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PRC Approves Proposed Rates

In a May 27 order, the Postal Regulatory Commission approved the prices that the Postal Service had proposed on April 6. After reviewing that filing, the PRC concluded that "... the planned price adjustments, including workshare discounts, are consistent with [PRC regulations] and applicable Commission directives and orders [and] are also consistent with the pricing requirements [in statute] The Commission also concludes that the planned classification changes, with the revisions described in the body of this Order, are consistent with applicable law. ..."

As a result, the charts contained in the April 11 issue of *Mailers Hub News* show the same rates as were approved by the commission; those charts are repeated at the end of this issue. As the Postal Service had previously stated, the revised prices will take effect at 12:01 ET on Sunday, July 10.

Whether the USPS will propose another semi-annual rate increase in October (for January 2023 implementation) remains to be seen.

USPS Hints at Revising NGDV Order

In a June 1 press release, the Postal Service stated it would be revising portions of the Environmental Impact Statement it had issued previously related to the purchase of Next Generation Delivery Vehicles.

That document had been criticized by various parties for how it evaluated the agency's choice to purchase mostly conventionally-powered trucks, rather than electric vehicles. Criticism of the USPS plan continued even after its initial order for 50,000 units, placed last March, included a "minimum" of 10,019 electric trucks.

Delivery changes

The Postal Service's recent announcement followed comments by the Postmaster General at the National Postal Forum in which he alluded to future changes in the agency's delivery operations. Claiming that carriers now operate from "almost 19,000 facility locations," DeJoy intends to consolidate them into larger "sort and delivery centers, with modern building systems and adequate space, docks, conveyors, and mail, and material handling equipment to operate more efficiently."

The consolidation would result in reduced transportation requirements from plants to delivery units, but carriers' travel time (and mileage) from the centers to their routes would increase. Accordingly, the USPS stated,

"These proposed improvements to the Postal Service's delivery network may alter the appropriate mix of vehicles to be procured under our NGDV contract. ... It may also streamline the charging

infrastructure for electric vehicles, as it would reduce the number of facilities where charging installations are needed and it would permit the upgraded electrical systems and infrastructure that are needed for the task. This available industrial infrastructure significantly reduces the risks associated with deployment of new electric vehicles to facilities with less robust infrastructure."

Though it offered no specifics, the USPS continued;

"The Postal Service's NGDV plan currently calls for the procurement of at least 10 percent battery electric vehicles (BEVs), but it is designed to increase the number of BEVs in the mix as financial resources become available and as the Postal Service refines our network and vehicle operating strategy. ... To examine the environmental impacts of the potential delivery network changes to our delivery fleet mix, we will soon publish a Notice of Intent to supplement the Final Environmental Impact Statement for the NGDV, pursuant to the National Environmental Policy Act. The Postal Service also intends to explore options for accelerating the production of the initial 10,019 BEVs towards the front of the production line and anticipates taking advantage of the flexibility built into the contract with Oshkosh Defense to increase the number of BEVs purchased in the initial delivery order. ..."

The PMG acknowledged that the changes to delivery operations "will take years to accomplish" given that both processing facilities and existing delivery units will be impacted. In turn, it's unclear how those operational changes will be aligned not only with vehicle deployment but with USPS Connect Local and USPS Connect Local Mail, initiatives designed to provide overnight or next-day service, predicated on mail deposit at the local post office or delivery unit.

PRC Opens Inquiry into USPS “Gift Cards”

In a notice published in the May 20 *Federal Register*, the Postal Regulatory Commission opened a docket (MC2022-60) to examine “the potential need to make modifications to the Mail Classification Schedule”:

“Specifically, the Commission seeks information on the Postal Service’s recent pilot program in which it added to the accepted payment methods, at specifically-identified Post Offices, in order to allow postal retail customers to exchange payroll and business checks for stored value Gift Cards (Pilot Program). The Commission seeks the information to determine whether the Pilot Program has changed the nature of the Competitive product at issue (Special Services – Greeting Cards and Stationery) to the degree that the Gift Cards price category (or an undefined sub-component) may be categorized as a non-postal product. A finding that the price category, product, or sub-component is a non-postal product would require its termination.”

Under the radar

The Postal Service has been authorized to sell stored-value “gift cards” since 2014, but the premise for approving that product was that it was “‘likely to be mailed, similar to greeting cards and stationery’ and was often involved in the sale of other postal retail products such as greeting cards.” At that time, the Postal Service stated that it “‘d[id] not intend to use th[e] filing as a step into offering banking services,’ and if any Postal Service proposal should ever offer banking services, ‘such proposals would be done in a separate filing.’”

However, last September 13, the USPS began a “pilot test” of letting customer pay for gift cards with a business or payroll check of \$500 or less, essentially cashing those checks and applying the amount to a card, and charging a \$5.95 service fee. The service was minimally publicized even in the area of the four test post offices (Falls Church (VA), Washington (DC), Baltimore, and The Bronx), which may explain why only six cards were sold, and only \$35.70 in fees was generated.

Regardless, when the pilot test was noticed, and the PRC asked for more information:

“The Postal Service stated ... that ‘no new products or services are involved,’ but the market research referred to in [its response] suggested that the new payment option is targeted specifically at a market looking for financial services. ... The Postal Service’s own promotional materials market the product using the language, ‘Need to “cash” a check?’ The Postal Service’s payment change coupled with changes in the marketing and planned usage of the product have the potential to change the nature of the product, thereby necessitating the examination of the impact of the Pilot Program to the underlying Gift Cards product.

“Additionally, although the Postal Service asserts that the Gift Cards product was already approved by the Commission, the approval of the product was based on the premise that the availability of Gift Cards ‘stimulates demand for postal services’ and ‘enhances the use of the mail.’ ... The Postal Service’s evidence ... demonstrated at the time that the majority of Gift Cards sales not only involved the purchase of other postal items but were more likely to be mailed than Gift Cards purchased elsewhere. ... From September 13, 2021, to January 12, 2022, a total of six Gift Cards were purchased under the Pilot Program (using the business or payroll check payment method) generating a total fee revenue of \$35.70. ... Additionally, the Postal Service provided the total fee revenue for the Gift Cards associated with business checks in Quarter 2 of \$5.95, representing one single transaction. The

Commission notes that under the current Pilot Program, none of the transactions have involved the sale of other postal products. Furthermore, the Postal Service does not track whether Gift Cards are mailed (regardless of the method of purchase) and has not made an attempt as of yet to determine via surveys or other tools whether customers are likely to mail the Gift Cards purchased under the Pilot Program. ...”

Escalation

The PRC had issued instructions to the USPS earlier this year but got a dismissive answer from the agency:

“In its FY 2021 Annual Compliance Determination (ACD), the Commission directed the Postal Service to report quarterly information on the Pilot Program, including updates on volume and revenue, as well as future plans for the Pilot Program as long as it remains in effect. In addition, the Commission directed the Postal Service to file a notice of termination with the Commission when the Pilot Program ends, including notification no later than 14 days after the publication of the ACD of whether the Postal Service is continuing the program past its initially anticipated end date of March 2022.

“The Postal Service provided a response to the Pilot Program ACD directive, stating that ‘the Postal Service has continued the pilot program,’ and ‘[n]o final determinations have been reached with regard to ending the pilot, or with regard to any other potential steps that might be taken to modify the pilot.’ The Postal Service further stated that it ‘remains of the view that the pilot program is an appropriate and limited test of an alternative payment method for the established gift card product, which does not implicate the current Mail Classification Schedule, and that no further regulatory action is warranted at this time.’”

Whether the PRC appreciated the advice of the Postal Service that “no further regulatory action” was needed has not been disclosed. Nonetheless, since the agency apparently has continued its pilot test of not-really-cashing-checks, the PRC has taken further steps, stating:

“The Commission noted in the ACD that should the Pilot Program remain in effect after March 2022, the Commission would initiate this Mail Classification proceeding pursuant to 39 CFR 3040 to explore and review the issues discussed in the ACD. During this Mail Classification proceeding, the Commission will conduct information gathering to explore and review the product at issue and may determine in the course of this proceeding whether the product at issue, or a defined subunit of that product, must be categorized as non-postal and therefore terminate.”

Observations

In recent months, whether coincidentally with the arrival of Louis DeJoy as PMG or not, the Postal Service has demonstrated two distinct behaviors. When it has no institutional interest (or motive) for taking an action – such as easing the earliest date for the advance preparation of fall mailings – it can generate a host of reasons for why the idea is infeasible. However, conversely, when it wants to do something that outsiders might question – like start a pseudo-check-cashing service – it suddenly develops bravado and a talent for spinning the necessary legal explanations.

Historically, for reasons good and bad, the Postal Service has a tradition of lacking creativity and being risk-averse. Trying to sneak a disguised check cashing service by the PRC may be the wrong approach to breaking that tradition.

OIG Examines USPS “Knowledge Continuity”

It’s a problem for any organization: when an experienced senior employee leaves, odds are that the individual’s institutional knowledge leaves as well. Having someone next in line to replace the individual may satisfy some requirements, but nothing can replace what years on the job had taught.

This has been particularly apparent when a commercial mailer reaches out to an old contact at the USPS to get the accurate or technical information that contact was proficient at providing – only to learn the person had taken a different job or, more likely, had retired.

Examining how the Postal Service is dealing with this situation was the focus of an audit by the agency’s Office of Inspector General. The resulting report, *US Postal Service Knowledge Continuity*, was released May 27.

Background

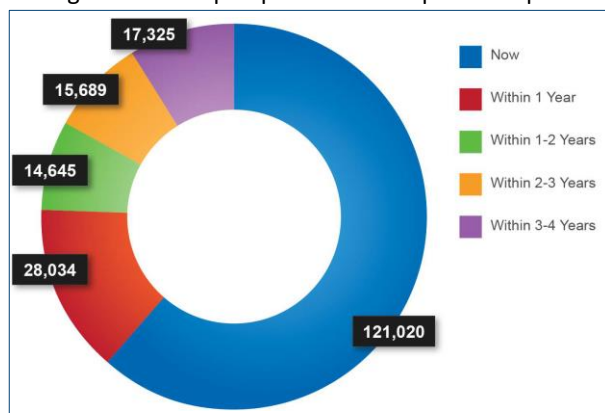
The OIG explained that its self-initiated audit “was to determine whether the Postal Service ensured that it did not lose critical knowledge when employees transferred within or left the organization (due to retirement, resignation, reduction in force (RIF), or other reason).”

The USPS has a Corporate Succession Planning process

“... to identify and develop top-performing employees to become future executives. In addition, a variety of leadership development programs align with competency models to develop upcoming leaders, including Managerial Leadership, Advanced Leadership, Executive Leadership, and Executive Foundations. The overarching program of employee knowledge development is referred to as the learning continuum. During fall 2020, the Postal Service initiated a series of phased organizational changes to improve its ability to implement strategies and drive success. ...

“The objective of CSP is to identify and develop potential future leaders so that they can promptly and successfully assume executive manager positions as they become available[, however, t]he last update to the CSP occurred in fiscal year (FY) 2014.”

The number of employees who are – or soon will be – retirement eligible offers a perspective on the potential problem.



The Postal Service’s 2020 organizational changes, the 2021 RIFs in certain areas, and the resulting cycles of job and location changes were all that many retirement-eligible people needed to motivate their departure. CSP was in place to fill some of those vacancies, but not all.

“As of December 2021, 444 candidates were enrolled in CSP. These candidates are listed as potential successors in 68 available unique talent pools. To be considered as a potential

successor, eligible employees must be nominated by an executive manager during the open season or during an interim talent review. Nominees are headquarters, field, Inspection Service, or executive employees who are recommended as a potential successor for either a talent pool or critical position. The Postal Service measures CSP success through the candidates in each talent pool, including the candidates’ readiness status and the diversity of each talent pool. However, with the recent organizational changes, management has not been able to closely monitor who is in the executive level pools but is currently working on revising these pools to reflect the current organizational structure.”

Findings

The OIG issued a series of findings ...

- **Finding #1: No Standard Knowledge Continuity Plan for Non-Executive Employees.** “The Postal Service had no standard knowledge continuity plan for non-executive functions. While Postal Service headquarters uses CSP for executive-level employees, no standard plan exists for non-executive positions in the field. Division and district managers rely on using personal judgment from ... profiles and competency models as a guide to identifying high-performing employees rather than a formal succession plan process for non-executives. ...”
- **Finding #2: Inadequate Success Measurement for Leadership Training.** “The Postal Service did not adequately measure the effectiveness of leadership development courses by tracking the success of graduates advancing into leadership positions and did not determine the impact of the course for employees’ daily responsibilities. ...”
- **Finding #3: Outdated Corporate Succession Planning Policy.** The Postal Service did not update the guidance used for executive corporate succession planning. The Postal Service last updated Management Instruction, EL-384-2014-1, on July 1, 2014. ...”

... and recommendations.

- “... assess whether a standard knowledge continuity plan would enhance institutional knowledge for non-executive employees and implement it as appropriate.
- “... establish and issue guidance to management within each functional area for consistency when developing and identifying top performing non-executive employees.
- “...enhance the process to measure the success of leadership development courses after completion.
- “... update Management Instruction, EL-384-2014-1, Corporate Succession Planning, to reflect current agency systems and standards, and establish a schedule to review on a regular basis.”

Management disagreed with the first two, but agreed with the third and fourth.

Observations

While it may be important to have a cadre of highly-educated individuals to step into senior manager and executive positions relevant to running the business of the USPS, it’s more important to have an army of qualified people ready to occupy the customer- and commercial mailer-facing positions, and to fill in the myriad technical positions in operations, logistics, business mail acceptance, and, at HQ, functions like mail classification, pricing, and costing. What can only be learned on-the-job is as critical as “book learnin’.” However, the dearth of a “bench” of apprentices preparing to backfill departing senior craft and non-executive employees is apparent – and a problem that’s yet to motivate remedial action by top postal executives.

PQ II Data Shows High Volumes Not In Measurement

Even as the Postal Service continues to issue press releases touting improved service, data it filed with the Postal Regulatory Commission (below) shows that, during PQ II of FY 2022 (January 1 - March 31), significant volumes of mail were not evaluated by the service

performance measurement process. As a result, the service levels asserted by the USPS could be inaccurate given that the those claims are based on measurement of only a portion of the corresponding class of mail.

FY 22 Quarter 2 U/C = Unable to Collect	Total Pcs (RPW-ODIS) (B)	Pcs in Meas (C)	Full-Service IMB Pieces					Total Pcs Not in Meas (H) = (B)-(C)	% Not in Meas = (H)/(B)
			Eligible (D)	Actual (E)	Inc in Meas (F)	Excl fr Meas (G) = (E)-(F)	% Excl = (G)/(E)		
Total First Class Mail	9,696,721,841	5,617,032,170	9,220,387,805	8,888,606,421	5,617,032,170	3,271,574,251	36.81%	4,079,689,671	42.07%
<i>Presort Letters/Postcards</i>	9,552,093,920	5,535,528,933	9,080,542,713	8,759,642,757	5,535,528,933	3,224,113,824	36.81%	4,016,564,987	42.05%
Overnight	1,125,485,451	556,281,870	U/C	U/C	556,281,870	U/C		569,203,581	50.57%
Two-Day	964,333,238	574,248,495	U/C	U/C	574,248,495	U/C		390,084,743	40.45%
Three-Day	3,911,974,590	2,195,614,299	U/C	U/C	2,195,614,299	U/C		1,716,360,291	43.87%
Four-Day	2,452,809,241	1,433,167,339	U/C	U/C	1,433,167,339	U/C		1,019,641,902	41.57%
Five-Day	1,097,491,400	776,216,930	U/C	U/C	776,216,930	U/C		321,274,470	29.27%
<i>Presort Flats</i>	144,627,921	81,503,237	139,845,092	128,963,664	81,503,237	47,460,427	36.80%	63,124,684	43.65%
Overnight	9,213,966	4,611,005	U/C	U/C	4,611,005	U/C		4,602,961	49.96%
Two-Day	16,263,711	7,273,228	U/C	U/C	7,273,228	U/C		8,990,483	55.28%
Three-Day	59,543,838	31,786,091	U/C	U/C	31,786,091	U/C		27,757,747	46.62%
Four-Day	42,548,227	26,893,166	U/C	U/C	26,893,166	U/C		15,655,061	36.79%
Five-Day	17,058,179	10,939,747	U/C	U/C	10,939,747	U/C		6,118,432	35.87%
Total USPS Marketing Mail	15,842,236,346	11,384,746,227	13,328,219,113	13,107,589,138	10,740,830,024	2,366,759,114	18.06%	4,457,490,119	28.14%
<i>High Density & Sat. Ltrs</i>	1,492,398,252	1,173,956,263	1,468,093,967	1,431,320,524	1,173,956,263	257,364,261	17.98%	318,441,989	21.34%
Dest. Entry 2-Day	0	0	U/C	U/C	0	U/C		0	
Dest. Entry 3-5-Day	1,360,829,862	1,050,878,283	U/C	U/C	1,050,878,283	U/C		309,951,579	22.78%
Dest. Entry 5-Day and +	72,673,005	62,545,079	U/C	U/C	62,545,079	U/C		10,127,926	13.94%
End-to-End 3-5-Day	U/C	36,311,086	U/C	U/C	36,311,086	U/C		U/C	
End-to-End 6-10-Day	U/C	21,856,627	U/C	U/C	21,856,627	U/C		U/C	
End-to-End 11-Day and +	U/C	2,365,188	U/C	U/C	2,365,188	U/C		U/C	
<i>High Density & Sat. Flts/Prcls</i>	2,230,874,304	652,101,362	309,472,666	268,647,954	83,779,911	184,868,043	68.81%	1,578,772,942	70.77%
Dest. Entry 2-Day	1,311,480,661	568,321,451	U/C	U/C	0	U/C		743,159,210	56.67%
Dest. Entry 3-5-Day	856,680,627	74,739,238	U/C	U/C	74,739,238	U/C		781,941,389	91.28%
Dest. Entry 5-Day and +	20,358,343	3,051,639	U/C	U/C	3,051,639	U/C		17,306,704	85.01%
End-to-End 3-5-Day	U/C	4,543,419	U/C	U/C	4,543,419	U/C		U/C	
End-to-End 6-10-Day	U/C	1,378,080	U/C	U/C	1,378,080	U/C		U/C	
End-to-End 11-Day and +	U/C	67,535	U/C	U/C	67,535	U/C		U/C	
<i>Carrier Route (Flts and Ltrs)</i>	967,993,072	780,709,753	955,881,775	947,768,812	780,709,753	167,059,059	17.63%	187,283,319	19.35%
Dest. Entry 2-Day	9,415,611	0	U/C	U/C	0	U/C		9,415,611	100.00%
Dest. Entry 3-5-Day	844,770,614	683,317,947	U/C	U/C	683,317,947	U/C		161,452,667	19.11%
Dest. Entry 5-Day and +	85,873,309	80,174,049	U/C	U/C	80,174,049	U/C		5,699,260	6.64%
End-to-End 3-5-Day	U/C	10,611,143	U/C	U/C	10,611,143	U/C		U/C	
End-to-End 6-10-Day	U/C	5,220,313	U/C	U/C	5,220,313	U/C		U/C	
End-to-End 11-Day and +	U/C	1,386,301	U/C	U/C	1,386,301	U/C		U/C	
<i>Letters</i>	10,383,232,913	8,253,743,888	10,009,244,948	9,895,824,755	8,253,743,888	1,642,080,867	16.59%	2,129,489,025	20.51%
Dest. Entry 2-Day	0	0	U/C	U/C	0	U/C		0	
Dest. Entry 3-5-Day	7,571,806,565	6,146,338,858	U/C	U/C	6,146,338,858	U/C		1,425,467,707	18.83%
Dest. Entry 5-Day +	1,203,327,497	1,107,256,955	U/C	U/C	1,107,256,955	U/C		96,070,542	7.98%
End-to-End 3-5-Day	U/C	317,037,256	U/C	U/C	317,037,256	U/C		U/C	
End-to-End 6-10-Day	U/C	658,156,169	U/C	U/C	658,156,169	U/C		U/C	
End-to-End 11-Day and +	U/C	24,954,650	U/C	U/C	24,954,650	U/C		U/C	
<i>Flats</i>	638,054,405	448,640,209	585,525,757	564,027,093	448,640,209	115,386,884	20.46%	189,414,196	29.69%
Dest. Entry 2-Day	0	0	U/C	U/C	0	U/C		0	
Dest. Entry 3-5-Day	318,932,595	230,058,107	U/C	U/C	230,058,107	U/C		88,874,488	27.87%
Dest. Entry 5-Day and +	127,080,481	121,576,924	U/C	U/C	121,576,924	U/C		5,503,557	4.33%
End-to-End 3-5-Day	U/C	22,278,621	U/C	U/C	22,278,621	U/C		U/C	
End-to-End 6-10-Day	U/C	72,999,675	U/C	U/C	72,999,675	U/C		U/C	
End-to-End 11-Day and +	U/C	1,726,882	U/C	U/C	1,726,882	U/C		U/C	
<i>Every Door Direct Mail</i>	129,683,400	75,594,752	0	0	0	0		54,088,648	41.71%
Two-Day	129,683,400	75,594,752	0	0	0	0		54,088,648	41.71%
Total Periodicals	803,828,462	472,476,784	797,663,336	624,413,364	472,476,784	151,936,580	24.33%	331,351,678	41.22%
<i>In-County</i>	106,263,698	9,536,691	99,634,830	U/C	9,536,691	U/C		96,727,007	91.03%
Dest. Entry	U/C	3,884,363	U/C	U/C	3,884,363	U/C		U/C	
End-to-End	U/C	5,652,328	U/C	U/C	5,652,328	U/C		U/C	
<i>Outside County</i>	697,564,764	462,940,093	698,028,506	U/C	462,940,093	U/C		234,624,671	33.63%
Dest. Entry	513,370,990	385,712,236	U/C	U/C	385,712,236	U/C		127,658,754	24.87%
End-to-End	184,193,774	77,227,857	U/C	U/C	77,227,857	U/C		106,965,917	58.07%
Total Package Services	32,259,678	5,691,394	31,718,424	14,115,550	5,691,394	8,424,156	59.68%	26,568,284	82.36%
<i>Bound Printed Matter Flats</i>	32,259,678	5,691,394	31,718,424	14,115,550	5,691,394	8,424,156	59.68%	26,568,284	82.36%
Dest. Entry	29,207,575	5,404,277	U/C	U/C	5,404,277	U/C		23,803,298	81.50%
End-to-End	3,052,103	287,117	U/C	U/C	287,117	U/C		2,764,986	90.59%

USPS Notes: Column B: Data for FCM are based on estimates of the proportion of mail having each service standard using historical data from RPW-ODIS sampling supplemented with data about mail flows by service standard obtained from the Full-Service IMb measurement process. Total Marketing Mail includes only the products listed beneath and does not include Parcels or mail categorized in RPW reports as Domestic NSA Mail. Data are not available at the service standard level for Marketing Mail products mailed with no entry discount because there is no method to capture the service standard for this mail when it is not in measurement. The entry type distribution of pieces is not currently collected for In-County Periodicals. **Column C:** the count of pieces included in the report. **Column D:** the estimate of pieces eligible for FS Intelligent Mail, when available. These data are not available at the service standard level for FCM, because mail which is not in measurement does not have a service standard determination and cannot be aggregated by service

standard. For Marketing Mail, the information is available at the overall class level and product level, but not at the service standard level. For Periodicals, the information is available at the overall class level and product level, but not at the entry type level. For BPM Flats, the information is not available at the entry type level. **Column E:** pieces mailed with FS IMb. The information is available only for the same levels as the data for Column D, except for Periodicals which is only available at the overall class level. **Column F:** pieces included in measurement and had FS IMb. Data are the same as Column C except for products in which measurement is based on mail which is not FS Intelligent Mail. **Column G:** the difference between Column E and Column F. **Column H:** the difference between Column B and Column C. **General Note:** Service performance results for In-County Periodicals are reported using the proxy of all Periodicals, including both In County and Outside County Periodicals.

Arbitration: Myths and Realities in Business-to-Business Agreements

Of late, much ink has been spilled debating the pros and cons of including arbitration clauses in agreements with employees and consumers – and with good reason. An arbitration clause remains the first and best defense against consumer and employee class action lawsuits, although, even there, the terrain is changing with the threat of potentially bankrupting mass arbitrations.¹

But, in the commercial sphere, the question of whether to include an arbitration clause – let alone the particulars of such a clause – often receives little thought. You must give careful consideration to the needs of your business; the nature of the companies with whom you contract and to whom you sell products and services; and the pros and cons of arbitration in different contexts. Otherwise, you can find your business locked in a private dispute resolution process that leaves you in the cold in terms of the ability to defend yourself and obtain the relief you need. Here are some questions and answers to get you started:

- **Is arbitration cheaper than litigation?** The answer is a resounding “maybe,” and often it’s much more expensive than you might think. For example, unlike a court case, the parties to an arbitration are required to pay hourly rates for their arbitrator that can exceed the hourly rates charged by their own attorneys plus travel expenses, with a substantial advance on such fees and expenses generally required before the arbitration can even commence. If your arbitration clause requires a panel of three arbitrators – and sometimes there may be good reason to do so – the arbitrators’ fees and expenses can end up being breathtaking. It’s a good idea to work closely with your legal counsel on the question of how many arbitrators ought to be involved, and whether to designate a specific arbitration organization to provide a list of potential arbitrators from which to select. Some organizations are notorious for having the most expensive arbitrators, but oftentimes they have the strongest candidates as well, including arbitrators with prior experience as state and federal court judges.
- **Is discovery (i.e. pre-hearing information exchanges) less costly and intrusive in arbitration?** Usually, but not always. The amount and kinds of discovery permitted in an arbitration, if not clearly set forth in your arbitration clause, are generally left to the discretion of your arbitrator or arbitrators. Some arbitrators take seriously the idea that arbitration is meant to be streamlined and inexpensive, and therefore may place strict limits on discovery – including the number of written discovery requests and depositions that will be allowed. Others, however, will give the parties significant leeway for discovery (for example, issuing deposition and document subpoenas to third parties across the country). And if an arbitrator decides to open the floodgates to significant discovery, the parties have no choice but to accept that reality. By working with your attorneys, you can craft an arbitration clause that strikes an acceptable balance in terms of the costs and benefits of discovery.
- **Is it true that I can’t appeal an arbitration decision?** It is not an exaggeration to say that overturning a decision in arbitration is among the most difficult burdens in the whole of the law. Unless you can show fraud or misconduct on the part of the arbitrators that tainted the outcome, or some egregious breach of your arbitration agreement, you are unlikely to obtain a reversal of an arbitral award or the right to a new hearing. Indeed, even if the decision is plainly wrong, it will generally be upheld by a court unless the court finds that the error is so profound that no other

arbitrator or judge would ever make such a mistake. Some arbitration organizations, like the American Arbitration Association (the “AAA”), offer an option for an appeal of an arbitration award to a panel of three arbitrators who function more like a court of appeals and have a broader right to reverse or amend an arbitration award. But, to gain access to this costly option (with three additional arbitrators that need to be paid by the hour), it must be provided for in the arbitration clause.

- **Is it difficult to enforce an arbitration award?** Generally not, but enforcement can be delayed by the need to first obtain confirmation of the award by a court of competent jurisdiction. That confirmation process can be significantly prolonged if the opposing party objects to confirmation, files a countermotion to vacate the award, or files an appeal from an order confirming the arbitration award. Contested confirmation proceedings can take many months, and only after confirmation can an arbitral award be enforced against the losing party. And, if you need to enforce the award against an overseas company, expect greater pushback against arbitral awards in some countries. For example, in Taiwan, a special showing needs to be made to demonstrate the arbitration process was fair to the losing party. On the other hand, due to the New York Convention, which has been ratified by over 150 countries, arbitration awards are generally enforced in signatory countries while a court judgment in one country is not automatically enforced in other countries.
- **Can I obtain the same kinds of relief in arbitration as I can in court?** Yes, with some important caveats. First, parties can limit in their agreement not only the kinds of relief that are available in arbitration, e.g., damages, injunctions, and declaratory judgments, but can also shorten statutes of limitations, cap awards, and limit the kinds of damages which can be recovered. Second, you can carve out specific kinds of claims from the obligation to arbitrate, and there may be good reasons to do so. For example, carving out claims for theft of trade secrets or intellectual property violations may be prudent given the benefits associated with going directly to court to obtain swift action without the need for both an arbitration and a confirmation of an arbitration award before a court order can issue to prevent further harm to your company. Your counsel can work with you to include appropriate carve-outs for claims that, for a variety of reasons, are better pursued directly in state or federal court.

These are just some of the nuances associated with the decision to include an arbitration agreement in your commercial agreements. In the right circumstances, arbitration can be the fastest and most cost effective means of resolving business disputes, but its efficacy can often turn on how well your arbitration agreement is crafted to meet the needs of your business.

This article was produced by David W. Bertoni, David Swetnam-Burland, and Eamonn Hart of *Brann & Isaacson* exclusively for Mailers Hub. *Brann & Isaacson* is a boutique law firm that represents large and small online and multichannel companies, printers, commercial mail producers, and IT service providers located across the country. The firm advises companies of all sizes, including many in the Internet Retailer’s Top 500 Guide.

The firm is the Mailers Hub recommended legal counsel for mail producers on legal issues, including tax, privacy, consumer protection, intellectual property, vendor contracts, and employment matters. The points of contact at Brann & Isaacson are: Martin I. Eisenstein, meisenstein@brannlaw.com; David Swetnam-Burland, dsb@brannlaw.com; Stacy O. Stitham, sstitham@brannlaw.com; and Jamie Szal, jszal@brannlaw.com. They can also be reached by phone at (207) 786-3566.

¹ <https://fortune.com/2022/04/18/corporate-america-mass-arbitration-consumer-power-intuit-keller-lenkner/> Any company making online sales to consumers should take this threat seriously and establish appropriate defenses, including revisions to their online terms and conditions.

Politicians Ask for Answers About Stolen Mailbox Keys

Given the repeated articles in the media about lost or stolen USPS collection box keys, and related articles about stolen mail and “check washing” of purloined bill payments, it was inevitable that politicians would sooner or later take notice.

On May 31, US Senators Casey (PA), Carper (DE), Portman (OH), and Toomey (PA) wrote the Postmaster General asking what’s being done to limit the problem, stating:

“I write to express my concern regarding ongoing reports of mail being stolen out of US Postal Service (USPS) Blue Collection boxes. Reports that thieves are accessing USPS Blue Collection boxes to steal and then sort through mail to identify checks that they then use for personal gain are deeply troubling. Americans use the Postal Service to mail checks to pay their taxes and bills; they should not have to worry that those checks may be stolen.

“In August 2020, the USPS Office of the Inspector General released a report that found that the USPS management controls over the universal keys used to access the USPS Blue Collection boxes were ineffective. Specifically, they found that the number of these keys in circulation was unknown, and local units did not adequately report lost, stolen, or broken keys or maintain key inventories. Further, they found that the Postal Service did not restrict the number of replacement arrow keys that could be ordered. Such ineffective controls over these keys increases the risk that they will be lost or stolen.

“I ask that you provide a response to the following questions within the next 30 days:

1. What mechanisms does the USPS have in place to identify and investigate instances in which universal keys have been lost or stolen? How does the USPS plan to improve these mechanisms?
2. What mechanisms does the USPS use to identify instances in which keys have been sold, rather than lost or stolen? Has the USPS identified instances in which these keys have been sold by Postal carriers?
3. What steps have the USPS taken to improve management controls over universal keys, including, but not limited to, addressing the recommendations provided by the USPS OIG in report number 19-033-R20?
4. What plans does the USPS have to mitigate theft of mail out of the USPS Blue Collection boxes?”

Unfortunately, the potential loss or theft of collection box keys is not new, nor is the resulting possibility for mail theft. Depending on the delivery unit and route, a carrier’s keys could include not only the key that opens all local collection and relay boxes, but the keys for “cluster boxes” and apartment mail receptacles, as well as those to business customer mailrooms and other facilities the carrier would be authorized to access. How the USPS will respond to this growing security problem remains to be seen, but respond it must.

April Financials: Other Than PSRA Adjustment, Same Trends Continue

The Postal Service’s April financials were wildly skewed because of the impact of the *Postal Service Reform Act of 2022*, enacted early in the month, that erased tens of billions in health care costs. Other than that, revenue and volume figures were generally lower. Market-dominant mail volume fell compared to last April, but revenue was up thanks to higher prices. Meanwhile, competitive product volume ebbed again, continuing a downward trend. Transportation costs grew, but were offset by a favorable swing in the workers’ comp liability. Overall, the one-time PSRA adjustment resulted in “income” of \$60.263 billion in April, and \$58.134 billion for FY 2022 to date.

Volume and revenue

Total market-dominant mail volume for the month was down 1.4% from April 2021, led by a 6.0% decline in First-Class Mail, overcoming a 2.2% increase in Marketing Mail. Meanwhile, competitive products volume fell – again – down 8.5% for the month and 7.7% for the YTD. Total USPS volume was 10.449 billion pieces, down 1.9% from last April, while YTD volume, 77.089 billion pieces, was 1.0% lower.

- First-Class Mail: 3.939 bln pcs, **-6.0%**; 30.130 bln pcs, **-2.8%** YTD.
- Marketing Mail: 5.570 bln pcs, +2.2%; 40.233 bln pcs, +1.6% YTD.
- Periodicals: 319.9 mln pcs, **-0.9%**; 2.044 bln pcs, **-7.2%** YTD.
- Total Mkt Dom: 9.883 bln pcs, **-1.4%**; 72.865 bln pcs, **-0.6%** YTD.
- Total Competitive: 538.5 mln pcs, **-8.5%**; 3.995 bln pcs, **-7.7%** YTD.
- Total USPS: 10.449 bln pcs, **-1.9%**; 77.089 bln pcs, **-1.0%**.

As noted, market-dominant revenue was helped by last August’s price increase. Compared to SPLY, revenue from the market-dominant classes was up 3.0% for the month and 6.3% YTD, while revenue from the competitive products was

3.6% lower for April and down 3.2% for the YTD, all compared to SPLY. Total USPS revenue for the month (\$6.347 billion) was 0.8% lower than SPLY but up 1.4% for SPLY YTD:

- First-Class Mail: \$1.902 bln, **-0.2%**; \$14.636 bln, +3.2% YTD.
- Marketing Mail: \$1.312 bln, +7.9%; \$9.550 bln, +10.6% YTD.
- Periodicals: \$85.65 mln, +5.4%; \$568.3 mln, +1.4% YTD.
- Total Mkt Dominant: \$3.611 bln, +3.0%; \$27.047 bln, +6.3% YTD.
- Total Competitive: \$2.602 bln, **-3.6%**; \$19.286 bln, **-3.2%** YTD.
- Total USPS: \$6.347 bln, **-0.8%**; \$4.426 bln, +1.4% YTD.

Expenses and workhours

Total “controllable” compensation and benefit costs (\$2.494 billion) were skewed lower because of the one-time PSRA adjustment, as were total expenses for the month and YTD (-\$53.903 billion and -\$10,591, respectively).

Workhour usage was 1.5% over plan for the month though lower than SPLY, led by mail processing workhours that were 5.5% over plan and 4.8% higher than SPLY for the month. Total workhours YTD are 0.6% over plan but 0.9% below SPLY.

- Month’s end complement: 643,433 employees (506,639 career, 136,794 non-career) **+0.24%** compared to last April (641,922 employees: 502,520 career, 139,422 non-career), but **1.42% more career workers** than a year ago.

Compared to pre-pandemic April 2019, USPS volume is down 12.03% (market dominant volume 13.04% lower; competitive product volume up 21.21%). Meanwhile, despite the significant loss of mail volume, workhours are down only 0.42%. Those figures again repeat the worrisome trends of more employees and higher costs, but lower volume. *All the numbers are on the next page.*

USPS Preliminary Information (Unaudited) – April 2022 ¹

OPERATING DATA OVERVIEW ^{1,2}		Current Period					Year-to-Date				
Revenue/Volume/Workhours (Millions)		Actual	Plan	SPLY	% Plan Var	% SPLY Var	Actual	Plan	SPLY	% Plan Var	% SPLY Var
Revenue											
Operating Revenue		\$6,347	\$6,324	\$6,396	0.4%	-0.8%	\$47,426	\$46,549	\$46,782	1.9%	1.4%
Other Revenue		\$1	\$1	\$1	NMF	0.0%	\$28	\$7	\$18	NMF	55.6%
Total Revenue		\$6,348	\$6,325	\$6,397	0.4%	-0.8%	\$47,454	\$46,556	\$46,800	1.9%	1.4%
Operating Expenses											
Personnel Compensation and Benefits 🚧		\$-55,687	\$5,29	\$5,455	NMF	NMF	\$-23,266	\$38,288	\$35,498	-160.8%	-165.5%
Transportation		\$811	\$741	\$803	9.4%	1.0%	\$6,012	\$5,838	\$5,748	3.0%	4.6%
Supplies and Services		\$229	\$272	\$227	-15.8%	0.9%	\$1,876	\$1,993	\$1,781	-5.9%	5.3%
Other Expenses		\$732	\$628	\$585	16.6%	25.1%	\$4,698	\$4,372	\$4,145	7.5%	13.3%
Total Operating Expenses		\$-53,195	\$6,870	\$7,070	NMF	NMF	\$-10,680	\$50,491	\$47,172	-121.2%	-122.6%
Net Operating Income/Loss		\$60,263	-\$545	-\$673			\$58,134	-\$3,935	-\$372		
Interest Income		\$8	\$3	\$2	166.7%	NMF	\$28	\$18	\$16	55.6%	75.0%
Interest Expense		\$12	\$12	\$12	0.0%	0.0%	\$89	\$89	\$92	0.0%	-3.3%
Net Income/Loss		\$60,259	-\$554	-\$683			\$58,073	-\$4,006	-\$448		
Mail Volume											
Total Market Dominant Products ³		9,883	9,732	10,028	1.6%	-1.4%	72,865	70,209	73,301	3.8%	-0.6%
Total Competitive Products ³		539	520	588	3.7%	-8.3%	3,995	3,935	4,328	1.5%	-7.7%
Total International Products		27	30	33	-10.7%	-18.2%	229	239	269	-4.2%	-14.9%
Total Mail Volume		10,449	10,282	10,649	1.6%	-1.9%	77,089	74,383	77,898	3.6%	-1.0%
Total Workhours		97	96	98	1.0%	-1.0%	702	698	708	0.6%	-0.8%
Total Career Employees		506,639		502,520		0.8%					
Total Non-Career Employees		136,794		139,422		-1.9%					
MAIL VOLUME and REVENUE ^{1,2,4}		Current period				Year-to-Date					
Pieces and Dollars (Thousands)		Actual		SPLY	% SPLY Var	Actual		SPLY	% SPLY Var		
First Class (excl. all parcels and Int'l.)											
Volume		3,939,318		4,189,287	-6.0%	30,129,849		30,991,501	-2.8%		
Revenue		\$1,902,407		\$1,906,871	-0.2%	\$14,636,400		\$14,185,836	3.2%		
Periodicals											
Volume		319,921		322,781	-0.9%	2,043,608		2,202,093	-7.2%		
Revenue		\$85,649		\$81,280	5.4%	\$568,343		\$560,406	1.4%		
Marketing Mail (excl. all parcels and Int'l.)											
Volume		5,570,265		5,450,665	2.2%	40,233,498		39,601,527	1.6%		
Revenue		\$1,311,543		\$1,216,052	7.9%	\$9,549,870		\$8,637,491	10.6%		
Package Svcs. (ex. Inb'd. Intl Surf. PP @ UPU rates)											
Volume		33,150		41,410	-19.9%	295,409		319,735	-7.6%		
Revenue		\$63,855		\$66,659	-4.2%	\$516,601		\$506,184	2.1%		
All other Market Dominant Mail											
Volume		20,403		23,370	-12.7%	162,674		186,216	-12.6%		
Revenue		\$247,581		\$235,998	4.9%	\$1,775,300		\$1,560,588	13.8%		
Total Market Dominant Products (ex. all Int'l.)											
Volume		9,883,057		10,027,513	-1.4%	72,865,038		73,301,072	-0.6%		
Revenue		\$3,611,035		\$3,506,860	3.0%	\$27,046,514		\$25,450,505	6.3%		
Shipping and Package Services											
Volume		538,525		588,572	-8.5%	3,994,926		4,328,325	-7.7%		
Revenue		\$2,487,294		\$2,588,931	-3.9%	\$18,519,579		\$19,274,477	-3.9%		
All other Competitive Products											
Volume		-		-	0.0%	-		-	0.0%		
Revenue		\$114,718		\$109,038	5.2%	\$766,818		\$659,041	16.4%		
Total Competitive Products (ex. all Int'l.)											
Volume		538,525		588,572	-8.5%	3,994,926		4,328,325	-7.7%		
Revenue		\$2,602,012		\$2,697,969	-3.6%	\$19,286,397		\$19,993,518	-3.2%		
Total International ⁵											
Volume		27,345		33,006	-17.2%	228,545		268,480	-14.9%		
Revenue		\$133,872		\$191,526	-30.1%	\$1,092,706		\$1,397,605	-21.8%		
Total											
Volume ⁴		10,448,927		10,648,791	-1.9%	77,088,509		77,897,877	-1.0%		
Revenue		\$6,346,919		\$6,396,355	-0.8%	\$47,425,617		\$46,781,628	1.4%		
EXPENSES OVERVIEW ^{1,2}		Current Period					Year-to-Date				
Dollars (Millions)		Actual	Plan	SPLY	% Plan Var	% SPLY Var	Actual	Plan	SPLY	% Plan Var	% SPLY Var
Controllable Pers. Comp. & Benefits 🚧 ^{6,7}		\$2,494	\$4,874	\$4,90	-48.8%	-49.2%	\$33,573	\$35,804	\$35,152	-6.2%	-4.5%
RHB Unfunded Liabilities Amortization ⁸		-\$57,475	\$83	\$75	NMF	NMF	-\$56,975	\$583	\$525	NMF	NMF
FERS Unfunded Liabilities Amortization ⁸		\$117	\$117	\$112	0.0%	4.5%	\$817	\$817	\$784	0.0%	4.2%
CSRS Unfunded Liabilities Amortization ⁸		\$155	\$155	\$151	0.0%	2.6%	\$1,084	\$1,084	\$1,060	0.0%	2.3%
Workers' Compensation ⁹		-\$978	\$--	-\$207	NMF	NMF	-\$1,765	\$--	-\$2,023	NMF	-12.8%
Total Pers. Comp. & Benefits		-\$55,687	\$5,229	\$5,455	NMF	NMF	-\$23,266	\$38,288	\$35,498	-160.8%	-165.5%
Total Non-Personnel Expenses		\$1,772	\$1,641	\$1,615	8.9%	9.7%	\$12,586	\$12,203	\$11,674	3.1%	7.8%
Total Expenses (incl. interest)		-\$53,903	\$6,882	\$7,082	NMF	NMF	-\$10,591	\$50,580	\$47,264	-120.9%	-122.4%
WORKHOURS ^{1,2,3}		Current Period					Year-to-Date				
Workhours (Thousands)		Actual	Plan	SPLY	% Plan Var	% SPLY Var	Actual	Plan	SPLY	% Plan Var	% SPLY Var
City Delivery		35,515	34,845	35,631	1.9%	-0.3%	252,858	252,811	256,394	0.0%	-1.4%
Mail Processing		17,019	16,129	16,240	5.5%	4.8%	131,902	124,065	126,834	6.3%	4.0%
Customer Services & Retail		12,403	12,395	12,999	0.1%	-4.6%	90,177	91,379	94,609	-1.3%	-4.7%
Rural Delivery		18,907	18,355	18,654	3.0%	1.4%	131,929	130,053	131,323	1.4%	0.5%
Other		13,607	14,302	14,252	-4.9%	-4.5%	94,831	99,252	98,718	-4.5%	-3.9%
Total Workhours		97,451	96,026	97,776	1.5%	-0.3%	701,697	697,560	707,878	0.6%	-0.9%

¹ Includes one-time impact of the PSRA, which repealed the requirement that the USPS annually prepay future retiree health benefits and canceled all past due prefunding payments, resulting in a reversal of \$59.6 billion for health benefits that had been accrued but unpaid between October 2012 and March 2022. ²/April 2022 had the same number of delivery days and 0.75 less retail days compared to April 2021. YTD has the same number of delivery days and 0.75 more retail days compared to SPLY. ³/Numbers may not add due to rounding and/or adjustments. Percentages calculated using unrounded numbers. ⁴/Excludes all International. ⁵/The sampling portion of the RPW system is designed to be statistically valid on a quarterly and annual basis. ⁶/Includes Current Period Market Dominant Volume of 14,396 and Revenue of \$18,933; SPLY Market Dominant Volume of 12,373 (+16.4%) and Revenue of \$16,700 (+13.4%). Also includes Current Period Competitive Volume of 12,949 and Revenue of \$114,939; SPLY Competitive Volume of 20,633 (-37.2%) and Revenue of \$174,826 (-34.3%). ⁷/This amount includes cash outlays including administrative fees. ⁸/This represents the accrual for normal RHB costs for current employees, based on the beginning of the fiscal year estimates. ⁹/This represents the estimated OPM amortization expense related to the FERS and CSRS; the actual invoices will be received between June 2022 and October 2022. For PSRHB, this represents the estimated Retiree Health Benefits amortization expenses of the unfunded liabilities. The actual invoice will be received between June 2022 and October 2022. ¹⁰/This represents non-cash adjustments: the impact of discount and inflation rate changes and the actuarial revaluation of new and existing cases. NMF = Not Meaningful Figure, percentages +/- 200% or greater.

USPS INTERIM FINAL RULE: New Mailing Standards for the Separation of Hazardous Materials

POSTAL SERVICE

39 CFR Part 111

New Mailing Standards for the Separation of Hazardous Materials

AGENCY: Postal Service.

ACTION: Interim final rule.

SUMMARY: The Postal Service is revising Publication 52, *Hazardous, Restricted, and Perishable Mail* (Pub 52), to incorporate new requirements for mailers to separate, into identifiable containers, all hazardous material (HAZMAT) requiring hazardous marks or labels from other mail when tendering to the Postal Service. The Postal Service is also adopting related standard operating procedures for the Postal Service's acceptance, dispatch, and mail processing personnel to maintain the integrity of HAZMAT separation. Additionally, the Postal Service will now require pre-owned, damaged, or defective electronic devices containing or packed with lithium batteries to be mailed only via surface transportation and to bear specified markings.

DATES: *Effective date:* This rule is effective June 6, 2022. *Comments due date:* Comments must be received on or before July 6, 2022.

ADDRESSES: Mail or deliver written comments to the Manager, Product Classification, US Postal Service, 475 L'Enfant Plaza SW, Room 4446, Washington, DC 20260-3436. Email comments containing the name and address of the commenter may be sent to PCFederalRegister@usps.gov, with a subject line of "New Mailing Standards for the Separation of Hazardous Materials." Faxed comments are not accepted. All submitted comments and attachments are part of the public record and subject to disclosure. Do not enclose any material in your comments that you consider to be confidential or inappropriate for public disclosure. You may inspect and photocopy all written comments, by appointment only, at USPS Headquarters Library, 475 L'Enfant Plaza SW, 11th Floor North, Washington, DC 20260. These records are available for review Monday through Friday, 9 a.m. and 4 p.m. by calling 202-268-2906.

FOR FURTHER INFORMATION CONTACT: Dale Kennedy, (202) 268-6592, or Jennifer Anderson, (202) 268-2108.

SUPPLEMENTARY INFORMATION:

Background

The Postal Service hereby amends Publication 52, *Hazardous, Restricted, and Perishable Mail*, with the provisions set forth herein. While not codified in title 39, *Code of Federal Regulations* ("CFR"), Publication 52 is a regulation of the Postal Service, and changes to it may be published in the *Federal Register*. 39 CFR 211.2(a)(2). Moreover, Publication 52 is incorporated by reference into *Mailing Standards of the United States Postal Service*, Domestic Mail Manual ("DMM") section 601.8.1, which is incorporated by reference, in turn, into the *Code of Federal Regulations*. 39 CFR 111.1, 111.3. Publication 52 is publicly available, in a read-only format, via the Postal Explorer website at <https://pe.usps.com>. In addition, links to Postal Explorer are provided on the landing page of *USPS.com*, the Postal Service's primary customer-facing website, and on *Postal Pro*, an online informational source available to postal customers.

Misrouted and mishandled HAZMAT can and does cause fires, spills, corrosion, and other dangers to personnel and equipment of the Postal Service, air carriers, and surface transportation providers, as well as to mailers' property and to aircraft passengers.

In particular, the increasing consumer use of lithium metal and lithium-ion batteries has brought a concomitant rise in fires and other dangerous incidents related to such batteries. The Federal Aviation Administration (FAA) has publicly reported 365 aviation incidents involving lithium batteries between January 23, 2006, and May 1, 2022, including a substantial number in just the most recent twelve months. FAA, *Events with Smoke, Fire, Extreme Heat, or Explosion Involving Lithium Batteries*, May 1, 2022, <https://go.usa.gov/xusNT>.¹

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has similarly reported a number of incidents involving mail between 2014 and 2021. See PHMSA, *Incident Statistics*, last updated Mar. 9, 2022, <https://go.usa.gov/xlrSS>. One-third of the PHMSA-reported mail incidents occurred on passenger aircraft; approximately half were discovered because of a thermal or release event; and more than half were discovered only after flight. A plurality of such items were Class 9 items such as lithium batteries, and many were ineligible for air transportation. Moreover, in recent compliance inspections, PHMSA investigators "routinely saw shippers and carriers improperly package and ship lithium batteries for disposal or recycling," including "packaging lithium batteries in a way that did not prevent short circuits, mixing damaged lithium batteries with other batteries in the same packaging within shipments for disposal or recycling, and shipping pallet loads of batteries in boxes and drums with inappropriate identification of the packages' contents." PHMSA, *Safety Advisory Notice for the Disposal and Recycling of Lithium Batteries in Commercial Transportation 1–2*, May 17, 2022, <https://go.usa.gov/xJY3J>.

Internal Postal Inspection Service data and anecdotal reports from commercial air-carrier partners over the last few years likewise indicate a consistent and alarming rise in incidents involving mailed packages of both lithium batteries and other HAZMAT, including flammable liquids, aerosols, and strike-anywhere matches. Incidents include unlabeled or improperly labeled air-ineligible HAZMAT being accepted for air transportation, as well as properly prepared air-ineligible HAZMAT that was improperly routed to air transportation because it was commingled with other mail and insufficiently visible to Postal Service personnel.

The FAA and PHMSA have issued standards for safe carriage of lithium batteries, including a prohibition on air transportation of damaged, defective, or recalled lithium batteries. See, e.g., 49 CFR 173.185. However, the determinants of hazard risk, such as damage, defects, state of charge, or packaging of batteries, are not outwardly apparent to Postal Service and other personnel handling packages. In other respects as well, safety depends on a shipper's awareness of and compliance with packaging, labeling, marking, and other HAZMAT shipping requirements. If a shipper does not make HAZMAT adequately visible to Postal Service personnel responsible for acceptance and sortation, then there is an unacceptably high risk that postal and air-carrier personnel will not know that the item warrants special handling and routing.

While many incidents involving HAZMAT in the mail are minor and controllable, the risk of a major threat to an aircraft – including, in particular, passenger aircraft – and other infrastructure and personnel is real, severe, and growing with the rise in lithium-battery and other hazardous shipments. By way of illustration, the US Coast Guard (USCG) recently reported that on August 19, 2021, a shipping container loaded with discarded lithium batteries caught fire, with heat intense enough not only to destroy much of the cargo, but also to burn a hole in the container's structure itself. USCG, *Marine Safety Alert: Lithium Battery Fire*, Mar. 10, 2022, <https://go.usa.gov/xJYxu>. USCG noted that the incident would have been "catastrophic" if it had occurred after loading onto the container ship. The same could be said if a similar fire arose from discarded lithium batteries aboard passenger aircraft. It is imperative that the Postal Service undertake measures to reduce the risk to its operations and aviation safety.

On August 3, 2020, the Postal Service published a notice of proposed rulemaking regarding a proposed requirement to separate air-eligible HAZMAT from all other matter in a mailing. 85 FR 46575. The Postal Service received several comments on that notice, and it appreciates the valuable public input. In particular, multiple commenters expressed support for the proposition of separating HAZMAT from non-HAZMAT matter and for further improving the Postal Service's ability to ensure that air-ineligible HAZMAT is not inadvertently loaded onto air transportation. Further study and intervening events have made clear that the initial proposal would not be sufficiently effective to mitigate the risk that HAZMAT poses to other mail; postal and air-carrier

¹ The FAA notes that the publicly reported incidents do not represent all incidents reported to the FAA, let alone all such incidents at large.

USPS INTERIM FINAL RULE: New Mailing Standards for the Separation of Hazardous Materials

equipment and personnel; commercial air passengers; and the public at large. In lieu of the earlier proposal, therefore, the Postal Service is adopting the three measures described herein and solicits public comment on the new measures.

Summary of New Measures

In addition to preexisting packaging, labeling, and marking requirements and other conditions for mailability, two conditions are necessary to ensure the proper handling and routing of HAZMAT.

The first condition is *visibility*: the Postal Service must be aware of HAZMAT shipments in order to accord them appropriate attention. A HAZMAT package can easily evade postal HAZMAT processing if it is nestled beneath non-HAZMAT packages in a bulk mail receptacle. To address this problem, the Postal Service will require mailers tendering a mix of HAZMAT and non-HAZMAT items to present them separately, including in separate mail receptacles with the exception of mail entered at a Destination Delivery Unit (DDU), Destination Sectional Center Facility (DSCF) or Destination Network Distribution Center (DNDC). In contrast with the 2020 proposed rule, customers are required to separate *all* HAZMAT from non-HAZMAT, rather than only air-eligible HAZMAT, from other mail. While visibility is important for air-eligible HAZMAT to ensure proper handling, it is also important that surface-only HAZMAT not be erroneously routed to air transportation due to commingling with non-HAZMAT. Separating all HAZMAT from non-HAZMAT will reduce the likelihood of commingling and increase the opportunity for Postal Service personnel to determine the proper procedures for any HAZMAT items presented.

The second condition is *separation integrity*: once recognized, the Postal Service must ensure that HAZMAT is not commingled with non-HAZMAT, lest it be improperly handled or routed. Therefore, the Postal Service is directing personnel to keep HAZMAT items separate from non-HAZMAT items at all points in the mailstream.

This interim final rule also introduces specific labeling requirements for packages containing pre-owned, damaged, or defective electronic devices containing or packed with lithium batteries, and bars them from eligibility for any Postal Service product that makes routine use of air transportation. Among other things, mailings covered by the new requirements include used items sent pursuant to e-commerce or private sales transactions; lost items being returned to the owner; and items sent for repair, replacement, upgrade, warranty service, diagnostics, recycling, or insurance claims. For clarity, pre-owned electronic devices exclude those that are in new, unopened manufacturer packaging.

The Postal Service and its partner air carriers have identified pre-owned, damaged, and defective electronic devices containing lithium batteries as a particular and growing cause of lithium-battery incidents. Indeed, damaged, defective, and recalled lithium cells and batteries are already ineligible for air transportation. 49 CFR 173.185(f). Beyond devices with damage or defects to batteries themselves, such devices may also have other damage or defects that increase the chances of exposure and ignition of even an intact battery. Moreover, such devices are highly likely to be packaged without original packaging and have batteries in various conditions and varying states of charge. In contrast with new electronic devices in manufacturers' original packaging, consumers sending pre-owned, damaged, and defective electronic devices are less likely to be aware of HAZMAT requirements, let alone to comply with them.

As a result of these factors, lithium batteries in pre-owned, damaged, and defective electronic devices pose a particular hazard, as demonstrated by numerous incidents reported to the Postal Service as involving such items. To reduce the risk of such incidents occurring on air transportation, the Postal Service will restrict pre-owned, damaged, and defective electronic devices containing or packaged with lithium batteries to domestic products that use surface transportation. Consequently, such items will be prohibited in inbound and outbound international mail; mail to, from, and between overseas military and diplomatic addresses; and mail to, from, and within certain domestic locations for which the Postal Service lacks surface transportation. Moreover, to ensure adequate visibility, the Postal Service will require that packages containing pre-owned, damaged, and defective electronic devices containing or packaged with lithium batteries be marked "Restricted Electronic Device" and "Surface Transportation Only," in addition to any other applicable markings.

As explained in the next section, the Postal Service has decided to implement these requirements immediately, due to the urgency of the danger to personnel, property, passengers, and the public. Nevertheless, the Postal Service is providing the public with a 30-day period for submission of comments on these changes. Following the 30-day public comment period, the Postal Service will review and consider comments received and then publish a further final rule responding to those comments and making any changes to this interim final rule.

Administrative Procedure Act

The Administrative Procedure Act (APA) does not ordinarily apply to Postal Service rulemakings. 39 USC 410(a). As a rare exception to that general rule, "proceedings concerning the mailability of matter under this chapter and chapters 71 and 83 of title 18" are extraordinarily subject to the APA. 39 USC 3001(m). Because the measures herein merely concern acceptance requirements, available services, and conditions of mailing for mailable matter, and do not concern the mailability of matter itself, they do not trigger the narrow exception for APA applicability.

Even if this notice were deemed to be subject to the APA, good cause would exist, under 5 USC 553(b)(B), to issue the measures through this interim final rule without prior notice and a prior opportunity for public comment and, under 5 USC 553(d)(3), to dispense with the delayed effective date ordinarily prescribed by the APA. Pursuant to section 553(b)(B) of the APA, general notice and the opportunity for public comment are not required with respect to a rulemaking when an "agency for good cause finds (and incorporates the finding and a brief statement of reasons therefor in the rules issued) that notice and public procedure thereon are impracticable, unnecessary, or contrary to the public interest." The APA also requires a 30-day delayed effective date, except, as relevant here, "as ... provided by the agency for good cause found and published with the rule." 5 USC 553(d)(3).

The Postal Service finds that it would be impracticable and contrary to the public interest to delay issuance of this rule for the purpose of soliciting prior public comment because there is an immediate and pressing need to reduce the risks that HAZMAT poses to postal operations, supplier equipment and personnel, commercial air passengers, and the public. As described in the sections above, internal and public incident data and discussions with commercial air-carrier partners indicate an alarming rise in HAZMAT-related incidents in recent years. The rise in incidents concerns various forms of HAZMAT posing hazards to air transportation, including lithium batteries, flammable liquids and solids, and aerosols. As discussed in the preceding sections of this notice, pre-owned, damaged, and defective electronic devices containing or packaged with lithium batteries have been associated with a particular surge in fires and other incidents due to their compromised state, varying states of charge, lack of original packaging, and tender by consumers less likely to be aware of HAZMAT requirements than original equipment manufacturers and vendors. Any delay in implementation would intolerably increase the odds of a fire, explosion, or other catastrophic harm to personnel, property, passengers, and the public. Thus, delaying the implementation of the risk-mitigation measures in this interim final rule in order to receive and consider public comment would be impracticable and contrary to the public interest.² Immediate mitigation of these urgent safety risks also constitutes good cause for this interim rule to be effective immediately upon publication.

² See *Jifry v. FAA*, 370 F.3d 1174, 1179 (D.C. Cir. 2004) (upholding waiver of 5 U.S.C. 553(b)(B) based on Transportation Security Administration's determination that it was "necessary to prevent a possible imminent hazard to aircraft, persons, and property within the United States"); *Hawaii Helicopter Operators Ass'n v. FAA*, 51 F.3d 212, 214 (9th Cir. 1995) (same, where interim final rule was aimed at immediately mitigating "the threat to public safety reflected in an increasing number of helicopter accidents").

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USPS INTERIM FINAL RULE: New Mailing Standards for the Separation of Hazardous Materials

The Postal Service adopts the following changes to Publication 52, *Hazardous, Restricted, and Perishable Mail*, incorporated by reference into *Mailing Standards of the United States Postal Service, Domestic Mail Manual* (DMM), section 601.8.1, which is further incorporated by reference in the *Code of Federal Regulations*. 39 CFR 111.1, 111.3. Publication 52 is also a regulation of the Postal Service, changes to which may be published in the *Federal Register*. 39 CFR 211.2(a). Accordingly, for the reasons stated in the preamble, the Postal Service amends Publication 52 as follows:

Publication 52, Hazardous, Restricted and Perishable Mail

2 General Guidelines

[Revise the title of subchapter 25 to read as follows:]

25 Basic Guidelines for Postal Service Personnel

251 Guidelines for Acceptance Personnel

[Add new item c, renumber current item c as item d, revise item e (as renumbered), and add new items f and g to read as follows:]

- c. With the exception of mail entered at a Destination Delivery Unit (DDU), Destination Sectional Center Facility (DSCF), or Destination Network Distribution Center (DNDC) verify that all mailpieces containing mailable hazardous materials are presented separately from mailpieces not containing hazardous materials.
- d. Refuse (as permitted in POM 139) to accept any material that does not meet the applicable requirements for mailing and refer the circumstances to your local Postmaster or PCSC for a mailability ruling under 213 or 215, as appropriate.
- e. If a mailpiece containing a diagnostic (clinical) specimen is in a sack or tub, PS Tag 44 must be attached to ensure that the sack will be emptied at the processing point.
- f. With the exception of mail entered at a DDU, DSCF, or DNDC ensure mailpieces containing hazardous materials remain separated from other mailpieces and are placed into labeled containers further separated by transportation type. See 327.1a and 327.1b.
- g. See 253 for guidance regarding hazardous materials found in lobby drops or retail collection boxes.

252 Guidelines for Dispatch Personnel

[Insert new item b as follows, and renumber current item b as item c:]

- b. Ensure that all mailpieces with a hazardous-materials mark or label are separated from all other mail and are placed into labeled containers further separated by transportation type. See 327.1a and 327.1b.

[Revise item 5 in item c (as renumbered) to read as follows:]

5. If the mailpiece contains a material believed to be nonmailable, remove it from the mailstream and treat it in accordance with POM 139.117-.118, as appropriate.

[Add new section 253 to read as follows:]

253 Guidelines for Delivery and Collection Personnel

Delivery and collection personnel must follow these procedures when delivering and collecting mail:

- a. Conduct a thorough examination of all sides of the mailpiece for hazardous material labels and markings or any nonmailable hazardous characteristics (e.g., prohibited marks or labels). If the mailpiece is nonmailable, leaking or stained, do not collect it; notify the customer, if present; and contact your supervisor. Ensure that mailable hazardous materials are separate from all other mail upon loading on your vehicle and remains separated at all times.

3 Hazardous Materials

32 General

327 Transportation Requirements

327.1 General

[Revise item b to read as follows:]

- b. *Surface Transportation.* All mailable hazardous materials eligible to be sent as USPS Marketing Mail, USPS Retail Ground, Parcel Select, or Parcel Return Service must be prepared under the requirements that apply to surface transportation. A mailpiece containing mailable hazardous material with postage paid at USPS Marketing Mail, USPS Retail Ground, Parcel Select, or Package Return Service prices must not, under any circumstance, be transported on air transportation.

327.2 Air Transportation Prohibitions

[Add new item g as follows, and renumber current item g as item h:]

- g. Pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries (see 349.12e).

[Add new section 329 to read as follows:]

329 Presentation of Hazardous-Materials Mailings

With the exception of mail entered at a DDU, DSCF, or DNDC each mailer of mailable hazardous materials requiring a label or marking must:

- a. Present such mailpieces separately from any mailpieces not containing hazardous materials. Where mailpieces are tendered in containers, pallets, or other mail transport equipment (see Handbook PO-502, *Mail Transport Equipment*), hazardous-materials mailpieces must be presented in a separate receptacle from non-hazardous-materials mailpieces.
- b. Clearly mark an exterior side of all receptacles containing hazardous materials mailpieces as "HAZMAT".

34 Mailability by Hazard Class

349 Miscellaneous Hazardous Materials (Hazard Class 9)

349.1 Definition

349.12 Lithium Battery – Definitions

[Add new item e as follows:]

- e. *Pre-owned, damaged, or defective electronic device* means an electronic device containing or packaged with one or more lithium cells or batteries and where the electronic device (1) is not new and contained in new, unopened packaging and/or (2) that has some form of damage or defect.

349.2 Mailability

349.21 Nonmailable Class 9 Materials

[Add new item g and h to read as follows:]

g. Damaged, defective, or recalled batteries unless approved by the director, Product Classification (see 214 for address).

h. All pre-owned, damaged, or defective electronic devices in international mail or domestic air transportation.

Exhibit 349.222 Domestic Lithium Battery Mailability

[Add new footnote 1 reference to Air Transportation column, create new footnote text, and renumber existing references previously numbered as 1 through 7 to 2 through 8]

	Surface Transportation	Air Transportation ¹	Mailpiece Limitations ²
Lithium Metal or Lithium Alloy Batteries ^{3,4} <i>Small, non-rechargeable, consumer-type batteries</i>			
Contained in (properly installed in equipment)	Mailable	Mailable	8 cells or 2 batteries 11 lbs.
Packed with equipment, but not installed in the equipment	Mailable	Mailable	8 cells or 2 batteries
Without the equipment they operate (individual batteries in originally sealed packaging)	Mailable	Prohibited	5 lbs.
Lithium-ion or Lithium Polymer Batteries ^{5,6} <i>Small, rechargeable, consumer-type batteries</i>			
Packed with equipment, but not installed in the equipment	Mailable	Mailable	8 cells or 2 batteries 11 lbs.
Contained in (properly installed in equipment)	Mailable	Mailable	8 cells or 2 batteries
Without the equipment they operate (individual batteries in originally sealed packaging)	Mailable	Prohibited	5 lbs.
Without the equipment they operate (individual batteries in originally sealed packaging) (Intra-Alaska only)	*	Mailable	8 cells or 2 batteries
Very Small Lithium Metal or Lithium-ion Batteries ^{7,8} <i>Exception for very small consumer-type batteries in USPS air transportation</i>			
Contained in (properly installed in equipment)	Mailable	Mailable	No limit on cells/batteries 5.5 lbs
Packed with equipment, but not installed in the equipment	Mailable	Mailable	No limit on cells/batteries 5.5 lbs
Damaged, Defective, or Recalled Batteries	Prohibited, unless approved by the manager, Product Classification.		

¹ *Pre-owned, damaged, or defective electronic devices are prohibited from Air Transportation.*

² *When a mailpiece limitation of 8 cells or 2 batteries is applicable, a mailpiece may contain either 8 cells or 2 batteries, not both.*

³ *Each cell must not contain more than 1g lithium content.*

⁴ *Each battery must not contain more than 2g aggregate lithium content.*

⁵ *Each cell must not exceed more than 20 Wh (watt-hour rating).*

⁶ *Each battery must not exceed 100 Wh.*

⁷ *Each lithium metal or lithium alloy cell or battery must not exceed 0.3 gram of lithium content.*

⁸ *Each lithium-ion or lithium polymer cell or battery must not exceed 2.7 Wh.*

6 International Mail

62 Hazardous Materials: International Mail

622 Mailable Hazardous Materials

622.5 Lithium and Lithium-ion Cells and Batteries – General

[Revise the first paragraph to read as follows:]

Only lithium batteries under 622.51 and 622.52 that are properly installed in the equipment they operate may be sent internationally or to and from an APO, FPO, or DPO location (subject to the conditions prescribed by the Department of Defense listed in *Overseas Military/Diplomatic Mail* in the *Postal Bulletin*). Damaged, defective, or recalled lithium batteries and pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries are prohibited and may not be mailed internationally or to and from APO, FPO, or DPO locations under any circumstances. See 349.21.

Exhibit 622.5 International Lithium Battery Mailability

[Add new footnote 2 to International APO/FPO/DPO column, create new 2 footnote text, and renumber existing references previously numbered as 2 through 8 to 3 through 9]

	International APO/FPO/DPO ^{1,2}	Mailpiece Battery Limit ³
Lithium Metal or Lithium Alloy Batteries ^{4,5} <i>Small, non-rechargeable, consumer-type batteries</i>		
Contained in (properly installed in equipment)	Mailable	Maximum of 4 cells or 2 batteries
Packed with equipment, but not installed in the equipment	Prohibited	
Without the equipment they operate (individual batteries in originally sealed packaging)	Prohibited	
Lithium-ion or Lithium Polymer Batteries ^{6,7} <i>Small, rechargeable, consumer-type batteries</i>		
Contained in (properly installed in equipment)	Mailable	Maximum of 4 cells or 2 batteries
Packed with equipment, but not installed in the equipment	Prohibited	
Without the equipment they operate (individual batteries in originally sealed packaging)	Prohibited	
Very Small Lithium Metal or Lithium-ion Batteries ^{8,9} <i>Exception for very small consumer-type batteries in international transportation</i>		
Contained in (properly installed in equipment)	Mailable	Maximum of 4 cells or 2 batteries
Packed with equipment, but not installed in the equipment	Prohibited	
Without the equipment they operate (individual batteries in originally sealed packaging)	Prohibited	

USPS INTERIM FINAL RULE: New Mailing Standards for the Separation of Hazardous Materials

- ¹ Unless otherwise prohibited by the international destination country or specific APO/FPO/DPO ZIP Code location.
- ² Damaged, defective, or recalled lithium batteries and pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries are prohibited and may not be mailed internationally or to and from APO, FPO, or DPO locations under any circumstances.
- ³ When a mailpiece limitation of 4 cells or 2 batteries is applicable, a mailpiece may contain either 4 cells or 2 batteries, not both.
- ⁴ Each lithium metal or lithium alloy cell must not contain more than 1g lithium content.
- ⁵ Each lithium metal or lithium alloy battery must not contain more than 2g of aggregate lithium content.
- ⁶ Each lithium-ion or lithium polymer cell must not exceed more than 20 Wh (watt-hour rating).
- ⁷ Each lithium-ion or lithium polymer battery must not exceed 100 Wh.
- ⁸ Each lithium metal or lithium alloy cell or battery must not exceed 0.3 gram of lithium content.
- ⁹ Each lithium-ion or lithium polymer cell or battery must not exceed a watt-hour rating of 2.7 Wh.

* * * * *

623 Nonmailable Hazardous Materials

[Add new items m and n as follows:]

- m. All damaged, defective, or recalled lithium batteries (see 349.21).
- n. All pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries (see 349.21).

* * * * *

Appendix C

* * * * *

USPS Packaging Instruction 9D

Lithium Metal and Lithium-Ion Cells and Batteries — Domestic

[Revise the first paragraph to read as follows:]

Except pursuant to 349.21, lithium metal (non-rechargeable) cells and batteries and lithium-ion (rechargeable) cells and batteries are mailable in limited quantities domestically via air or surface transportation when they are installed in or packed with the equipment they are intended to operate. Unless otherwise excepted, lithium metal and lithium-ion batteries (without equipment) are mailable in limited quantities domestically via surface transportation only. Lithium metal and lithium-ion batteries installed in or packed with pre-owned, damaged, or defective electronic devices meeting all mailability requirements in 349 are mailable via surface transportation only.

* * * * *

Mailability

[Revise the first bullet as follows:]

Lithium metal and lithium-ion cells and batteries *installed in or packed with* equipment (except for pre-owned, damaged, or defective electronic devices) are mailable via air or surface transportation.

* * * * *

[Add new fourth bullet to read as follows:]

Pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries (see 349.12e) must be mailed via domestic surface transportation only, provided they meet eligibility requirements in accordance with 349.

* * * * *

Markings

[Revise the first main bullet to read as follows:]

Lithium metal batteries properly *installed in* the equipment they are intended to operate (including pre-owned, damaged, or defective electronic devices):

* * * * *

[Revise the second main bullet to read as follows:]

Lithium metal batteries *packed with* the equipment they are intended to operate (including pre-owned, damaged, or defective electronic devices):

* * * * *

[Revise the fourth main bullet to read as follows:]

Lithium-ion batteries properly *installed in* the equipment they are intended to operate (including pre-owned, damaged, or defective electronic devices):

* * * * *

[Revise the fifth main bullet to read as follows:]

Lithium-ion batteries *packed with* the equipment they are intended to operate (including pre-owned, damaged, or defective electronic devices):

* * * * *

[Add new bullet at end of section to read as follows:]

Pre-owned, damaged, or defective electronic devices: In addition to any other applicable marking requirements listed above, packages containing pre-owned, damaged, or defective electronic devices containing or packaged with lithium batteries must be marked with the text “Restricted Electronic Device” and “Surface Transportation Only” on the address side of the package. See 221.1 and 325.1.

* * * * *

USPS Packaging Instruction 9E

Lithium Metal and Lithium-ion Cells and Batteries — International and APO/FPO/DPO

* * * * *

Mailability

[Add third and fourth bullets to read as follows:]

Pre-owned, damaged, and defective electronic devices containing or packaged with lithium batteries are prohibited (see 623). Lithium batteries that are *packed with* equipment, lithium batteries *sent separately* from equipment, or lithium batteries installed in equipment they intend to operate that are damaged, defective, or recalled batteries are prohibited (see 623).

* * * * *

Miscellany

More copies

Publishers of local newspapers soon will be able to use more free distribution of sample copies to win new subscribers. The Postal Service will be amending DMM 207.7 to reflect a change to the underlying statute (39 USC 3626(h)) included in the Postal Reform Act of 2022, enacted April 6.

Section 204 of the Act raised the annual limit on the number of copies that a Periodicals publisher can send to non-subscribers at In-County rates from 10% (of the number sent to subscribers at In-County rates) to 50%.

However, left unchanged was the existing 10% cap on non-subscriber copies sent at Outside-County rates and on non-subscriber copies sent at Preferred Outside-County rates.

Local “hometown” newspapers typically have the circulation pattern that enables them to qualify for In-County rates, but have a limited subscriber base to support their costs. In addition, they face the same challenges – electronic media, reticent advertisers, shortages of paper, difficulty finding and retaining employees, and slow postal delivery – that beset other Periodicals as well.

Battle stations

In a June 1 letter to the American Postal Workers Union, the Postal Service stated that

“... Headquarters Post Office Strategy and Optimization plans to conduct an evaluation to analyze and modify, if needed, the funding methodology for mail separation and cross-dock transfers in sectional center facilities (SCF) and Hub operations. Observations will be conducted to evaluate and align the current time factors in the Variance Program regarding the amount of time spent sorting mail into separate containers, known as ‘hashing,’ and preparing containers for cross-dock transfers at SCF and Hub operations. ...”

The observations would take place at thirty locations from mid-June through August.

The notice set off alarms at the APWU, whose clerk division director fired a letter back to the USPS asking for a meeting to address a litany of questions about the reasons for the observations and a range of contractual issues. “Any observation/evaluation where the employees are not performing ALL of the required duties would be a **flawed observation**,” the union warned. As PMG Louis DeJoy presses ahead with his network changes, this foretells the cooperation he should expect from the APWU.

Dog dangers

Any delivery worker quickly learns about dogs – the good ones and, most importantly, the bad ones.

Every year, based on the experience of its carriers, the Postal Service lists the worst places for dog bites the previous fiscal year, as part of its Dog Bite Awareness Week (June 5-11 this year). The 2021 “winners” were led by Cleveland, surpassing often #1 Houston, but it’s doubtful that the city, or any other on the list, will include its dog bite ranking in its visitor brochure.

Calendar Year 2021			
Office City	State	CY 2021	Rank
Cleveland	OH	58	1
Houston	TX	54	2
Kansas City	MO	48	3
Los Angeles	CA	44	4
Louisville	KY	42	5
Dallas	TX	38	6
St. Louis	MO	36	7
Chicago	IL	35	8
Detroit	MI	34	9
Philadelphia	PA	32	10
Columbus	OH	31	
San Diego	CA	31	11
San Antonio	TX	30	12
Denver	CO	29	13
Phoenix	AZ	28	14
Toledo	OH	27	15
Fort Worth	TX	26	16
Cincinnati	OH	25	17
Seattle	WA	24	18
Minneapolis	MN	22	19
Pittsburgh	PA	21	20
Akron	OH	20	21
Albuquerque	NM	20	
Dayton	OH	18	22
Miami	FL	18	
Baltimore	MD	17	23
Memphis	TN	17	
Youngstown	OH	16	24
Baton Rouge	LA	15	
Flint	MI	15	25
Flushing	NY	15	
Indianapolis	IN	15	

All the Official Stuff

Federal Register

Postal Service

NOTICES

June 2: Product Change [2]: Priority Mail Express Negotiated Service Agreement, 33517; Priority Mail Negotiated Service Agreement, 33518.

PROPOSED RULES

[None].

FINAL RULES

May 27: Nonsubscriber Cap for In-County Periodicals; 32086-32088.

June 1: Special Handling – Fragile Discontinued, 33047-33049.

June 6: New Mailing Standards for the Separation of Hazardous Materials, 34197-34203.

Postal Regulatory Commission

NOTICES

June 1: New Postal Products, 33218; Inbound Parcel Post (at UPU Rates), 33218-33219.

June 2: New Postal Products, 33517.

June 6: New Postal Products, 34320.

PROPOSED RULES

[None].

FINAL RULES

[None].

DMM Advisory

May 23: Monthly Labeling List Changes.

June 1: International Service Resumption Notice – Effective June 3, 2022.

June 3: New Mailing Standards for the Separation of Hazardous Materials.

Postal Bulletin (PB 22599, June 2)

- Effective **July 10**, DMM 215, 505, 507, 508, and 705 are revised to replace standards for the Centralized Account Processing System (CAPS) with those of the Enterprise Payment System (EPS). The Postal Service retired CAPS on April 1, 2022. Effective May 1, 2022, customers must contact the Mailing and Shipping Solutions Center (MSSC) help desk to retrieve legacy reporting if they want CAPS reporting data. CAPS legacy data will be available until April 30, 2023. After that date no methods to obtain the data will be available.
- Effective **June 2**, IMM Exhibits 292.532 and 293.532 are revised to reflect a change in the drop shipment location for International Priority Airmail (IPA) and International Surface Air Lift (ISAL) mailings from the Los Angeles International Service Center in Los Angeles (CA) to the Los Angeles (CA) International Service Center in Carson (CA). This change is based on the closure of the facility in Los Angeles effective April 27, 2022.

USPS Industry Alerts

May 26, 2022

National Zone Chart Matrix Updates Effective July 10, 2022

The Postal Service will be updating the method for calculating distance for Zone assignments, effective **July 10, 2022**. The National Zone Chart Matrix product distributed to customers on June 1, 2022, would typically have a July 1, 2022, effective date. However, due to the change identified above, the June 1, 2022, distributed file will only be effective for mail inducted July 10, 2022, or after. Once this file is effective, previous Zone Chart files will **not** be authorized. The normal schedule of the National Zone Charts Matrix product use will then resume on **August 1, 2022**. There are no structural changes to any file formats for users that subscribe to the National Zone Charts Matrix data. Should you have any questions, please send an email to inbox.labelist.ncsc@usps.gov for a reply.

May 31, 2022

Mail Spoken Here – May 2022 Edition – IE&O Newsletter

Please enjoy the attached latest edition of Mail Spoken Here. Our USPS Industry Engagement & Outreach newsletter contains informative and important articles on the following topics: PMG Delivers NPF Keynote - Address Focuses on Strategic Vision; New Vice Presidents - Gambhir, Raines Appointed to Posts; Board of Governors - Senate Confirms Two Nominees; Frame by Frame - Social Media Feature Touts COVID-19 Test Deliveries; Introducing our May 2022 PCC Spotlight; A Sorter Made to Order - Engineers Rise to Challenge at New CA Site; New Stamps - Release Date, Location Updates: Bold Strokes - Women's Rowing Stamps Dedicated in Philly, A Spirit as Big as the Sea - Eugenie Clark Stamp Dedicated in FL; Are you Interested in Joining MTAC? You Should be!; Upcoming Events; And now, a Quick Glance Forward; *Federal Register* Notices; The Latest *Postal Bulletins*; Thank you very much, from the USPS Mail Spoken Here team and IE&O. We hope you had a wonderful NPF in Phoenix!

June 1, 2022

INTERNATIONAL SERVICE RESUMPTION NOTICE – Effective June 3, 2022

[See the June 1 listing in the Special Section.]

June 3, 2022

Business Customer Gateway eDoc Training Series – Postal Wizard and Intelligent Mail for Small Business Tool [Corrected]

The Postal Service will host Bi-weekly Webinars on utilizing the Business Customer Gateway (BCG) for electronic documentation (eDoc) and postage statement submission. The topics will alternate between using the Postal Wizard (PW) and Intelligent Mail for Small Business Tool (IMsb Tool) applications. Learn how to eliminate hard copy postage statements and submit Full-Service mail! Join us for the next session on IMsb on Tuesday, June 7, 2022, at 1:00 PM EST.

- Meeting URL: <https://usps.zoomgov.com/j/1615857192?pwd=dGVJTjYNEFib2FGNmpJL2luZ2ZlZz09>; Meeting ID: 161 585 7192; Password: 903345. If requested, enter your name and email address. Enter meeting password: 903345
- Join Audio by the options below: Dial: 1-855-860-4313, 1-678-317-3330 or 1-952-229-5070 & follow prompts.

June 3, 2022

New Mailing Standards for the Separation of Hazardous Materials

The Postal Service has issued an interim final rule that will become effective upon publication in the Federal Register on June 6, 2022, with new requirements for the separation of hazardous materials (HAZMAT). In addition, the interim final rule restricts the mail class that may be utilized when shipping pre-owned, damaged or defective electronic devices containing or packaged with lithium batteries (such as cell phones, tablets, laptops, cameras, power tools, etc.) to USPS Retail Ground, Parcel Select, Parcel Return Service or Ground Return Service, and requires new marking requirements for these mailings. These immediate changes are necessary to address a rise in incidents involving lithium batteries and other HAZMAT. Although these requirements are effective June 6, 2022, the interim final rule provides a 30-day period for public comment, and a further final rule will be published that considers any comments. This interim final rule can be reviewed here. Please direct any inquiries or concerns to Product Classification via email at ProductClassification@usps.gov.

Calendar

[To register for any webinar, go to MailersHubWebinars.com](https://mailershub.com/webinars)

June 12-16 – In-Plant Printing & Mailing Ass'n Conf., Buffalo (NY)

June 21 – [Mailers Hub Webinar](#)

July 12-13 – Delivery Technology Advocacy Council mtg., Sussex (WI)

July 19 – Atlantic Area AIM Meeting

July 19 – [Mailers Hub Webinar](#)

July 26-27 – MTAC Meeting, USPS Headquarters

August 4-6 – MFSA Conference, Dallas (TX)

August 16 – [Mailers Hub Webinar](#)

August 16 – Southern Area AIM Meeting

August 24 – Central Area AIM Meeting

October 20 – Atlantic Area AIM Meeting

October 25-26 – MTAC Meeting, USPS Headquarters

BRANN & ISAACSON
ATTORNEYS AND COUNSELORS AT LAW

The services of Brann & Isaacson are now available to provide legal advice to subscribers. The firm is the Mailers Hub recommended legal counsel for mail producers on legal issues, including tax, privacy, consumer protection, intellectual property, vendor contracts, and employment matters. As part of their

subscription, Mailers Hub subscribers get an annual consultation (up to one hour) from Brann & Isaacson, and a reduced rate for additional legal assistance. The points of contact at Brann & Isaacson are: Martin I. Eisenstein; David Swetnam-Burland; Stacy O. Stitham, ststitham@brannlaw.com; Jamie Szal, jszal@brannlaw.com. They can also be reached by phone at (207) 786-3566.

Special Section: DMM Advisories and USPS Industry Alerts Related to COVID-19

These service disruptions affect Priority Mail Express International (PMEI), Priority Mail International (PMI), First-Class Mail International (FCMI), First-Class Package International Service (FCPIS), International Priority Airmail (IPA), International Surface Air Lift (ISAL), and M-Bag items. Unless otherwise noted, service suspensions to a particular country do not affect delivery of military and diplomatic mail.

June 1, 2022, DMM Advisory: International Service Resumption Notice – effective June 3, 2022

[Also issued as June 1, 2022, Industry Alert: COVID-19 CONTINUITY OF OPERATIONS UPDATE – International Service Resumption Notice]

Effective Friday, June 3, 2022, the Postal Service will resume acceptance of the following services destined to **Australia**: Priority Mail International (PMI); Airmail M-bags; International Priority Airmail (IPA) M-bags; International Surface Air Lift (ISAL) M-bags.

Additionally, the Postal Service will resume acceptance of the following services destined to **China**: Priority Mail International (PMI); First-Class Package International Service (FCPIS); International Priority Airmail (IPA) packets; International Surface Air Lift (ISAL) packets.

The Postal Service is closely monitoring service impacts related to the COVID-19 pandemic and will continue to update customers until the situation returns to normal. Please visit our International Service Alerts page for the most up to date information:

https://about.usps.com/newsroom/service-alerts/international/?utm_source=residential&utm_medium=link&utm_campaign=res_to_intl.

Thanks to Our Supporting Partners

Thanks to Our Partner Associations and Printing Industry Affiliates

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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

FIRST-CLASS MAIL																	
SINGLE-PIECE (\$)																	
Weight not over (oz.)	Letters ^{1, 2}						Flats ²	Keys & ID Devices									
	Machinable Stamped	Machinable Metered	Residual Machinable ³	Non-mach. Stamped	Non-mach. Metered	QBRM											
1	0.60	0.57	0.60	0.99	0.96	0.578	1.200	3.95									
2	0.84	0.81	0.60	1.23	1.20	0.578	1.440	4.19									
3	1.08	1.05	0.60	1.47	1.44	0.578	1.680	4.43									
3.5	1.32	1.29	0.60	1.71	1.68	0.578	1.920	4.67									
4							1.920	4.67									
5							2.160	4.91									
6							2.400	5.15									
7							2.640	5.39									
8							2.880	5.63									
9							3.120	5.87									
10							3.360	6.11									
11							3.600	6.35									
12							3.840	6.59									
13							4.080	6.83									
14							<1 lb or <2 lbs. applicable Priority Mail Retail Zone 4 rate + \$ 0.92										
15																	
< 16																	
¹ The price for single-piece, one, two, or three ounce letters also applies to sales of Forever stamps and Forever Print-on-Demand indicia at the time of purchase, as specified by the Postal Service. The price for a Forever additional ounce stamp is the difference between the 2-ounce price and the 1-ounce price.																	
² A handling charge of \$0.01 per piece applies to foreign-origin, inbound direct entry mail tendered by foreign postal operators, subject to the terms of an authorization arrangement.																	
³ This price applies only to residual machinable letters derived from a mixed weight presort mailing, and only when the residual mailing reflects the weight levels included in the mixed weight presort mailing. In all other cases, single-piece machinable metered letter rates apply.																	
Postcards ⁴																	
Each	\$ 0.440		QBRM, ea.		\$ 0.418		Double cards, each	\$ 0.880									
⁴ The price for single-piece postcards also applies to sales of stamped cards marked with Forever postage, at the time the stamped cards are purchased. The price also applies to Forever postcard stamps. A handling charge of \$0.01 per piece applies to foreign-origin, inbound direct entry mail tendered by foreign postal operators, subject to the terms of an authorization arrangement. Such inbound direct entry mail cannot include single-piece Double Cards.																	
Share Mail Letters and Postcards ⁵ (maximum weight 1 ounce)																	
Share Mail letters, each		\$ 0.630				Share Mail postcards, each		\$ 0.450									
⁵ To qualify for Share Mail, customers must meet and comply with all eligibility requirements of the program. Share Mail allows a qualifying customer to distribute pre-approved mailpieces that contain an Intelligent Mail barcode (IMb) and that can be mailed without prepayment of postage. Postage is collected when a pre-approved mailpiece is placed in the mailstream and scanned during processing. Customers that are party to a current Alternate Postage Marketing Agreement (Marketing Agreement) as of December 31, 2016, may continue to distribute Alternate Postage mailpieces for the duration of that agreement, per its terms. For all Marketing Agreements, the term “prevailing Alternate Postage rate” shall be synonymous with the prevailing Share Mail rate most recently approved by the Postal Regulatory Commission.																	
PRESORTED (\$)																	
Annual presort mailing fee – \$ 275.00																	
Weight not over (oz.)	Letters								Flats								
	Automation *			Presorted Machinable		Nonmachinable			Machin- able Residual ⁶	Automation *				Non- auto- motion			
	5-Digit	AADC	Mixed AADC	AADC	Mixed AADC	5-Digit	3-Digit	Mixed ADC		5-Digit	3-Digit	ADC	Mixed ADC				
1	0.455	0.491	0.515	0.493	0.526	0.562	0.671	0.794	0.60	0.555	0.762	0.821	0.934	1.080			
2	0.455	0.491	0.515	0.493	0.526	0.562	0.671	0.794	0.60	0.795	1.002	1.061	1.174	1.320			
3	0.455	0.491	0.515	0.493	0.526	0.562	0.671	0.794	0.60	1.035	1.242	1.301	1.414	1.560			
3.5	0.455	0.491	0.515	0.493	0.526	0.562	0.671	0.794	0.60	1.275	1.482	1.541	1.654	1.800			
4									1.275	1.482	1.541	1.654	1.800				
5									1.515	1.722	1.781	1.894	2.040				
6									1.755	1.962	2.021	2.134	2.280				
7									1.995	2.202	2.261	2.374	2.520				
8									2.235	2.442	2.501	2.614	2.760				
9									2.475	2.682	2.741	2.854	3.000				
10									2.715	2.922	2.981	3.094	3.240				
11									2.955	3.162	3.221	3.334	3.480				
12									3.195	3.402	3.461	3.574	3.720				
13									3.435	3.642	3.701	3.814	3.960				
⁶ This price applies only to residual machinable letters derived from a mixed weight presort mailing, and only when the residual mailing reflects the weight levels included in the mixed weight presort mailing. In all other cases, single-piece machinable metered letter rates apply.																	
Postcards *																	
Each									\$ 0.330	\$ 0.348	\$ 0.359		\$ 0.372				
* Discount, for each automation postcard, letter, or flat that meets the standards for the full-service Intelligent Mail option, per piece, \$0.003. Pieces eligible for Seamless Acceptance and prepared under the Full-Service Intelligent Mail option, discount per piece – \$0.001.																	
Move update assessment charge, pieces exceeding tolerance, per piece – \$0.08.																	
Picture Permit Indicia, per piece – \$0.01.																	
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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

USPS MARKETING MAIL

Annual fee – \$275.00
Customized MarketMail, per piece – \$0.536 (Commercial), \$0.396 (Nonprofit)
Picture Permit Imprint Indicia, per piece – \$0.021; Plus One card mailed with a Saturation letter marriage mail “host” mailpiece, each – \$0.100
Pieces eligible for Seamless Acceptance and prepared under the Full-Service Intelligent Mail option, discount per piece – \$0.001
Auto letters or auto, HD, or CR flats that meet the standards for the Intelligent Mail Full-Service option, discount per piece – \$0.003
Move update: Assessment charge, per piece – \$0.08; Noncompliance charge, per piece – \$0.07

Commercial Rates (\$)

DESTINATION ENTRY RATES			
None	NDC	SCF	DDU

Nonprofit Rates (\$)

DESTINATION ENTRY RATES			
None	NDC	SCF	DDU

LETTERS

CARRIER ROUTE

Pieces weighing 3.5 oz. (0.21875 lb.) or less

Basic	0.400	0.377	0.370	Basic	0.283	0.260	0.253
High Density	0.270	0.247	0.240	High Density	0.153	0.130	0.123
High Density Plus	0.225	0.202	0.195	High Density Plus	0.135	0.112	0.105
Saturation	0.209	0.186	0.179	Saturation	0.128	0.105	0.098

Nonautomation Saturation, High Density Plus, and High Density letters weighing 4.0 ounces or less, and carrier route letters weighing more than 3.5 oz. but not more than 4.0 ounces, must pay the applicable piece prices for Saturation (other prices, not EDDM prices), High Density Plus, High Density, and carrier route flats weighing 4.0 oz. or less. These pieces cannot be entered at a DDU and must be prepared as letters.

AUTOMATION

Pieces weighing 3.5 oz. (0.21875 lb.) or less

Mixed AADC	0.349	0.326		Mixed AADC	0.207	0.184	
AADC	0.328	0.305	0.298	AADC	0.186	0.163	0.156
5-Digit	0.296	0.273	0.266	5-Digit	0.154	0.131	0.124

NONAUTOMATION MACHINABLE

Pieces weighing 3.5 oz. (0.21875 lb.) or less

Mixed AADC	0.355	0.332		Mixed AADC	0.213	0.190	
AADC	0.339	0.316	0.309	AADC	0.197	0.174	0.167

Nonautomation nonmachinable letters weighing 4.0 ounces or less must pay the prices shown for Nonautomation flats. These pieces cannot be entered at a DDU and must be prepared as letters.

FLATS

Pieces weighing 4.0 oz. (0.25 lb.) or less

CARRIER ROUTE

(including nonautomation Saturation, High Density Plus, and High Density letters weighing 4 oz. (0.25 lb.) or less; and carrier route letters weighing more than 3.5 oz. (0.21875 lb.) but not more than 4 oz. (0.25 lb.); these pieces cannot be entered at a DDU and must be prepared as letters.)

Basic (other pallet)	0.390	0.334	0.323	0.321	Basic (other pallet)	0.299	0.243	0.232	0.230
Basic (5-digit pallet)	0.368	0.312	0.301	0.299	Basic (5-digit pallet)	0.277	0.221	0.210	0.208
High Density (other pallet) #	0.320	0.274	0.259	0.240	High Density (other pallet) #	0.229	0.183	0.168	0.149
High Density (5-d pallet) #	0.308	0.262	0.247	0.228	High Density (5-d pallet) #	0.217	0.171	0.156	0.137
High Density Plus (other plt) #	0.275	0.229	0.214	0.195	High Density Plus (other plt) #	0.181	0.135	0.120	0.101
High Density Plus (5-d plt) #	0.265	0.219	0.204	0.185	High Density Plus (5-d plt) #	0.171	0.125	0.110	0.091
Saturation (other pallet) #	0.261	0.215	0.200	0.181	Saturation (other pallet) #	0.169	0.123	0.108	0.089
Saturation (5-digit pallet)#	0.254	0.208	0.193	0.174	Saturation (5-digit pallet)#	0.162	0.116	0.101	0.082
Saturation EDDM (other plt)#	0.262	0.216	0.201	0.182	Saturation EDDM (other plt)#	0.170	0.124	0.109	0.090
Saturation EDDM (5-d pallet)#	0.255	0.209	0.194	0.175	Saturation EDDM (5-d pallet)#	0.163	0.117	0.102	0.083
Sat EDDM Retail				0.187	Sat EDDM Retail				

- Surcharge – detached address labels, each – \$0.065 (w/o ads); \$0.080 (w/ads) # - Surcharge – detached address labels, each – \$0.065 (w/o ads); \$0.080 (w/ads)

AUTOMATION

Mixed ADC	0.854	0.785		Mixed ADC	0.648	0.579	
ADC	0.782	0.713	0.691	ADC	0.576	0.507	0.485
3-digit	0.684	0.615	0.593	3-digit	0.478	0.409	0.387
5-digit	0.530	0.461	0.439	5-digit	0.324	0.255	0.233

NONAUTOMATION

(including nonmachinable letters weighing 4 oz. (0.25 lb.) or less; these pieces cannot be entered at a DDU and must be prepared as letters.)

Mixed ADC	0.881	0.812		Mixed ADC	0.675	0.606	
ADC	0.800	0.731	0.709	ADC	0.594	0.525	0.503
3-digit	0.736	0.667	0.645	3-digit	0.530	0.461	0.439
5-digit	0.611	0.542	0.520	5-digit	0.405	0.336	0.314

PARCELS

Pieces weighing 3.3 oz. (0.2063 lb.) or less

MARKETING

Mixed NDC *	2.725			Mixed NDC *	2.559		
NDC *	2.247	2.131		NDC *	2.081	1.965	
SCF *		1.761	1.728	SCF *		1.595	1.562
5-digit		0.817	0.784	5-digit		0.651	0.618

* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041

* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041

IRREGULAR

Commercial rate Standard Mail regular and irregular parcels are now among the competitive products.

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Mixed NDC *	2.913		
NDC *	2.552	2.432	
SCF *		1.600	1.549
5-digit		0.614	0.563

* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041

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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

USPS MARKETING MAIL

Commercial Rates (\$)						Nonprofit Rates (\$)					
DESTINATION ENTRY RATES						DESTINATION ENTRY RATES					
	None	NDC	SCF	DDU		None	NDC	SCF	DDU		
per pc.+	per lb.	per lb.	per lb.	per lb.		per pc.+	per lb.	per lb.	per lb.	per lb.	
FLATS											
Pieces weighing more than 4.0 oz. (0.25 lb.)											
CARRIER ROUTE											
(Including carrier route letters weighing over 4.0 ounces; not eligible for DDU entry; preparation as letters required)											
Basic (other pallet)	0.171	0.877	0.651	0.606	0.601	Basic (other pallet)	0.122	0.709	0.483	0.438	0.433
Basic (5-digit pallet)	0.149	0.877	0.651	0.606	0.601	Basic (5-D pallet)	0.100	0.709	0.483	0.438	0.433
High Density (other pallet) #	0.150	0.680	0.497	0.434	0.358	High Density (other pallet) #	0.102	0.508	0.325	0.262	0.186
High Density (5-d pallet) #	0.138	0.680	0.497	0.434	0.358	High Density (5-d pallet) #	0.090	0.508	0.325	0.262	0.186
High Density Plus (other plt) #	0.105	0.680	0.497	0.434	0.358	High Density Plus (other plt) #	0.054	0.508	0.325	0.262	0.186
High Density Plus (5-d pallet) #	0.095	0.680	0.497	0.434	0.358	High Density Plus (5-d pallet) #	0.044	0.508	0.325	0.262	0.186
Saturation (other pallet) #	0.091	0.680	0.497	0.434	0.358	Saturation (other pallet) #	0.042	0.508	0.325	0.262	0.186
Saturation (5-digit pallet)#	0.084	0.680	0.497	0.434	0.358	Saturation (5-digit pallet)#	0.035	0.508	0.325	0.262	0.186
Saturation EDDM (other plt)#	0.092	0.680	0.497	0.434	0.358	Saturation EDDM (other plt)#	0.043	0.508	0.325	0.262	0.186
Saturation EDDM (5-d pallet)#	0.085	0.680	0.497	0.434	0.358	Saturation EDDM (5-d pallet)#	0.036	0.508	0.325	0.262	0.186
# -Surcharge – detached address labels, each – \$0.065 (w/o ads); \$0.080 (w/ads)						# -Surcharge – detached address labels, each – \$0.065 (w/o ads); \$0.080 (w/ads)					
AUTOMATION											
Mixed ADC	0.582	1.087	0.811			Mixed ADC	0.416	0.927	0.651		
ADC	0.510	1.087	0.811	0.723		ADC	0.344	0.927	0.651	0.563	
3-digit	0.412	1.087	0.811	0.723		3-digit	0.246	0.927	0.651	0.563	
5-digit	0.258	1.087	0.811	0.723		5-digit	0.092	0.927	0.651	0.563	
NONAUTOMATION											
(Including nonmachinable letters weighing over 4.0 ounces; and nonautomation Saturation, High Density Plus, and High Density letters weighing over 4.0 ounces; not eligible for DDU entry; preparation as letters required)											
Mixed ADC	0.609	1.087	0.811			Mixed ADC	0.443	0.927	0.651		
ADC	0.528	1.087	0.811	0.723		ADC	0.362	0.927	0.651	0.563	
3-digit	0.464	1.087	0.811	0.723		3-digit	0.298	0.927	0.651	0.563	
5-digit	0.339	1.087	0.811	0.723		5-digit	0.173	0.927	0.651	0.563	
PARCELS											
MACHINABLE											
Pieces weighing more than 3.5 oz. (0.21875 lb.)											
Commercial rate machinable parcels are now among the competitive products.					Mixed NDC *	1.780	1.453				
					NDC *	1.217	1.453				0.872
					5-digit	0.434		0.872	0.624	0.547	
* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041											
MARKETING											
Pieces weighing more than 3.3 oz. (0.2063 lb.)											
Mixed NDC *	2.402	1.565				Mixed NDC *	2.282	1.342			
NDC *	1.924	1.565	1.005			NDC *	1.804	1.342			
SCF *	1.554		1.005	0.842		SCF *	1.434		0.782	0.619	
5-digit	0.610		1.005	0.842	0.654	5-digit	0.490		0.782	0.619	0.431
* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041						* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041					
IRREGULAR											
Pieces weighing more than 3.3 oz. (0.2063 lb.)											
Commercial rate irregular parcels are now among the competitive products.					Mixed NDC *	2.613	1.453				
					NDC *	2.252	1.453				0.872
					SCF *	1.420		0.872	0.624		
					5-digit	0.434		0.872	0.624	0.547	
* Surcharge, nonbarcoded pieces, unless sorted to 5-digit ZIPs, each – \$0.041											
SATURATION/CARRIER ROUTE (Simple Samples)											
Surcharge for use of detached address labels, each – \$0.065 (w/o ads); \$0.080 (w/ads)											
Mailing Volume Tier	Sat/Every Door		CR/Targeted			Mailing Volume Tier	Sat/Every Door		CR/Targeted		
	Small ¹	Large ²	Small ¹	Large ²			Small ¹	Large ²	Small ¹	Large ²	
0-200,000	0.380	0.438	0.527	0.583		0-200,000	0.285	0.329	0.394	0.438	
200,001 and above	0.365	0.424	0.510	0.568		200,001 and above	0.275	0.318	0.384	0.427	
Handling fee:						Handling fee:					
DNDC pallet/3-digit presort	66.554		66.554			DNDC pallet/3-digit presort	53.243		53.243		
DNDC pallet/5-digit presort	108.214		108.214			DNDC pallet/5-digit presort	86.571		86.571		
DSCF pallet/5-digit presort	50.700		50.700			DSCF pallet/5-digit presort	40.705		40.705		
3-D pllt presort, per carton/sack	9.063		9.063			3-D pllt presort, per carton/sack	7.385		7.385		
¹ Small: not more than 6 inches long or 4 inches high or 1.5 inches thick.											
² Large: more than 6 inches long or 4 inches high or 1.5 inches thick, but not more than 12-inches long or 9 inches high or 2 inches thick. ©2021 Mailers Hub LLC											
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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

PERIODICALS

Application Fees: Original entry – \$855.00; Reentry – \$110.00; News agents – \$110.00
Ride-Along items, each – \$0.190

	<i>Outside County; Nonprofit; Classroom; Limited Circulation</i>	<i>Science-of-Agriculture</i>	<i>Within County</i>	
Pound rates – Advertising portion (per pound) (\$)			Pound Rates (per pound) (\$)	
DDU entry	0.120	0.090	Delivery Unit (Auto/nonauto)	0.156
DSCF entry	0.176	0.132	All other zones (Auto/nonauto)	0.204
DADC entry	0.188	0.141	Piece rates (each) (\$) **	
Zones 1&2	0.294	0.220	Automation letter *	
Zone 3	0.294	0.220	5-digit	0.059
Zone 4	0.294	0.220	3-digit	0.083
Zone 5	0.294	0.220	Basic	0.091
Zone 6	0.294	0.220	Automation flat *	
Zone 7	0.294	0.220	5-digit	0.163
Zone 8	0.294	0.220	3-digit	0.212
Zone 9	0.294	0.220	Basic	0.234
Pound rates – Nonadvertising portion (per pound) (\$)			Nonautomation (all shapes)	
			5-digit	0.215
			3-digit	0.268
			Basic	0.303
DDU entry	0.090	0.086	Carrier route (all shapes) *	
DSCF entry	0.132	0.125	Basic	0.085
DADC entry	0.141	0.134	High density	0.059
Other entry (all zones)	0.185	0.176	Saturation	0.039
			Discount – DDU entry	0.012

Piece rates (\$) each, sorted in...	Outside Cty, Sci/Agr.	N/P; C'm Ltd. Circ.	Bundle rates (\$) each, sorted to...	Outside Cty Sci/Agr.	N/P; C'm; Ltd. Circ.
Auto letter * **			Firm bundle		
5-digit bundle	0.317	0.301	CR sack/pallet	0.165	0.157
SCF/3-digit bundle	0.341	0.324	5-digit sack/pallet	0.165	0.157
ADC bundle	0.347	0.330	SCF/3-digit sack/pallet	0.428	0.407
Mixed ADC bundle	0.366	0.348	ADC sack/pallet	0.476	0.452
			Mixed ADC sack/pallet	0.681	0.647
Auto flat (Mach, b/c) * **			CR bundle		
5-digit bundle	0.424	0.403	CR sack/pallet	0.191	0.181
SCF/3-digit bundle	0.555	0.527	5-digit sack/pallet	0.191	0.181
ADC bundle	0.595	0.565	SCF/3-digit sack/pallet	0.687	0.653
Mixed ADC bundle	0.659	0.626	ADC sack/pallet	0.927	0.881
			Mixed ADC sack/pallet	1.201	1.141
Mach non-b/c letters or flats			5-D bundle		
5-digit bundle	0.446	0.424	5-digit sack/pallet	0.395	0.375
SCF/3-digit bundle	0.595	0.565	SCF/3-digit sack/pallet	0.467	0.444
ADC bundle	0.640	0.608	ADC sack/pallet	0.597	0.567
Mixed ADC bundle	0.720	0.684	Mixed ADC sack/pallet	0.893	0.848
Nonmach b/c flat * **			SCF/3-D bundle		
5-digit bundle	0.627	0.596	SCF/3-digit sack/pallet	0.410	0.390
SCF/3-digit bundle	0.728	0.692	ADC sack/pallet	0.546	0.519
ADC bundle	0.776	0.737	Mixed ADC sack/pallet	0.847	0.805
Mixed ADC bundle	0.901	0.856	ADC bundle		
			ADC sack/pallet	0.435	0.413
Nonmach non-b/c flats and parcels			Mixed ADC sack/pallet	0.727	0.691
5-digit bundle	0.629	0.598	MXD ADC bundle	0.239	0.227
SCF/3-digit bundle	0.728	0.692			
ADC bundle	0.782	0.743			
Mixed ADC bundle	0.901	0.856			
All shapes * **					
Basic CR bundle	0.225	0.214			
HD CR bundle	0.192	0.182			
Saturation CR bundle	0.170	0.162			
Firm bundle, each	0.220	0.209			
Adjustment per 1% nonadvertising content	0.00112	0.00106			

Tray rates (\$) each, entered at ...	Out. Cty, Sci/Agr.	N/P; C'm Ltd. Circ.	Sack rates (\$) each, entered at ...	Out. Cty, Sci/Agr.	N/P; C'm Ltd. Circ.	Pallet rates (\$) each, entered at...	Out. Cty, Sci/Agr.	N/P; C'm Ltd. Circ.
5-digit/CR tray			5-digit/CR sack			CR pallet		
Origin	4.330	4.114	Origin	4.373	4.154	Origin	80.891	76.846
DNDC	3.190	3.031	DNDC	4.286	4.072	DNDC	57.484	54.610
DADC	2.952	2.804	DADC	3.979	3.780	DADC	56.871	54.027
DSCF	2.155	2.047	DSCF	2.356	2.238	DSCF	30.623	29.092
DDU	1.434	1.362	DDU	1.580	1.501	DDU	3.062	2.909
SCF/3-digit tray			SCF/3-digit sack			5-digit pallet		
Origin	3.558	3.380	Origin	3.833	3.641	Origin	96.791	91.951
DNDC	2.444	2.322	DNDC	3.526	3.350	DNDC	73.384	69.715
DADC	2.341	2.224	DADC	3.373	3.204	DADC	72.771	69.132
DSCF	1.278	1.214	DSCF	1.401	1.331	DSCF	46.523	44.197
ADC tray			ADC sack			SCF/3-digit pallet		
Origin	3.712	3.526	Origin	3.852	3.659	Origin	76.341	72.524
DNDC	2.415	2.294	DNDC	3.467	3.294	DNDC	54.874	52.130
DADC	1.375	1.306	DADC	1.972	1.873	DADC	54.564	51.836
MXD ADC tray			MXD ADC sack			DSCF	28.566	27.138
Origin	1.318	1.252	Origin	1.733	1.646			
						ADC pallet		
						Origin	77.252	73.389
						DNDC	53.756	51.068
						DADC	29.508	28.033
						MXD ADC pallet		
						Origin	20.091	19.086

* Discount, for each barcoded or carrier route letter or flat that meets the standards for the Full-Service Intelligent Mail option, per piece, \$0.001.

** Pieces eligible for Seamless Acceptance and prepared under the Full-Service Intelligent Mail option, discount per piece – \$0.001.

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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

PACKAGE SERVICES

Bound Printed Matter

Destination entry mailing fee (annual): \$275.00

(Fee does not apply to mailers using the Electronic Verification System (eVS) or to mailers using a permit imprint to mail only BPM parcels.)

Nonpresorted (Single-Piece)

Parcels ¹ and other pieces								Flats ^{2, 3}							
Weight (lbs.)	Zone							Weight (lbs.)	Zone						
	1 & 2	3	4	5	6	7	8 & 9		1 & 2	3	4	5	6	7	8 & 9
1.0	\$3.59	\$3.59	\$3.59	\$3.59	\$3.59	\$3.59	\$3.59	1.0	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33	\$2.33
1.5	3.68	3.68	3.68	3.68	3.68	3.68	3.68	1.5	2.46	2.46	2.46	2.46	2.46	2.46	2.46
2.0	3.77	3.77	3.77	3.77	3.77	3.77	3.77	2.0	2.59	2.59	2.59	2.59	2.59	2.59	2.59
2.5	3.93	3.93	3.93	3.93	3.93	3.93	3.93	2.5	2.74	2.74	2.74	2.74	2.74	2.74	2.74
3.0	4.10	4.10	4.10	4.10	4.10	4.10	4.10	3.0	2.88	2.88	2.88	2.88	2.88	2.88	2.88
3.5	4.29	4.29	4.29	4.29	4.29	4.29	4.29	3.5	3.04	3.04	3.04	3.04	3.04	3.04	3.04
4.0	4.45	4.45	4.45	4.45	4.45	4.45	4.45	4.0	3.22	3.22	3.22	3.22	3.22	3.22	3.22
4.5	4.62	4.62	4.62	4.62	4.62	4.62	4.62	4.5	3.39	3.39	3.39	3.39	3.39	3.39	3.39
5.0	4.79	4.79	4.79	4.79	4.79	4.79	4.79	5.0	3.57	3.57	3.57	3.57	3.57	3.57	3.57
6.0	5.13	5.13	5.13	5.13	5.13	5.13	5.13	6.0	3.77	3.77	3.77	3.77	3.77	3.77	3.77
7.0	5.49	5.49	5.49	5.49	5.49	5.49	5.49	7.0	3.98	3.98	3.98	3.98	3.98	3.98	3.98
8.0	5.82	5.82	5.82	5.82	5.82	5.82	5.82	8.0	4.20	4.20	4.20	4.20	4.20	4.20	4.20
9.0	6.17	6.17	6.17	6.17	6.17	6.17	6.17	9.0	4.43	4.43	4.43	4.43	4.43	4.43	4.43
10.0	6.49	6.49	6.49	6.49	6.49	6.49	6.49	10.0	4.67	4.67	4.67	4.67	4.67	4.67	4.67
11.0	6.87	6.87	6.87	6.87	6.87	6.87	6.87	11.0	4.93	4.93	4.93	4.93	4.93	4.93	4.93
12.0	7.19	7.19	7.19	7.19	7.19	7.19	7.19	12.0	5.20	5.20	5.20	5.20	5.20	5.20	5.20
13.0	7.53	7.53	7.53	7.53	7.53	7.53	7.53	13.0	5.49	5.49	5.49	5.49	5.49	5.49	5.49
14.0	7.89	7.89	7.89	7.89	7.89	7.89	7.89	14.0	5.79	5.79	5.79	5.79	5.79	5.79	5.79
15.0	8.23	8.23	8.23	8.23	8.23	8.23	8.23	15.0	6.11	6.11	6.11	6.11	6.11	6.11	6.11

Presorted

Flats – Other than Destination Entry ^{2, 3}							
Rate	Zone						
	L/1&2	3	4	5	6	7	8&9
Per Pk.	\$1.413	\$1.413	\$1.413	\$1.413	\$1.413	\$1.413	\$1.413
+Per lb.	0.200	0.200	0.200	0.200	0.200	0.200	0.200

Flats – Destination Entry ^{2, 3}							
Rate	DDU *	DSCF	DNDC – Zone				
			1&2	3	4	5	
Per Pk.	\$0.595	\$0.806	\$1.298	\$1.298	\$1.298	\$1.298	
+Per lb.	0.029	0.044	0.100	0.100	0.100	0.100	

* DDU rate not available for flats weighing one lb. or less

Parcels and Irregular Parcels – Other than Destination Entry							
Rate	Zone						
	1&2	3	4	5	6	7	8&9
Per Pk.	\$1.756	\$1.756	\$1.756	\$1.756	\$1.756	\$1.756	\$1.756
+Per lb.	0.302	0.302	0.302	0.302	0.302	0.302	0.302

Parcels and Irregular Parcels – Destination Entry							
Rate	DDU	DSCF	DNDC * – Zone				
			1&2	3	4	5	
Per Pk.	\$0.941	\$1.158	\$1.643	\$1.643	\$1.643	\$1.643	
+Per lb.	0.059	0.086	0.147	0.147	0.147	0.147	

Carrier Route

Flats – Other than Destination Entry ^{2, 3}							
Rate	Zone						
	L/1&2	3	4	5	6	7	8&9
Per Pk.	\$1.261	\$1.261	\$1.261	\$1.261	\$1.261	\$1.261	\$1.261
+Per lb.	0.200	0.200	0.200	0.200	0.200	0.200	0.200

Flats – Destination Entry ^{2, 3}							
Rate	DDU *	DSCF	DNDC – Zone				
			1&2	3	4	5	
Per Pk.	\$0.443	\$0.654	\$1.146	\$1.146	\$1.146	\$1.146	
+Per lb.	0.029	0.044	0.100	0.100	0.100	0.100	

* DDU rate not available for flats weighing one lb. or less

Parcels and Irregular Parcels – Other than Destination Entry							
Rate	Zone						
	1&2	3	4	5	6	7	8&9
Per Pk.	\$1.601	\$1.601	\$1.601	\$1.601	\$1.601	\$1.601	\$1.601
+Per lb.	0.302	0.302	0.302	0.302	0.302	0.302	0.302

Parcels and Irregular Parcels – Destination Entry							
Rate	DDU	DSCF	DNDC – Zone				
			1&2	3	4	5	
Per Pk.	\$0.786	\$1.003	\$1.488	\$1.488	\$1.488	\$1.488	
+Per lb.	0.059	0.086	0.147	0.147	0.147	0.147	

¹ Pickup on Demand Service, per stop: \$25.00.

² Discount, for each presorted or carrier route barcoded flat that meets the standards for the full-service Intelligent Mail option, per piece, \$0.001.

³ Pieces eligible for Seamless Acceptance and prepared under the Full-Service Intelligent Mail option, discount per piece – \$0.001.

Media Mail ¹

First pound or fraction	
Single-piece rate	\$ 3.49
5-digit presort rate	2.17
Basic presort rate	3.26
Each additional pound or fraction, up to 7 lbs.	0.67
Over 7, up to 70 lbs.	0.70

Library Mail ¹

First pound or fraction	
Single-piece rate	\$ 3.32
5-digit presort rate	2.06
Basic presort rate	3.10
Each additional pound or fraction, up to 7 lbs.	0.63
Over 7, up to 70 lbs.	0.66

Alaska Bypass Service (per 70 pounds or fraction)

Zones 1&2	\$ 31.15
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Overweight Item Charge (Items exceeding 70 pounds)

Each	\$ 100.00
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PRC APPROVED MARKET DOMINANT PRICES TO BE EFFECTIVE JULY 10, 2022

SELECTED FEES, SPECIAL SERVICES, and ANCILLARY SERVICES

COD		Address Correction		Business Reply Mail	
To be collected		Manual correction, each		Permit, per year (all categories) *	
\$0.01-50.00	\$ 9.20	First-Class Mail, on-piece		\$ 275.00	
\$50.01-100.00	11.40	Other		Regular, no maintenance fee	
\$100.01-200.00	13.90	Electronic correction, each		Per-piece charge	
\$200.01-300.00	16.40	First-Class Mail		Regular, with maintenance fee	
\$300.01-400.00	18.90	Other		Account maintenance fee, per year	
\$400.01-500.00	21.40	Automated correction, each (letters only)		Per-piece charge	
\$500.01-600.00	23.90	Intelligent Mail, full-service		Qualified BRM, low-volume	
\$600.01-700.00	26.40	First two notices for an address		Account maintenance fee, per year	
\$700.01-800.00	28.90	First-Class Mail		Per-piece charge	
\$800.01-900.00	31.40	USPS Marketing Mail		Qualified BRM, high-volume	
\$900.01-1,000.00	33.90	Additional notices for an address		Account maintenance fee, per year	
COD Restricted Delivery	6.25	First-Class Mail		Fee, per quarter	
Certified Mail		USPS Marketing Mail		Per-piece charge	
Fee, per piece, in addition to postage		Address List Services		Bulk Weight-Averaged (Nonletters only)	
w/ Restricted Delivery and/or Adult Sig.		Correction of Mailing Lists		Account maintenance fee, per year	
Insurance		Per submitted address		Per-piece charge, bulk weight avg.	
Regular *		Minimum charge per list (30 items)		Maintenance fee, per month	
\$0.01-50.00		ZIP Code Sortation of Address Lists		* Fee does not apply to permit holder who receives (1)	
\$50.01-100.00		Per 1,000 addresses or fraction		only Qualified Business Reply Mail, or (2) only parcel-	
Bulk *		Sequencing of Address Cards		shaped Business Reply Mail.	
Subtract \$0.80 per piece from the applicable		Each correction		USPS Tracking	
price for Merchandise Coverage.		Insertion of blanks		USPS Marketing Mail (parcels only)	
Insurance Restricted Delivery		COA Information for election boards		Electronic	
* Insurance up to \$5,000 available at fees based		Per change of address		Stamped Stationery *	
on value		City/State file (per year)		Plain stamped envelopes	
Caller Service		Delivery Statistics file (per year)		Basic, size 6½, each	
Semi-annual fee		DMM Labeling Lists		Basic, size 6½, 500	
Group 1		DPV System (per year)		Basic, size 10, each	
Group 2		Five-Digit ZIP file (per year)		Basic, size 10, 500	
Group 3		Official National Zone Charts (per yr.)		Personalized stamped envelopes	
Group 4		Z4 Change (per year)		Basic, size 6½, 50	
Group 5		99 Percent Accurate Method		Basic, size 6½, 500	
Group 6		Per 1,000 address per year		Basic, size 10, 50	
Group 7		Minimum per year		Basic, size 10, 500	
Annual call number reservation fee		Special Handling		Stamped cards	
Parcel Airlift (PAL)		Fragile, all weights		Single card	
Pieces weighing: up to 2 lbs.		Registered Mail		Double reply-paid card	
over 2, up to 3 lbs.		Declared Value * \$ 0.00		Sheet of 40 cards (uncut)	
over 3, up to 4 lbs.		0.01-100.00		* Plus shipping; premium options avail. at add'l. cost.	
over 4, up to 30 lbs.		100.00-500.00		Signature Confirmation	
Return Receipts		500.01-1,000.00		FCM/FCM Package Service; Package Services; USPS	
Requested at time of mailing		1,000.01-2,000.00		Retail Ground; Parcel Select (ex. LtWt.); & Priority Mail	
Original signature (hard copy)		2,000.01-3,000.00		Electronic	
Copy of signature (electronic)		3,000.01-4,000.00		Retail	
Permit Fee		4,000.01-5,000.00		Restricted Delivery	
Authorization to use permit imprint		Registered Mail Restricted Delivery		Money Orders	
(one-time fee)		Registered COD		Domestic (\$0.01-500.00)	
Certificate of Mailing		* Coverage to \$15 million available at additional cost.		Domestic (\$500.01-1,000.00)	
Individual pieces		Bulk Parcel Return Service		APO/FPO/DPO (\$0.01-1,000.00)	
Original Certificate of Mailing, Form 3817,		Per-piece charge		Shipper-Paid Forwarding	
individual article presented at retail		Post Office Boxes		Account maintenance fee, per year	
Three or more pcs individually listed on		Box			
Form 3665-Firm or USPS-approved customer		Size			
provided manifest (per piece listed)					
Each add'l copy of original Cert. of Mail-					
ing, or original mailing receipt (Form					
3877) for Registered Mail, insured mail,					
Certified Mail, and COD mail (each copy)					
Quantity of pieces					
Up to 1,000 identical-weight pieces (one					
Form 3606 for total number)					
Each add'l 1,000 identical-wt pcs/fraction					
Each add'l copy of the original Form 3606					