

NPF Meeting – COM Workgroup #170

Meeting place - National Postal Forum

Date & Time – March 23, 2016 11:00 AM Central

Attendees;

USPS Leadership: Gary Reblin, Steve Montieth, Karen Key

Industry: Co-Chair, David Marinelli, Cyndi Muldoon

Participants: Sharon Harrison, Steve Colella, Mike Tate, Darlene Wolf, Ken Metroff,
Pam Kalvaitis, Robert Wesholski, Steve Krejcik

Purpose – Walk through Workgroup 170 Final Resolution Statement version dates 2.16.16 and 3.3.16

Discussion;

Postal has agreed to Two Tiered approach, COM rates will be handled through normal rate changes process. Postal has submitted the Business Needs Request for the 2 tiers structure, which may be available with January release.

Postal would like to understand what are the specifics driving costs for mailers with requirements to making the updates to facsimiles, i.e., nearly identical, page numbering X of Y, etc.

The new Postal forms are available on USPS.com, specifically the Ps 3665, Ps 3606. Mailers can go to the website and download the forms for use.

The automated COM tool is on target for June 2016 timeframe pending approval for funding. USPS will inform mailers when approved and date of implementation. Reviewed the functionality of the tool, as a solution for uploading information for COM, with IMpb or use the tool with or without IMpb. Mailers who do not provide the IMpb will pay the higher rate.

Concern – if the tool is not approved by June mailers will only have 12 months to be complaint to update forms for the June 2017 date.

Gary relayed that any mailer can go to the USPS to explain the situation to seek approval for additional time that is needed in order to be complaint with the updated form requirements. This was received as reasonable offer working with the Industry.

Concern – Nearly Identical related to Facsimiles

Gary wanted to understand the issue. The form for example 3877 is for Accountable mail and if the service requested is for COM domestic, use 3665 form. The Postal Service is seeking to have the forms contain the same information; information that is needed is included. Industry wants know if items that are not needed are required to be on the form. Postal is driving this as a need to have standardization within the Service. Industry expressed the concern with the requirement to have the X of Y as it will require significant IT cost to add to facsimiles, currently forms have the individual page numbers. Postal has stated that at the simplest level, mailers must use the correct form.

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* Postal has stated they will review the language to determine if they are able to define COM nearly identical wording differently. They will review with legal the requirement of the X of Y numbering on the forms. Steve and Gary have agreed to respond back to workgroup with 2 weeks.

Concern- Mailers are sending forms for approval to address provided, in some cases there has been no response for over 2 months. Ken Metroff plans to send recent form request for approval direct to Steve Montieth.

Mailer's need to have an official letter, something in writing from the USPS to share with local Postmaster's, primarily to indicate that the mailer has approval to mail while in the process of transitioning to the new form. *Gary and Steve will review a letter that can be provided for this purpose.

Concern - Currently mailers will bring forms needing correction, i.e. Missed stamps, omissions or illegible markings back to DMU clerks for correction. The new requirement stated that it needs to be done by management exclusively. Postal has stated that appropriate management can "delegate" authorization to appropriate BMEU or DMU for corrections.

Concern - The 3 day period to allow for corrections.

Discussion centered on the mailers process, mailings occur Monday – Saturday and their process can include dropping off large volume COM on day 1 and returning the next day to pick up the forms. In many cases, mailers have implemented quality checks of the paperwork which can take additional time. A mixture of the process and human error, some errors can go undetected for a longer period of time. Mailers are concerned that this rule could cost a company thousands of dollars in litigation fees if the error is not detected within the 3 days.

The meeting concluded at 12:00 PM. Follow-up meeting will be scheduled the week of 3/28.

Open items;

Follow meeting Scheduled

* Postal will review the language to determine if they are able to define the COM nearly identical wording differently.

Postal will review with legal the requirement to have X of Y numbering on the forms. Steve and Gary have agreed to respond back to workgroup with 2 weeks.

*Gary and Steve will review a letter that can be provided indicating mailer is approved and remains so during the time they are transitioning to new forms.

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Follow-Up meeting from the Postal Forum Discussion

Meeting place – Conference call

Date & Time – March 28, 2016 2:00 PM Eastern

Attendees;

USPS Leadership: Gary Reblin, Steve Montieth, Karen Key

Industry: Co-Chair, David Marinelli, Cyndi Muldoon

Participants: Sharon Harrison, Steve Colella, Mike Tate, Darlene Wolf, Ken Metroff,
Pam Kalvaitis, Robert Wesholski, Steve Krejcek

Purpose – Complete the walk through Workgroup 170 Final Resolution Statement version dates 2.16.16 and 3.3.16

Issue: COM Tool

Discussion:

- Agreed to hold follow-up discussion or open new workgroup should the tool not be produced
- Agreed that mailers will review requirements and help with use cases prior to development (From Postal Forum Meeting)
- Steve to look into payment of COM Fees with the Tool. Will mailers have the option to pay fees page by page or on a summary page? Will page by page payment be needed by mailers if the tool produces a summary page? (Dave to vet this with mailers)

Issue: Facsimile Forms

Discussion:

- Steve to review the need for the 3877 for International
- DMM language will need to be updated. Steve suggested creating a new entry regarding COM Facsimile forms to make clarify the “nearly identical” standard which will apply to COM forms as this standard will be different than for other forms. The COM form standard can allow for custom fields needed by mailers and may allow for removal of fields not needed/used by a mailer.

Issue: “3 Day” Rule

- Steve will work on getting this rule updated to clarify that the 3 days starts upon return of the forms to the mailers, not from the mailing date.

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- Dave also asked that Mailers would be able to approach Postal for issues arising past 3 days on a case by case basis

Issue: COM Fee Payment

- Mailers using facsimile forms will have the option to pay COM Fees via meter strips on each COM form or on the summary page.
- COM fee payment for Mailers using the tool is TBD (see last bullet under COM Tool Issue)

Issue: Implementation Timeframe

Discussion:

- Steve to review time frame with Gary
- Discussed if 12 months from June 2016 will be enough time for both Postal and Mailers.
 - Postal may need additional time to elevate the tool
 - Mailers want more time
 - Regardless of timeframe, Postal will have an exception process for mailers who cannot meet the implementation date.

Issue: Communication

Discussion:

- Steve will work with Gary regarding putting out a communication to let industry know that we are working through the issues arising from the final workgroup meeting.
- Postal will of course also put out a communication once the final plan is complete
- Dave will hold off putting out any communication to the workgroup until Steve has a chance to talk with Gary regarding the issues discussed in our follow-up meeting.
- Dave and Steve discussed ensuring that both Postal and Industry are on the same page with the final requirements and that we communicate the same message given the past disagreements in the workgroup.