

QUESTIONS & ANSWERS

1. Can a Licensee function as both a Licensee and List Administrator for the same list.
 - a. Yes, in this case, the Licensee will sign both the middle & bottom Sections of the PAF.
2. Can a Licensee be a Broker?
 - a. Yes, Licensees can Broker to other Licensees (commonly – LSP to FSP), but a Licensee cannot Broker a list to themselves.
3. Can there be multiple Brokers?
 - a. Yes, there can be multiple Brokers for one list.
 - b. All Brokers in the chain must sign the PAF.
4. Who should sign the PAF?
 - a. The following people must sign the PAF
 - i. The Custodian of the list as the List Owner
 - ii. The Licensee
 - b. The following people only sign the PAF when applicable:
 - i. All Brokers
 - ii. The List Administrator
5. How is a PAF signed with multiple Brokers/list administrators?
 - a. The initial third party in the chain will sign the original PAF as the Broker.
 - b. Then the next third party will attach a second PAF (or just the bottom third of the page) write in the customer's name and fill in the address area with "SEE ATTACHED" and complete the bottom section. The CUSTOMER does not sign the additional forms.
 - c. Then the final Broker submits all PAFs to the Licensee.
 - d. The Licensee signs the original PAF and files all copies of the PAF together.
6. Can a list administrator or broker sign the PAF on behalf of their clients?
 - a. No, per the NCOA^{Link} Full and Limited Service Provider Licensee Performance Requirements (Section 9.3.1 and Section 8.3.1) This section states that "Under no circumstances shall a third party Broker, Agent, or List Administrator be considered the mailing list owner nor have the authority to sign on behalf of the Mailing List owner.
7. Does a company have to sign one PAF for each LIST?
 - a. "Yes" – if the LIST CUSTODIAN is not the same.
 - b. "No" – if the LIST CUSTODIAN is the same.
8. Can one PAF stand for all lists within a company?
 - a. Yes, if the LIST CUSTODIAN is the same for all lists.
9. How are multiple list IDs assigned to one PAF?

- a. By noting the PAF ID on the Front of the PAF as MULTIPLE, then listing the individual PAF IDs on the back of the PAF with the corresponding list name.
10. Can processing be done for a foreign company?
 - a. Yes, with prior approval from the USPS.
 11. Why must all Brokers and parties involved in the processing of the list sign as a List Owner, Broker or List Administrator?
 - a. To comply with provisions of the PRIVACY ACT of 1974. Specifically, data within the NCOA^{Link} Database is protected under this law. As custodians of the Data the Postal Service is required to maintain an accurate accounting of all disclosures of this data. So, data for any company/person who is handling a mailing list between the LICENSEE and LIST OWNER must be provided to the USPS to comply with this law. Failure to capture all data can result in the Termination of your license.
 12. How do I know if a customer is actually a Broker?
 - a. Ask questions of your customer. It is your responsibility to know all your customers.
 13. What will happen if I do not collect the appropriate PAF information?
 - a. Suspension to possible Termination
 14. What is a unique list?
 - a. As defined in Section 1 of the license agreement, a list, system, group or other collection of at least 100 unique names and addresses for addressing Deliverables for delivery by the United States Postal Service[®].
 - b. A table within a database
 - c. A list that is maintained separately from all other lists within a company
 - d. A unique list does not mean that a separate ID must be assigned every time a company submits a file. Each List should have a separate ID and should be handled accordingly.
 15. I am a Limited Service Provider and my customers file was processed using the NCOA^{Link} with ANK^{Link} dataset. The ANK^{Link} results from this file are less than 100 unique names and addresses. Can I submit this extract to a Full Service Provider for processing?
 - a. No, any processing requires at least 100 unique names and addresses.
 16. Can a BROKER be a LIST ADMINISTRATOR?
 - a. Yes, but not for the same PAF.
 17. Can there be multiple LIST OWNERS?
 - a. No, there is only one LIST OWNER
 18. Can the List Owner, Broker and/or List Administrator be the same?
 - a. These entities cannot be the same on a single PAF.

19. A Customer states that his business is a Sole Proprietorship and his Social Security Number (SSN) is used for the TIN. He does not want to give us this number, what should we do?
- This is the **ONLY** exception to the TIN rule, in this case collect the last 4 digits of his SSN
- The Tax Identification Number (TIN) has been removed from the PAF and is no longer required.**
20. My customer only wants to sign one PAF for Limited Service and Full Service processing?
- The Combined PAF can be used for this customer only if:
 - There are no other third parties (brokers or list administrators) involved.
 - The file will always be submitted to the same FSP listed on the PAF.
 - The Combined PAF cannot be used if:
 - There are multiple third parties involved.
 - The file will be going to different FSP Licensees.
 - Customer can sign a new PAF for the other FSP.
 - Customer can sign a new Combined PAF.
21. Can any mail house become a Mail Processing Agent?
- The scope of this PAF is to allow Full Service Provider Licensees the option provide list processing services to companies whose primary business is to prepare mail pieces to be deposited in the mail stream. This PAF is very restrictive in how the data is allowed to be used and does not allow for any information to be returned to the customer.
22. I am a Limited Service Provider Licensee and a mail house. My processes are similar to that of the Mail Processing Agent. Can I use this process to avoid having all of my customers sign a PAF?
- No, the purpose of this PAF is for FULL SERVICE PROVIDER processing only.
23. Is a PAF required for a Marketing Test?
- Yes.
24. Can a licensee sign a PAF when doing marketing tests for their customers?
- Yes, however the following requirements apply
 - Positions 1423-1452 in the Monthly Customer Service Log should be populated with the name of the entity (company name) for whom the processing completed.
 - The Licensee should only provide to that entity the processing summary report and other statistical information.
25. Is prior approval required for a US-based business that sends their address file to Canada for mail creation, printing and entry? The processor in Canada will submit the address file to an NCOA^{Link} Service Provider for Update.

- a. No. Since the company resides within the United States, no special permission is needed for your NCOA^{Link} Service Provider to process your list. It is important that you and your Canadian processor complete the Processing Acknowledgement Form (PAF) to show that, as the list owner, your place of business is within the United States.
26. What happens if we notify a client that their PAF is getting close to expiration and client does not respond? Does the PAF expire or do we assume there is no change and renew the PAF?
- a. The PAF will not expire. The licensee is to consider the PAF still current.
27. Is the new process an option, not a complete replacement for the existing process?
- a. That is correct.
28. Will all licensees have to migrate to the new process if they are still using the existing policy?
- a. No. Licensees may continue to use the existing annual renewal process if they wish.
29. Is there any intent to retire the old policy at some point in the future?
- a. At this time there is no intent to retire the existing policy.
30. So under this new policy, if the List Owner information has not changed, do we continue to use the original date that the List Owner signed the original PAF, or do we use the date they confirmed that their information is still current?
- a. The licensee should continue to use the date on the original PAF signed. If the software the licensee uses prohibits the licensee from processing without a renewal date, the licensee should use the date the verification notice was sent.
31. In the case where a Broker or List Administrator is involved, I am assuming that all parties will need to confirm their information, or is it only the List Owner that must confirm?
- a. Yes. All parties should confirm their information when Broker-Agents/List Administrators are involved. If there are any changes for any party, a new PAF is required.
32. Will there be a new PAF that has to be used to indicate they are using the Alternative Renewal PAF Policy?
- a. No. Licensees may continue to use the existing PAF forms.
33. How does the new PAF renewal process impact my PAF retention period?
- a. The requirement to maintain PAFs for a period 6 years still exists. However, the retention period is now a minimum of 6 years. Licensees should maintain PAFs for as long as necessary to cover all processing. For example:
 - i. Customer ABC signs a PAF on January 25, 2013.

- ii. Licensee contacts the customer annually in January and there are no changes until 2018 (5 years) when the customer submits a new PAF with new contact information and signature.
- iii. The licensee with then keep both PAFs until February 2024.

SCENARIOS

Multiple Customer Lists

Scenario 1

ABC Company has 3 mailing lists: 'Current Customers', 'Internal Marketing List' and 'Purchased Marketing Lists'.

John Smith, VP is the custodian of the Current Customer List and Fred Jones, VP is the custodian of both Marketing Lists.

ABC Company would sign two PAFs. John Smith would sign for the 'Current Customers'. Fred Jones would sign for 'Internal Marketing List' and 'Purchased Marketing Lists'. For the PAF signed by Fred Jones, the PAF ID on the front would be multiple and both PAF IDs would be listed on the back with the list name.

Scenario 2

ABC Company has 3 mailing lists: 'Current Customers', 'Internal Marketing List' and 'Purchased Marketing Lists.'

John Smith, VP is the custodian of all mailing lists stored in the company's data warehouse.

ABC Company would have one PAF signed by John Smith. The PAF ID on the front would be multiple and both PAF IDs would be listed on the back with the list name.

Acquisition of Customer by a third party

Scenario 3

ABC Company acquires XYZ Company. Both companies are customers of the same licensee. No new PAF would be required, processing for XYZ Company would then fall under ABC Company's PAF.

ABC Company acquires XYZ Company. XYZ Company has a business relationship with the licensee and ABC Company does not. A new PAF would be required for ABC Company.

Multiple Licensees

Scenario 4

ABC Company is an LSP. ABC runs all lists, for all customers through an FSP the first time, then run the lists internally to ABC for all future runs.

ABC Company should get two PAFs, one showing the FSP as a Licensee and ABC Company as the Broker or List Administrator. The second PAF shows ABC Company as the Licensee. The MULTIPLE Broker PAF rules may apply.

Broker Agent Processing

Scenario 5

Jones Hardware Co (Jones') goes to Fred's Mailing House (Fred's) for a mailing to their current customer database. Fred's then contacts Sue's Advertising Agency (Sue's) to design and create the mailpieces. As part of creating the mailpieces, Sue's submits the Jones' mailing list to an NCOA^{Link} Licensee. In this case Fred's Mailing House and Sue's Advertising agency are BOTH Brokers.

Jones' is the List Owner. Under no circumstances should a third party sign for the List Owner.

List Rentals

Scenario 6

ABC Company provides mailing services to its customers. Customers hire ABC Company to produce, print and mail for them on a regular basis. ABC Company purchases one or more lists from a list broker for unlimited use and uses these lists to mail the customer pieces. The same lists, or portions of the lists purchased by ABC Company are used for multiple Customers who want to mail to these areas. Customers 'never' see the list, never retain a copy of the list or receive any change of address information from ABC Company. ABC Company maintains, updates and manages these lists. Who is the List Owner and who is the Broker?

As ENTIRE list(s) are processed and no updated data is returned to the List Broker. Then ABC Company is the List Owner. There is no Broker. If a List is rented for a specific client/customer, that specific client/customer is the List Owner.

Scenario 7

ABC Company provides mailing services to its customers. Any Customer hires ABC Company to produce, print and mail for them on a regular basis. ABC Company purchases one or more lists from a list broker for a 'one-time' or multiple use to create and mail for a specific Customer. This Customer 'never' sees the list, never retains a copy of the list or retains any change of address information from ABC Company. Who is the List Owner and who is the Broker?

Since the list(s) purchase is for a specific customer, that customer is required to sign the PAF as the List Owner, ABC Company would be a Broker if they are not the licensee providing the processing. If a List is rented for a specific client/customer, that specific client/customer is the List Owner.

Scenario 8

ABC Licensee is an NCOA^{Link} Service Provider for a multiple chapters of a National Organization. Each chapter has a completed PAF on file to handle their in-house lists. Twice a year, ABC Licensee rents a number of lists to do prospect mailings for chapters participating in this program. Each chapter is contracted with us separately to handle this. The National Organization is not involved in this process. ABC Licensee will then rent 10 - 15 lists from a list broker. The rented lists are selected for based on the area for the chapters participating in the Prospect mailing. So 10 - 15 lists are rented for 30 - 40 chapters. ABC Licensee would like to process the rented lists through NCOA^{Link} upon receipt to have the most current address for merge-purge processing. The participating Chapters will *never* see the list, *never* retain a copy of the list or receive any change of address information from ABC Licensee. Does ABC Company have to split the files by Chapter for NCOA^{Link} Processing?

In this scenario, ABC licensee should split the rental lists based on the area covered by each chapter for NCOA^{Link} processing.

Cooperative Databases

Scenario 9

ABC Company houses a cooperative database for 100 companies. ABC Company wants to process this database through NCOA^{Link}. Each of the 100 companies would be required to sign a PAF for the licensee providing the NCOA^{Link} Service with ABC Company as the List Administrator. A single PAF ID may be used for all 100 PAFs

Scenario 10

XZ Licensee hosts and processes 'US Residential Co-Op Database' for 50 Customers. XZ Licensee is also a participant in this database. How should XZ Licensee Complete the PAFs for ALL 51 Participants of the 'US Residential Co-Op Database'.

For the 50 Participants other than XZ Licensee: XZ Licensee should appear as the Licensee and the List Administrator. The same or different parties at XZ Licensee would sign as Licensee and List Administrator. The signatures are dependent on who is responsible for the maintenance and account management

of the 'US Residential Co-Op Database' and who is authorized to sign PAFs as the Licensee representative.

For the PAF for XZ Licensee: XZ Licensee should appear as the licensee. There will be no List Administrator except in rare exceptions. An example of this would be when one division owns the data and a different division provides the hosting services.