inform you of their direct customer name AND contact information).

While there are many opinions for the definition of a "Mail Owner," three are listed below from the Task Team's discussions.

Opinion 1:

A Mail Owner is a customer (consumer or business) who has the most vested interest in the mail piece content and is having the mail pieces mailed on their behalf. A Service Provider can be both a Mail Owner and Service Provider. A Service Provider is an Owner if the mail preparation is performed on their behalf. However, if the Service Provider's role is not preparing mail on behalf of their own company but on behalf of another company, then they are acting in a Service Provider role not as a Mail Owner.

The case for this opinion is that if a company was utilizing USPS products (mail) and was using a Mail Service Provider (MSP) to prepare their mail and the MSP "disappeared," the company would still be interested in getting their

message and would go to a different MSP. The company would still be a Mail Owner and USPS customer.

Opinion 2:

A Mail Owner is whoever pays the postage, or is directing the mailing.

Opinion 3:

The MLOCR industry requests that the USPS maintain its current definition of a Mail Owner: "the entity paying for the postage." We also support the original USPS eDoc By/For requirements as defined in the Guide to Intelligent Mail for Letters and Flats. The MLOCR industry worked with Karen Zachok and Pritha Mehra exerting a considerable amount of time and effort to create these original requirements. MLOCR mailers have incurred significant cost to implement and maintain these requirements.

We understand the USPS may need to have specific business entities identified in eDoc in order for those entities to participate in USPS incentive programs or Negotiated Service Agreements. We have and can continue to provide that information so customers can participate in those programs.

We do not think, however, it is necessary to change the By/For requirements and are concerned that doing so will needlessly increase the cost of mailing, which will have a detrimental effect on the USPS and the mailing industry. For these reasons we recommend that the USPS keep the original Mail Owner definition and eDoc By/For requirements as stated below. These original requirements were taken from the USPS "Guide to Intelligent Mail for Letters and Flats" version 6.3 Dated August, 2009.

"Typically, the mail from each Mail Owner will be run separately on a machine and information captured from that process will be used to identify the Mail Owner in the By/For section of the electronic documentation for those mailpieces. If that mail already contains mail from multiple mail owners, the MLOCR Mailer would populate the By/For section of the electronic documentation to identify the single source of that mail (i.e. the MLOCR Mailer's customer).

When a Mail Owner has provided a small amount of mail, the MLOCR Mailer has the option to combine that mail with mail from other low volume Mail Owners and will not be required to identify the Mail Owners associated to those mailpieces. The MLOCR Mailer is allowed to jackpot mail from customers who individually provide less average daily volume than 1% of the total average daily volume processed at the MLOCR Mailer's facility or 3,000 pieces (whichever is less). If the MLOCR Mailer chooses to jackpot multiple customers using their own MID, they will be responsible for the address quality of those pieces.

When mailpieces are rejected on an operation and grouped together across Mail Owners to be re-run on a MLOCR machine, those mailpieces may use the Mailer ID of the MLOCR Mailer and will not be required to identify the Mail Owner in the electronic documentation. If the mailpiece is not successfully processed when rerun, that mailpiece will be mailed at machinable or single-piece prices and may or may not have an Intelligent Mail barcode applied."

Attaining Mailer IDs/CRIDs for By/For identification

The task team reviewed the USPS' current process of obtaining MID/CRIDs and made recommendations for improvements:

- Recommended online capability for service providers to obtain MIDs/CRIDs on behalf of their customers
  - MID/CRID lookup tool
- Clarify the confusion resulting from multiple MIDs required for the various USPS products: Priority Mail, Packages, Letters/Flats
- Provide consistency in the USPS documentation when discussing identification numbers (e.g., some documents reference USPS ID without specifying if that ID is a MID/CRID or other).

Thresholds for By/For identification

The task team is divided on allowing a quantity threshold to identifying the "mail owner" in eDoc. Some of the members:

- recommend none;
- want one (consistent with other USPS system limits (e.g., 10,000 Wizard, or 5,000 EDDM);
- recommend none if "Mail Owner" is not participating in any USPS incentive programs;
- recommend none if "Mail Owner" does not want to manage any data (i.e., ACS, Start the Clock);
- recommend options to NOT identify entities, or list the entity that prepares or tenders the mail as the "For" or "mail owner."

The task team was not able to advance the discussion because of the lack of the definition of a mail owner from the USPS' Executive Leadership Team.

Thresholds for Different Mailing Scenarios

There should be consideration in creating rules/ thresholds when:

- Mail from a mail owner goes through multiple service providers before being entered with the Postal Service
- Multiple customers with small volumes
- Other impacts such as need for nonprofit identification Thresholds and identification of Mail Owner related to NCOA Link® path may be in conflict
- Thresholds and identification of Mail Owner related to NCOA Link path may be in conflict (i.e., ALL NCOA Link processing is required to be reported).

Scenarios that Demonstrate Challenges of Using By/For

It can be difficult to identify the "original mailer" because of the complexity of a total mailing program: Name on mailpiece, advertising agency (program requirements), data provider, presort vendor, printer, mail preparation, and transportation.

- For some mail service providers, there might be several other service providers between the first service provider and the mailer
- Comingled
  - Some providers charge additional if a customer asks to be identified because the customer's mail will be separated
- Combined mailings (i.e., different names or promotions on the mailpieces).

Educating / Training

The task team discussed the importance of appropriate, concise, and timely training:

- Update "Guide to Intelligent Mail for Letters & Flats."
- Provide a "Quick Service Guide" for MIDs & CRIDs.
- Continue webinar program that will post PDF of slide deck and a recording when available with updates when changes are made.
- Continue DMM Advisories for updates
- The USPS should complete the development of the By/For tool that will be used to make decisions in using CRIDs or MIDs for Full-Service data distribution.

The task team recommends that mailers reach out to software vendors based on the product used to generate presort and associated output. Each vendor's unique software provides varied ways to populate eDoc. Populating the appropriate field in the mailing job's presort (that generates the Mail.dat file) differs depending on the software vendor. The vendors participating in the task team acknowledged they can make the training materials available to their customers.

Appendix 1: Task Team Issue Statement

Full Service requires accurate identification of mail owners and mail preparers in the eDoc. This Task Team is proposed to promote accurate recording of mail owner and mail preparer information for Full Service mailings.

Task Team Originator Pritha Mehra

Desired results

- Review current methods and suggest improvements as necessary for:
    - Identifying Mail Owner and Mail Preparer (MIDs, CRID)
    - Attaining Mailer IDs/CRIDs for By/For identification
- Review and recommend thresholds for By/For identification
- Review and suggest improvements as necessary for educating/training industry/USPS

Impact on Other Issues/Procedures

1. Mail Service Providers & Mail Owners – Mail preparation processes, acceptance and verification business processes, business mail entry access channels, mail induction processes
2. USPS mail acceptance/verification

Area of Focus Acceptance

Sponsors Pritha Mehra, Angelo Anagnostopoulos, Dale Miller

Appendix 2: Task Team Roster

Task Team Member	Company
Angelo Anagnostopoulos	GrayHair Software
Dorothy Bach	World Marketing - Atlanta
Shawn Baldwin	BCC Software
Beth Bigelow	USPS
Lisa Bowes	intelisent
Neil Dean	USPS
Kevin Elkin	RR Donnelley
Bob Galaher	NAPM
Linda Gustason	Quad Graphics
Dennis Kaylor	Our Sunday Visitor
Steve Krejcik	Pitney Bowes Presort Services
Roger Mancilla	First Data
Dan O'Brien	TD Ameritrade
George Rader	DST Output
Susan Redman	USPS
Laine Ropson	Ropson & Associates
Wanda Senne	World Marketing
Franklin Spencer	USPS
Michael Tate	Bank of America
Phil Thompson	Quad Graphics
Brenda Washington	USPS
John Whittington	Time Customer Service
Travis Wirth	First Data