

## FAQ on Move Update Compliance for Non-US Mailers

The U.S. Postal Service® has gathered some common questions asked by foreign mailers. Chief among these questions: How may a foreign mailer sending Standard Mail® into the United States meet the new Move Update requirement?

A foreign mailer can use NCOA<sup>Link</sup>®, NCOA<sup>Link</sup>® MPE, ACST<sup>TM</sup> (Full-Service, OneCode ACS<sup>®</sup> or Traditional), and Ancillary Service Endorsements with some restrictions.

Please review these common questions and answers for information on the use of each Move Update method.

### NCOA<sup>Link</sup>®

**Q1. My company in Canada conducts surveys of US households and uses Standard Mail to send information to US addresses about different products and services. We would like to use NCOA<sup>Link</sup> to comply with the new Move Update standard. Do we have to get pre-approval from the USPS to use NCOA<sup>Link</sup> to meet the Move Update standard?**

A1. The License Agreement between the NCOA<sup>Link</sup> Service Provider and the US Postal Service does not allow the NCOA<sup>Link</sup> Service Provider to process lists that originate outside of the United States. To accommodate foreign mailers that are entering mail directly into the US, a special process has been established to allow foreign mailers to satisfy the Move Update requirement by using NCOA<sup>Link</sup> to update their address list. Before any NCOA<sup>Link</sup> Service Provider can process an address list originating from a foreign source, the NCOA<sup>Link</sup> Service Provider must first contact the NCSC Licensing & Certification department @ 800-589-5766 and obtain pre-approval to process the foreign mailer's address list.

**Q2. What is the process by which a non-US mailer can be approved to use NCOA<sup>Link</sup> processing to meet the US Postal Service Move Update requirement?**

A2. Approval to process address lists from non-domestic mailers must be initiated by the NCOA<sup>Link</sup> Service Provider on behalf of the non-domestic mailer. The NCOA<sup>Link</sup> Service Provider works with the mailer to ensure that the mailer's intended use of NCOA<sup>Link</sup> processing is appropriate before requesting approval from the USPS. The NCOA<sup>Link</sup> Service Provider verifies that a properly completed Processing Acknowledgement Form (PAF) is received and that it correctly represents all parties involved in the transaction. When the NCOA<sup>Link</sup> Service Provider has all the necessary information, the Service Provider contacts the NCSC Licensing & Certification department @ 800-589-5766 to request approval to perform the processing service.

- Q3. How long does it typically take the NCOA<sup>Link</sup> Service Provider to get approval to provide processing services for a company that is outside the US?**
- A3. The US Postal Service attempts to get feedback to the NCOA<sup>Link</sup> Service Provider within 24 hours of their submission of the request.
- Q4. If the USPS has given approval to an NCOA<sup>Link</sup> Service Provider to provide NCOA<sup>Link</sup> processing for a foreign mailer, how long does the approval remain valid?**
- A4. There is no time limit on approval. The approval is good for as long as the foreign mailer continues to use the same NCOA<sup>Link</sup> Service Provider. If a mailer switches to a different NCOA<sup>Link</sup> Service Provider, the new Service Provider will request approval to process for the foreign mailer.
- Q5. We are a foreign-owned company that also has an office in the United States. Can we use our US address when requesting NCOA<sup>Link</sup> processing and does it require separate approval from the USPS before using NCOA<sup>Link</sup>?**
- A5. Yes, you may use your US address to request NCOA<sup>Link</sup> processing. The NCOA<sup>Link</sup> Service Provider is not required to seek prior approval as long as the US address is on the Processing Acknowledgement Form (PAF).
- Q6. We are approved to use NCOA<sup>Link</sup> and after updating our address list for mailing, we want to sell or rent extracts from our updated list. Are there any restrictions on how we use addresses that were updated by NCOA<sup>Link</sup>?**
- A6. The restrictions that apply are outlined in the Required Text Document (RTD) provided to you by the NCOA<sup>Link</sup> Service Provider. These restrictions apply equally to US-based companies and to non-US based companies.
- Q7. We are a US-based business that sends our address files to a company in Canada for mail creation, printing, and entry. My processor in Canada will be submitting my address file to an NCOA<sup>Link</sup> Service Provider for update. Do we have to be pre-approved by the USPS before we can use NCOA<sup>Link</sup>?**
- A7. No. Since your company resides within the United States, no special permission is needed for your NCOA<sup>Link</sup> Service Provider to process your list. It is important that you and your Canadian processor complete the Processing Acknowledgement Form to show that, as the list owner, your place of business is within the United States.
- Q8. Who is required to complete the Processing Acknowledgement Form (PAF)? I send my file to a processor who takes care of my address list and keeps it updated. Does the PAF have to be completed by me or can my processor complete a PAF on my behalf?**

A8. All parties to whom updated address information is disclosed must be identified on a PAF. The form can be filled out by any entity but the Service Provider must verify the identity of the authorized representative(s) listed on the PAF. This includes but is not limited to the List Owner and any Broker/Agent/List Administrators. The Service Provider may collect a signature or may verify the authenticity of the entities identified on the PAF through other means.

**Q9. Will a foreign mailer be allowed to use the alternative PAF renewal policy?**

A9. The September 27, 2013 NCOA<sup>Link</sup> Licensing Announcement notice announced the new optional alternative PAF renewal policy was available to Full and Limited Service and MPE Data User Licensees. It is up to each Licensee to decide whether to participate in this program. It also stated that foreign list owners were excluded from being included in this alternative PAF renewal process. This policy has been amended as of July 29, 2015 to now allow the PAFs of foreign list owners to participate in this alternative renewal process. All current guidelines for the alternative PAF renewal policy apply to both domestic and foreign PAFs.

**Q10. What is the difference between a List Administrator and a Broker? How does this affect how the PAF is completed?**

A10. A List Administrator houses, maintains, updates, and 'baby-sits' the list on behalf of the List Owner and has a contract to provide these services to the List Owner. A Broker acts as a 'middle-man' between the List Owner (customer) and the Service Provider. A Broker must not retain the file from the List Owner for more than 45 days and may receive updated addresses from the Service Provider for the purposes of delivering the same to the List Owner, but is never the final repository for the data. The only difference on how a PAF is completed for a List Administrator or a Broker is the sections that must be completed on the PAF. In all cases the PAF must identify the List Owner. More information about competing PAFs can be found on our RIBBS website at:

[https://ribbs.usps.gov/ncoalink/documents/tech\\_guides/PAF\\_GUIDE.PDF](https://ribbs.usps.gov/ncoalink/documents/tech_guides/PAF_GUIDE.PDF)

## **Ancillary Service Endorsements**

**Q11. Can a non-US mailer use a printed ancillary service endorsement to request address correction service and meet the Move Update standard?**

A11. Current requirements to receive address corrections based on a printed ancillary service endorsement state that a *domestic* return address must be present on the address side of the mail piece. If the return address on the mailpiece is a domestic address then a printed ancillary service endorsement can be used to meet the Move Update standard. If, however, the return address shows a non-domestic return address, then a printed ancillary service endorsement cannot be used because the USPS has no means to collect address correction fees from the foreign address.

## ACS™ / OneCode ACS®

**Q12. If I want to use ACS or OneCode ACS, can I get electronic address corrections if my place of business is in Canada?**

A12. ACS and OneCode ACS are dependent upon the mailer's request for Ancillary services and in many cases require a printed endorsement in addition to the service request embedded in the Intelligent Mail barcode. The same dependency on the domestic return address printed on the front of the mail piece would also apply to ACS and OneCode ACS mail. See the below Domestic Mail Manual reference for additional information on the requirement to use a domestic return address:

*DMM 602 1.5.3 Required Use of Return Addresses*

The sender's domestic return address must appear legibly on:

- a. Mail of any class, when its return and/or an address correction service is requested.

Fulfillment of ACS address change information may be retrieved electronically via a secure Internet site.

**Q13. We plan to use the Intelligent Mail Barcode on First-Class Mail to request OneCode ACS service and are not required to print an ancillary service endorsement on the mailpiece to request address correction service. Am I eligible to receive electronic address corrections even though my return address is not a domestic US address?**

A13. Even though the address correction request is carried only in the barcode, all mail requesting address correction services is required to bear a domestic US return address. The address correction service that is requested through the Intelligent Mail barcode will require the use of a domestic return address to be eligible to receive the address correction.

## NCOA<sup>Link</sup> MPE

**Q14. My company is a service bureau with a place of business in the United States that takes finished mailpieces from international mailers and combines them for entry into a US mail processing facility. Can I use NCOA<sup>Link</sup> MPE known as UMOVE to meet the Move Update standard?**

A14. Yes. NCOA<sup>Link</sup> MPE (Mail Processing Equipment) systems can be used to meet the Move Update standard. As with other change-of-address systems, these Move Update tools are only available for use by companies with business locations and legitimate return addresses in the United States. There is no restriction in the license that limits the Service Provider's ability to do processing for international entities that meet those conditions.