CASS[™] Cycle L Issues

This document provides policy clarifications to CASS Cycle L requirements that have been identified. Where the topic discussed is addressed within Licensee Performance Requirement (LPR) documentation, the LPR documents take precedence over this document.

LACS^{Link}™ Return Information Usage

Issue: Concerns about updating address fields with LACS^{Link} new address. Mailers report they have regulatory / policy restrictions that prevent them from changing a customer address without direct contact from the customer.

The U. S. Postal Service® will allow mailers who do not want to update their customer's original address information when LACS^{Link} returns a new address to retrieve only the ZIP + 4® code and delivery point for the new address and use it in conjunction with the original address. This allowance to maintain the old address and use it with the new address ZIP + 4 Code and delivery point value is an interim solution and is subject to change in future CASS cycles. Mailers should be advised that there is a limited period in which the old address is present in the ZIP + 4 data and they should update their address to avoid potential loss of automation discounts.

Where the mailer uses the LACS^{Link} new address ZIP + 4 code with the original address, the mailer <u>must</u> use the delivery point value associated with the new address. If the mailer does not separately store the delivery point value, they cannot use the ZIP + 4 code for the new address unless they are also using the new address text. This is needed to insure that any barcode produced on a mailpiece containing the original address text and the new address ZIP + 4 code can be delivery point sequenced based on the last two-digits of the new address.

Where an input address is matched to a ZIP + 4 record that indicates a LACS conversion exists, the mailer has the option to retain the original address and its associated ZIP + 4 code if the original address delivery point validates. The original address and its ZIP + 4 code / delivery point value can be used to construct a delivery point barcode.

CASS Certified[™] address matching software that makes changes in their software to support this allowance are not required to undergo CASS recertification. Software developers are required to provide notification to the CASS Department advising of the change prior to issuing software with the changes incorporated.

Note: MLOCR processing should refer to existing CASS/MASS[™] requirements.

Note: Refer to the LACS^{Link} Licensee Performance Requirements for additional information.

DirectDPV™ Processing

Issue: Software vendors are unclear about how DirectDPV can be used. Additionally, questions have arisen whether DirectDPV can be used as a utility product or whether is must be provided as an integrated component within a CASS Certified[™] address matching software product.

Givens:

- DirectDPV is currently made available only as part of the DPV[™] Product fulfillment to DPV-licensed, CASS Certified address matching software authors.
- DirectDPV is provided to Full Service Bureau licensees for their use in combination with their DPV Product.

DirectDPV is a tool to allow mailers to prescreen address records that have previously been ZIP + 4[®] coded using CASS Certified Cycle L software in an authorized mode. DirectDPV contains either a ZIP + 4 or a ZIP + 4 and a delivery point value for addresses known to the Postal Service[™] to have undergone a change which would require an update to the address maintained in the mailer's file. This means that addresses that have not changed will not require reprocessing, reducing the processing time associated with CASS[™] reprocessing.

To use DirectDPV, the mailer must store, at a minimum, the complete ZIP + 4 code for each address. If the ZIP + 4 code is not present in an address record, DirectDPV cannot be used and the address needs to be resubmitted for CASS processing. It is recommended that the delivery point value be stored in addition to the ZIP + 4 code. If the delivery point value is not stored, the address can be looked up in the DirectDPV process using the ZIP + 4 code only.

Where the comparison of the ZIP + 4 or the ZIP + 4 code and delivery point value from the mailer's address record do not appear in the DirectDPV data, the address retains its eligibility to be counted as a ZIP + 4 coded address on PS Form 3553, CASS Summary Report. Where the ZIP + 4 code or ZIP + 4 code and delivery point value is found in the DirectDPV data, the address must be either recreated from the DirectDPV data or must be resubmitted to CASS software and updated to qualify for automation rates.

Any process involving the use of DirectDPV requires certification prior to authorized use. A utility test will be provided that exercises the DirectDPV function and verifies that it has been correctly implemented and the tabulation of statistics on PS Form 3553 is correct.

Use of DirectDPV does not alter the mailer requirement to validate addresses every 180 days using CASS Certified software to qualify for automation rates, except that DirectDPV is an authorized process to use in meeting the 180 day validation process. The Postal Service will require all addresses within the mailer's file be resubmitted to a CASS Certified address matching process on an annual basis regardless of whether DirectDPV is used to maintain the address file.

Note: Refer to the DPV Licensee Performance Requirements for additional information.

DPV[™] Stop Processing

Issue 1: Concerns exist that the Stop Processing requirement used as a security feature of DPV will cause CASS[™] processing to be terminated and cause business interruption.

The Postal Service[™] believes that the concerns expressed regarding the DPV Stop Processing requirement are unwarranted. Several years of use of the DPV Product with hundreds of millions addresses processed and exposed to the Stop Processing function has not demonstrated that a problem exists, except where there was an unauthorized use of DPV.

The Postal Service is willing to give consideration of allowing a Stop Processing reportonly process to be used for mailing activities demonstrating a low-risk of abuse. This will
typically include instances where processing of finished mail on MLOCR equipment
occurs and other instances where the use of DPV is used in the immediate production of
mail. In considering whether to allow the use of the Stop Processing report-only option,
the user will be required to demonstrate to Postal Service satisfaction that their ability to
prepare and enter mail would suffer a severe negative impact by the termination of the
CASS software. The user will be required to complete an agreement to immediately
report any instances when a Stop Processing incident involving the DPV software
occurs. When the Stop Processing incident of DPV software can be responded to in a
reasonable timeframe that minimizes the impact associated with mail production, the
Postal Service will require that the Stop Processing termination function remain in place
and the user will be required to contact their CASS software vendor for a restart code, as
presently defined.

Issue 2: MLOCR service providers are concerned about the requirement that any DPV matches that result in a Stop Processing action be separately sorted from the other mailpieces. The effect of the requirement is that they would have to allocate a dedicated bin on their equipment to capture these mailpieces, which results in a costly design requirement.

The Postal Service will modify the Stop Processing requirement within the Licensee Performance Requirements for MLOCR systems to allow the transmission of a notification record and not require an image or copy of the actual mailpiece.

Note: Refer to the DPV Licensee Performance Requirements for additional information.

Product Combination / Integration

Issue: Questions exist about whether DPV[™] and LACS^{Link™} products can be used separate from CASS Certified[™] software or whether they can only be used from within a CASS Certified software product.

There is interest by various users to combine ZIP + 4[®] DPV and LACS^{Link} products from multiple sources, including commercial and internally-developed sources, which can then be used to qualify mail for automation rates. An example of this was presented as, "Can a user take an address matching and standardization product supplied by Vendor A that does not include DPV and LACS^{Link}, another address matching and standardization product from Vendor B that also does not include DPV or LACS^{Link}, a DPV utility product supplied from Vendor C that does neither address standardization or LACS^{Link}, and a internally-developed LACS^{Link} utility that does neither address standardization or DPV, and combine all of these standalone products into configuration that accomplishes all functions and thus meet the requirements under CASS[™] Cycle L and qualify mail for automation rates?" The purpose of such configuration is to obtain optimized performance by using the most efficient products suitable for each given task.

In responding to this issue, it is necessary to establish that:

- 1) The DPV Product is only licensed to original authors of CASS Certified address matching software for their integration into a CASS Certified product.
- 2) Only Full-Service Bureau licensees are granted an exception to Item 1 and are allowed to obtain and/or use DPV as a separate function of their license.
- 3) Under CASS Cycle L, CASS Certified status refers only to address matching software products that include the use of DPV and LACS^{Link}.

Given the above established facts, the answer is typically "No, a user cannot perform combination of individual products to meet CASS Cycle L requirements and qualify mail at automation rates." This is based on the requirement that to obtain DPV a user must first be the original address matching software author, where the responsibility for developing the security features required of DPV use are burdened. Since CASS Cycle L requires inclusion of DPV and LACS^{Link} products, and DPV is only provided to original authors of CASS Certified address matching software, then a user could never meet the test of CASS Certified status without having both DPV and LACS^{Link} already incorporated into the product.

The only exception to the above is where the user is a Full Service Bureau licensee who can obtain DPV outside of the requirement to be a CASS Certified address matching software author. A Full Service Bureau licensee could combine the standalone products into a finished product that would be required to be submitted for CASS certification.

Use of CASS Certified™ Software in a Call Center Operation

Issue: Mailers are unclear about the allowable uses of CASS software within Call Center operations. Specifically, can an address be standardized and assigned a ZIP + 4 code regardless of whether the primary address can be delivery point validated?

Where a mailer uses CASS certified software product in a call center operation to validate customer address information, the mailer can make full use of the CASS data. When the address is submitted for standardization and delivery point validation, it can be checked using DPV to determine the accuracy of the primary and secondary address values. All informational return codes and match footnotes can be interrogated and used to interact with the customer to improve the address quality.

If the primary address does not DPV confirm, the input address can be standardized and a 5-digit ZIP Code assigned to the address, but it <u>may not be updated with the ZIP + 4 code</u> prior to being recorded in the mailer address file.

Any address obtaining a ZIP + 4 code assignment using an interactive process to capture and match the address is ineligible for inclusion in the PS Form 3553 statistics and <u>does not</u> qualify for postal automation rates. The address must be subsequently validated using a batch process with CASS certified software to qualify for automation rates.

CASS Certified[™] software used within a call center operation may be allowed to use the Stop Processing report-only option in lieu of the termination function.

Note: Refer to the DPV Licensee Performance Requirements for additional information.

International Use

The Postal Service[™] has published previous policy that defines the prohibition on shipping the DPV[™] database outside of the United States.

Issue 1: Questions have been asked whether the prohibition on international distribution of DPV also prevents any access to DPV by technical support personnel residing outside the United States. For example, can a system administrator from outside the US access a computer installed within the US to perform normal functions such as product updates, technical support, backup, etc.

There are no restrictions that prevent anyone outside of the United States from performing routine technical support and system administration functions on computer systems where DPV is involved. A system administrator from outside of the US can install the DPV updated data files, perform necessary backup functions, submit jobs for DPV processing, etc.

The only prohibition that would apply is that the DPV data file(s) cannot be copied from a US-installed computer system to a computer system outside of the US, regardless of purpose. The responsibility for protecting the security of the DPV data resides with the end user and any violation that occurs may result in the end user being disallowed from using DPV.

Issue 2: Can a foreign-national within the US access or perform technical support involving DPV?

The Postal Service does not restrict the ability of a foreign-national within the US to access or perform technical service support where DPV is involved.

Issue 3: The Postal Service states that the DPV data must reside within the US. Can a company outside of the US rent an office within the US and place a server there that holds the DPV data and access the DPV data remotely without there being any employees or assets of the company at the location?

The Postal Service requires that the DPV database be under the administration of a US entity that exists within the US for the primary purpose of doing business with the US public or other domestic entities. It is not sufficient to simply establish a mailing address or minimal business presence within the US solely for the purpose of obtaining DPV for use from outside of the US.

Definition of Software Developer

Issue: The Postal Service[™] does not have a published definition describing the term "software developer" as it applies to licensing access to the DPV[™] product. This has led to cases where software developers have been provided conflicting instructions as to whether or not they can license and market DPV.

It is the intention of the Postal Service that DPV shall only be licensed to those software developers who are the original authors of the programming logic that performs the ZIP + 4[®] assignments per the specifications of the CASS[™] requirements. The burden to make DPV work within the CASS Certified[™] environment is placed upon these original authors as part of the decision process for selecting and providing ZIP + 4 codes. The additional burden is placed upon these software authors to implement DPV security features and supply their DPV-enabled product in such a manner that it can only be accessed by their specific product and no other.

DPV is not intended for direct licensing from the U. S. Postal Service® to other entities who may act as software integrators that combine a front-end interface with a ZIP + 4 coding engine, either through object module access, Application Program Interface libraries, or other such configurations or methods. Any software integrator or other entity who wishes to have access to DPV must obtain the DPV product as part of the CASS Certified software supplied by the original software author.

The U. S. Postal Service reserves the right in the future to create other DPV licensing criteria.