

MAILERS' TECHNICAL ADVISORY COMMITTEE TASK TEAM #16 - FINAL REPORT

TINPA Technical Issues related to Non-Physical Addresses

November 27, 2012

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MTAC TT #16: EXECUTIVE SUMMARY OF FINDINGS AND RECOMMENDATIONS

THE MTAC TT #16 categorized 8 items related to non-physical addresses. The detailed findings and recommendations can be viewed in the section following the Task Teams recommended next steps. The purpose of this Executive Summary is to define the high level topics and recommendations to the MTAC Sponsors.

Overall Themes/Issues:

- 1: No physical indicator of PBSA addressing in the address itself.
- 2: Need to determine when and how to uniformly enforce Pub 28 requirements related to CMRA's and new requirements for PBSA to ensure proper use of designators.
- 3: Current databases and CASS processing resulting in misleading and/or inconsistent address information (flags and footnotes) for various types of non-physical addresses.
- 4: Make address information (such as PO BOX only ZIPs) more readily available for use by mailers.
- 5: Initial assignment of PBSA secondary numbers (when there is a conflict) does not allow for future growth.

Overall Recommendations:

As a number of recommendations have corresponding changes in Address Quality products, initial a new CASS / Address Quality cycle. When evaluating implementation options, the focus was on reasonable options that allow for a 2014 implementation date.

- 1: Establish a unique physical indicator (designator) for PBSA's
- 2: Uniformly enforce designator naming conventions for CMRA's and PBSA's
- 3: Review USPS database and resulting address flags, footnotes, and additional elements (such a Carrier Route) for accuracy and consistency of values across the different variations of CMRA and PBSA addresses as well as for other types of non-physical addresses (such as the use of R777 and throwbacks). Make changes to databases and CASS procedures as necessary.
- 4: Investigate making additional data available for PO BOX only zips as well as additional flags / indicators with new addresses (from ACS and NCOA^{Link}).
- 5: Review assignment of alternate Unit values for PBSA addresses when there is a conflict to allow for expansion to avoid future conflicts.

MTAC TT #16 REPORT and FINDINGS

Issue Title: TINPA (Technical Issues related to Non-Physical Addresses)

Issue Statement:

A new Post Office Box address style designed to be a street-style address has been rolled out to approximately 8-9M customer boxes. In MTAC User Group # 5, the industry identified several concerns/issues related to the street-style address approach and raised questions related to its program implementation. The Postal Service maintains address information to serve operational needs related to the mailing function, and thus considers issues regarding the use of address information for non-mailing related purposes to be outside the scope of MTAC. However, other technical solutions may be identified through a Task Team focused on determining whether reasonable and viable additional options can be developed to assist mailers in the identification of non-physical addresses, taking into consideration the fairness of the proposals to the impacted parties

Background on the Workgroup:

Mailers in many industries have regulations that impact operations based on the type of address provided by their clients. One such requirement is to know when an address is a person's physical address vs. where they receive mail from the USPS. This and related requirements became a prime topic of conversation and concern when the USPS launched their program to Move to Competitive Street Addressing for PO Boxes. Those conversations subsequently prompted additional conversations on other types of non-physical addresses and the impacts on mailing and general business operations.

The Mailers Technical Advisory Committee (MTAC) established Task Team #16 focused on determining whether reasonable and viable additional options can be developed to assist mailers in the identification of non-physical addresses, taking into consideration the fairness of the proposals to the impacted parties. The desired results were:

- Determine whether reasonable and viable additional options can be developed to assist mailers in the identification of non-physical addresses
- Give due consideration to the fairness of the proposals to the impacted parties
- Propose technical solution options

Task Team Organization:

The Task Team consisted of Mail owners, Software Vendors, and the USPS. The workgroup met in person and over conference calls as a team. The Task Team started by working to identify and define all of the current types of non-physical addresses, their identification and handling characteristics along with an example of each.

The Task Team identified and discussed eighteen (18) issues with recommendations by consensus. These are documented in the issue and recommendations section below.

Next steps:

It is recommended that that USPS take a close look at and review the individual recommendations. The recommendations related to the definition and consistent application of address characteristics in USPS databases should be reviewed with changes implemented as soon as reasonable possible. For the other recommendations, the Task Team recommends implementation of a new CASS/Address Quality cycle ASAP. Initial discussions suggest that a 2014 implementation date is feasible.

Task Team’s Detailed Issues & Recommendations:

The Task Team’s recommendations fall into eight (8) categories detailed below. Several require changes in CASS and potentially other Address Quality products. As such, the Task Team recommends implementation of a new CASS/Address Quality cycle. Initial discussions suggest that a 2014 implementation date is feasible. But, it is understood that a complete determination and evaluation of all CASS cycle changes by the USPS, Vendors, and Mailers is required to make a final schedule determination. Additionally, it is believed that some of the recommendations (including those involving CASS) can be implemented prior to a coordinated CASS/ Address Quality Cycle.

The recommendations below include some specific implementation options and details. It is understood that upon a deeper evaluation of implementation solutions that the actual implementation details may need to vary.

If, upon evaluation, the USPS identifies the need for variations from, or in addition to the details in the recommendations below, a review is to be performed with the mailing industry prior to finalization to ensure that no conflicts / dual meanings are identified.

All rules / requirements are to be reviewed with the industry prior to finalization to meet the need for transparency to all to be able to see and review.

For each recommendation, the USPS should evaluate if it is possible for CASS engines to optionally implement changes earlier than the next scheduled CASS release. It is understood that this will not be possible with all recommendations.

Item #1: No visible indicator in the address to indicate a PBSA

Task Team Issues: #1

Recommendation:

Create a readable indicator in the address. This is to be a unique identifier of PBSA addresses. Therefore, vs. a CMRA (so cannot use PMB, #, or any existing secondary designator). Use an indicator that does not have another meaning in the Postal Industry nor other industries (where it could appear in the address). The team recommends for consideration:

PBSA	<u>P</u> O <u>B</u> ox <u>S</u> treet <u>A</u> ddress
PBSE	<u>P</u> O <u>B</u> ox <u>S</u> treet <u>E</u> quivalent

NOTE: “PBSA” will be used through the rest of this document to represent the new designator for use in PO BOX Street Address Equivalents.

Regulations are to treat the required use of “PBSA” in alignment with the requirements for the use of “PMB” with CMRA addresses.

There are multiple ways that support of this new identifier can be implemented, To minimize the overall amount of development, the Task Team recommends an implementation option that

does not require modification of databases, but to have CASS implement support by detecting PBSA's and overriding the designator to be "PBSA".

NOTE: any policy changes regarding naming convention will also need to be updated in the PBSA policies and shared with the box owners.

Because of the nature of this recommendation, this may require that activation of support for the new designator to be based on a specific date - so that all products implement support at the same time.

Item #2: Many mailers and the USPS have observed that incorrect / improper designator is being used with CMRA addresses (i.e. "UNIT", "APT", "STE" instead of as documented in DMM 508.1.8 to use "#" or "PMB").

Task Team Issues: #2

Recommendation:

USPS is to evaluate current policies to help mailers in the visual identification of CMRA's through the enforcement of the use of the proper designators. These policies should apply correspondingly to PBSA's as well.

It is understood that this issue is complicated with CMRA's as the secondary numbers are neither regulated, controlled, or known to the USPS - unlike with PBSA's. The key issue is if / when CASS can take an address detected as a CMRA that has additional designator information, but is not using "#" or "PMB" and properly make the interpretation that this information is the PMB information - and treat accordingly.

It is also important to remember that the secondary designator "#" has the additional meaning of indicating that the secondary address information is not recognized by the USPS.

The suggestion for evaluation is the enforcement by CASS of the following scenarios:

Input Scenario	Output Designator
CMRA with "PMB" designator	PMB
CMRA with "#" designator	PMB
CMRA with other than "PMB" or "#"	PMB
PBSA with "PBSA"*	PBSA*
PBSA with non "PBSA" but valid Secondary Number	PBSA*
PBSA with "PBSA" or a non "PBSA" and invalid Secondary Number	PBSA* with no ZIP+4, leaving the Secondary Number on the piece

* The designator determine to be used for PBSA addresses

Item #3: For both CMRA and PBSA addresses, existing flags (especially DPV flags and footnotes) being set incorrectly and/or inconsistently by CASS products. Additionally, discrepancies found in the USPS supplied data files.

Task Team Issues: #6, #9

Discussions include the issue regarding the consistency of where mailers need to look to determine the characteristics of an address. Currently, some flags are in the CRRT, some in the DPV Footnotes, etc....

Recommendation:

The USPS should review the current codes to establish and document standards for CASS in the setting of these values for both CMRA's and PBSAs. Additionally, evaluate the creation of a central location and set of codes that mailers can use to determine the type of the address.

Specific examples and recommendations for consideration:

- If CMRA address that is complete with a resulting designator of "PMB", then DPV = Y
- If CMRA address that is complete with a resulting designator of "#", then DPV = S
- Address of a post office had a carrier route of C771 indicating a PBSA address, but it was not flagged as a CMRA.
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- Many of the special types of addresses identified have unique DPV footnote codes (such as General Delivery, Military, and Unique Zip). The USPS should evaluate the creation of additional DPV Footnotes to identify the other types of addresses including:
 - o PBSA – separate codes from CMRA. 3 codes needed: Match PBSA info, PBSA with missing PBSA number, PBSA with invalid PBSA number
 - NOTE: if the recommendation for separate codes is not implemented, then the DPV Footnotes for CMRA's should be redefined to include PBSA's and CASS should handle accordingly. Specifically, a valid PBSA address should generate a DPV Footnote of RR instead of R1 (as is currently occurring). And, to handle when the PBSA number is not valid, R1 would need to be redefined to indicate that a valid number is missing – or simply that the number is missing or invalid.
 - o PO BOX address in PO BOX Only ZIP
 - o Gopost addresses
 - o R777 addresses
 - o NoStats addresses

Item #4: Need to determine how CASS is to handle dual address that could be box PBSA or PO BOX: "pbsa street BOX 123"?

- A) change BOX to the PBSA designator**
- B) change to PO BOX 123 (not always valid)**
- C) fail record**

Task Team Issues: #5, #8

Recommendation:

CASS procedures and regulations should anticipate variations and describe the expected coding results.

When reviewing the CASS coding requirements for PBSA addresses, discuss and review exception cases and how they should be handled. For example: UG #5 has identified an issue with addresses with "BOX" and "DRAWER" being used as the secondary designator that CASS uses as a trigger to convert the entire address to a PO BOX address (whether in a separate address line / field or not).

Item #5: On ACS and NCOA^{Link} new addresses, no indicators of CMRA nor PBSA.

Task Team Issues: #12

Mailers who need to be aware of new addresses that are a CMRA or a PO BOX can look for the "PO BOX" string in the address but must run the new address through CASS to detect a CMRA or PBSA. This would allow for an indicator in the address itself via ACS (but not via NCOA^{Link}) when the new address is a PBSA. For NCOA^{Link} detections, a file like the posted list of PBSA

addresses would need to be shipped with the NCOA^{Link} data by the USPS and evaluate by the NCOA^{Link} software.

Recommendation:

Per the creation of a unique designator for PBSA's, the USPS should support the use of that designator in ACS notices.

The USPS should consider the inclusion of a PBSA file that can be quickly and easily analyzed by NCOA^{Link} to detect and flag when a new address is a PBSA – this feature should be optional so that performance is not impacted for those who do not require this information. By extension, consider inclusion of a similar file for identification of CMRA addresses (would require additional security on the file and lookup – such as a DPV style data file and lookup).

Additionally, when processes are being designed / redesigned in the future, factor in the need for the provisioning of additional flags and indicators to identify PO BOX, PBSA, and CMRA addresses without the need of additional analysis or processing of the returned new addresses.

Item #6: Need to increase awareness of mail recipients when have / using address with unique Change of Address requirements.

Task Team Issues: #13

Recommendation:

Add information to the Change of Address confirmation letters when the new address has unique characteristics regarding future COA activities. Specifically, indicate to mailers any additional activity they will need to perform upon a future move (example: if COA is not allowed from the new address, mailer needs to know that they will need to directly notify everyone who currently mails to them of the change of address as they USPS will not provide that information to the mailers).

Send back to UG#5 to pursue further discussions and resulting actions.

Item #7: No list of PO BOX only ZIPs

Task Team Issues: #14, #6

Recommendation:

USPS should investigate ability to provide a list of PO BOX only ZIP's. Mailers can utilize the list to evaluate addresses as part of their mailing operations.

NOTE: the recommendation in Issue #6 is to create a DPV flag for each type of non-physical address which would, therefore, work to identify records in PO BOX only zips. This should be considered when evaluating the potential solutions.

Item #8: When Post Office at address with Secondary Address information, PBSA values were adjusted to avoid conflicts with current, existing addresses, but did not allow for potential expansion in the future.

Task Team Issues: #18

Recommendation:

USPS should review the addresses with conflicts to determine if expansion is possible in the future at those locations. If so, make adjustments to shift more addresses now to avoid having to deal with conflicts in the future.

Additionally, it has been determined that the PBSA data has been changing over the year without notification to mailers. As this data (especially the file on RIBBS) was expected to be static, should be notification to mailers when the data (file) changes. The key change identified was the removal of some Unit ranges that were being used to address when these types of conflicts occurred. Rather than remove support for PBSA addresses for these PO Boxes, evaluate how to keep support and avoid conflicts using one of the two techniques that are still in use for some of these addresses:

- Create a new range of Unit values for the PO Boxes with conflicts or potential conflicts (for example, PO Boxes 1 – 10 have PBSA Units of 3001 – 3010)
- All PBSA units values shifted to ranges well outside of the range of other secondary values at the location (for example: Address with STE's 1-15, so PO Boxes 1 – 500 have PBSA Units of 7001 – 7500)