

Move Update Verification Frequently Asked Questions

Q: Mailers have effectively 2 methods for updating their lists prior to the mailing; *FASTforward*® and NCOA^{Link}®. However, *FASTforward* only contains 13 months of change-of-address information and NCOA^{Link} contains 18 or 48 months of change-of-address information (depending on whether the Full Service or Limited version is used). It is very likely that a list contains a name-and-address that moved more than 13, 18, or 48 months ago, but was unable to be updated using these aforementioned compliance methods (particularly if the 18 months version of NCOA^{Link} is used). How will the USPS handle this if the Move Update Verification process is using 48 months of change-of-address information?

A: The Move Update verification process will report change-of-address (COA) matches by time periods that can be evaluated based on the Move Update product used by the mailer. For example, the process will indicate COA matches that, based on the latest date of either the Move-Effective-Date (MED) or the COA-Entry-Date (CED), were:

- Less than 95 days from the processing date
- Between 95 days and 13 months from the processing date
- Between 13 months and less than 18 months from the processing date
- Greater than 18 months from the processing date

Using the breakout of the elapsed time between either the MED or the CED compared to the Move Update product used by the mailer will provide the basis for evaluating mailer performance.

Q: Will MERLIN produce an accurate name and address record that can be matched to a COA considering issues such as nicknames, family versus individual moves, and other related nuances that affect accurate COA matching?

A: It is unlikely that there will be a discrepancy between the name and address read by MERLIN from the mailpiece and the actual name and address matched with NCOA^{Link}. Address matches to NCOA^{Link} are very conservative and require precision between the input name and address and the COA name and address. A more likely scenario is that there will be a discrepancy in the optical character reading and text conversion by MERLIN and the Move Update verification will fail to detect a valid move. Where the Move Update verification process identifies a COA match there is high confidence in the accuracy of the match.

Q: Does the Move Update verification process accommodate the Daily Delete File?

A: The USPS will ignore any matches detected where a Daily Delete transaction had occurred for the prior 95 days for the address. This exclusion of matches will eliminate any instances where a mailer had used NCOA^{Link} but failed to update an address record due to the existence of a Daily Delete transaction.

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Q: When multiple moves (address A to B and then B to C) occur, the USPS tries to “chain” all of the moves together so that the latest address is always returned. When they are able to do so, a single record connects A to C. Sometimes the USPS is not able to chain the moves, so there are two records in the NCOA database. The first processing of a record through NCOA will make the A to B change and the B to C change will occur during the next cycle of processing through NCOA. Assuming the Move Update verification process sees a mail piece between the two NCOA processing cycles, it may “fail” a piece for not yet having the C address.

A: The USPS acknowledges that there may be circumstances where a “broken chain” prevents a mailer from receiving the most current address for an individual. The most likely scenario envisioned is a case where:

Family move recorded from address	A	to	B	
Individual move recorded from address		B	to	C

If an address is presented, for example Jim Winston at Address A, then the first processing of NCOA^{Link} will move him based on a last name only match to Address B. Where MERLIN scans a mailpiece showing Jim Winston at Address B, the Move Update verification process will show that a move had occurred to Address C.

Assuming the original mailer address for Jim Winston at Address A was processed and updated in compliance with Move Update timeframes, the maximum age of the first COA match moving Jim Winston to Address B would be 190 days when processed by MERLIN. The expectation that a second COA moving Jim Winston to address C occurred immediately after the first COA was filed is considered low, although possible. To mitigate this potential the USPS will look at the potential to do a “Move-in” test of Jim Winston at Address B to determine if a recent move into Address B occurred within the past 95 days. If so, the COA match for Jim Winston from Address B to Address C will be disregarded and not reported.

Q: The USPS allows NCOA Link licensees to return as few as the most recent six months (based on Move Effective Date) of NCOA Link matches. Will the USPS consider a mailer that opts to apply only six months of COA data to their file to have complied with the Move Update Requirement?

A: The USPS will consider the mailer to have complied with Move Update that was based on the use of an NCOA^{Link} 6-month dataset only where the mailer:

- Previously updated the mailing list based on the 18-month NCOA^{Link} product prior to beginning use of the 6-month NCOA^{Link} database for ongoing maintenance, or has done continuous NCOA^{Link} processing based on a 6-month database for the past 12 months.
- Has an ongoing process that reprocesses the mailing list at the required 95 day intervals.
- Does not add address records to the mailing list that have not first been processed using the NCOA^{Link} 18-month database within 95 days of receipt of the address.

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Q: NCOA matches are possible only for “old side” addresses that bear an 11-digit ZIP Code. Consequently, an address that can be coded only to a 5-digit ZIP Code will never receive a match in NCOA despite the fact that a COA could exist and the 5-digit (non-DPV) address record is regularly processed through NCOA. There are a variety of scenarios (e.g., updates to the AMS database, AEC II corrections, street name corrections, etc.) that could result in the address being updated to a condition that allows it at a later date to successfully DPV and subsequently be matched to an NCOA record. The Move Update verification process may be able to find an NCOA hit that did not previously exist – until the mailer processes them through their next NCOA cycle.

A: This condition is possible but is considered to have a minimum negative impact. Within the COA data received from customers, approximately 6% of all old addresses are unable to be coded to a precise 11-digit ZIP+4 Code at time of COA entry. The majority (two-thirds of the 6%) of ZIP+4 code deficiencies are due to a lack of apartment info. Assuming a 5% typical match rate by NCOA^{Link}, the estimate of the potential of these address records being hit is 0.3% (three-tenths of 1 percent). In addition, the majority of all the changes that cause a non-coded old address to become ZIP+4 coded occur within the first 30 days of the COA entry. This means that any comparison with the mailer’s address by the Move Update verification would typically occur within 125 days of the MED and would not have a significant impact on the Move Update verification assessment.

Q: Back-dating of moves has been a reality since the advent of the NCOA and NCOA^{Link} master reference files. The paper USPS COA form when completed accepts any date provided by the postal patron. If the patron back-dates the move three months, by the time the move is entered and distributed to the NCOA product, it is four months old. So the first time the COA is available for NCOA^{Link} matching it is already outside the 95-day limit and could be flagged. The USPS reference files in addition to the move effective date should contain the date the COA was added to the file.

A: The USPS will factor the “backdated COAs” into the Move Update verification analysis by using either the Move-Effective-Date (MED) for COAs that are received in advance of the move date or the COA-Entry-Date (CED) for those COAs that arrive with a prior MED. This will minimize any impact on the assessment by the Move Update verification of the age of the COA when compared to the MERLIN processing date.

Q: Will the Move Update verification process use the same reference files and versions as the NCOA^{Link} providers? NCOA^{Link} files are full file replacements; it is our understanding the product fulfillment cycle takes two weeks to produce and distribute replacement files, which then have to be installed. Will the Move Update verification process have more current data than the NCOA providers?

A: The update of the NCOA^{Link} data will occur weekly on the last permissible date an NCOA^{Link} licensee can install an update per the Licensee Performance Requirements. We do not anticipate that the timing of NCOA^{Link} data refreshes will cause mailers to be impacted as the update of any address in the NCOA^{Link} data will fall within the 95 day Move Update performance window.

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Q: The Move Update requirements for Standard Mail apply to all automation, presort and carrier route pieces, including letters, flats, Not Flat-Machinables (NFMs), and parcels. How will the USPS verify move update compliance for NFMs, parcels, and even letters and flats that cannot be processed on MERLIN because they are non-machinable?

A: First-Class Mail (see similar instances through the next pages) and Standard Mail postage statements have been updated to provide mailers a section for mailers to identify the Move Update method used for a mailing. Mailers should check the box in this section for the method used to update their addresses. Mailers may be requested to furnish the appropriate documentation to demonstrate Move Update compliance.

Q: In many cases, businesses only accept “individual” change of addresses. For instance, financial institutions reject “family” move matches because they cannot legally move more than one account based upon this notification, especially if there is a separation, divorce or instance of fraud. How will MERLIN handle these situations?

A: A mailer’s choice to disregard certain address updates provided through Move Update products does not entitle the mailer to continue to claim postage discounts where the update of the address is a prerequisite to getting the discount. Within the Move Update verification of the address, addresses that have not been updated due to a mailer business practice will be identified, and the mailer will be required to document why these addresses have not been updated.

Q: There are situations where some businesses are provided with more current/recent address information from their customers than what the USPS may have: for instance, when businesses use a recent activity date to identify situations where they have a newer or changed address from their customer, or with P. O. Box moves. Some businesses may choose to only apply a percentage of the NCOA changes they obtain from the USPS because they have more recent data from their customer. How will the Move Update verification process handle these situations?

A: Addresses that have a COA on file that result in a match when evaluated through the Move Update verification processing will be reported for mailer documentation of why the address was not updated. If the mailer has information to show they have more current information than what is in the NCOA^{Link} data, then that information will be taken into consideration. The fact that NCOA^{Link} matches approximately 75% of the total population of COAs that may exist is not a basis for excluding any of the matches that NCOA^{Link} does produce. If a mailer is uncomfortable with the NCOA^{Link} processing results, the mailer should consider use of a different Move Update tool.

Q: There are some specific industry types and practices that present significant barriers to compliance with Move Update. For instance, some financial institutions cannot use NCOA or ACS because they cannot legally make address changes without customer authorization. These companies are authorized under current postal regulations to use alternative methods for move update. How will the USPS handle these companies/addresses if the Move Update verification process is the sole source for verification of move update compliance? Although some financial mailers may be “protected” by the restriction on changing an address without customer authorization, the restriction applies only to First-Class mailing of account information and does not apply to promotional and advertising mail.

A: The postage statements request mailers to identify the Move Update method they use and therefore the acceptance personnel know which mailers have received approval to comply with the Move Update standard through an alternate method. Where any request for Move Update documentation is made to justify the mailer’s claim of postage discounts, the mailer should refer the inquiry to the NCSC for resolution. A mailer that has allowance to use an alternative Move

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Update method for First-Class Mail can extend that allowance to Standard Mail when it involves the same address list covered by the allowance under First-Class mailing.

Q: There are addresses that will be “excused” even though MERLIN may identify them as non-compliant. How will the USPS handle these “exceptions” in the verification process? Will those addresses somehow be identified so that a clerk will know to excuse those from the acceptance test and error calculation for the mailing?

A: A mailer may be contacted to inquire about the method used to update their addresses. Mailers should communicate any exceptions when contacted. All Move Update verifications are subject to the appeal process that exists today for circumstances where a mailer disagrees with issues detected during mail acceptance.

Q: How do I meet Move Update requirements when mailing to an address recently added to my address list? The Move Update process is individual name-and-address-based, not “list-based.” When a customer contacts a business and as a result is added to the list, the newly added address can “ride” with the list until the next cycle for update. The address can be added to the list only if the customer has requested services or literature or has purchased merchandise.

A: The accommodation of “first time mailing” is not expected to raise an issue with evaluation of Move Update compliance as these addresses are expected to be current and not have an active change of address. In the event that these first time mailing addresses are not current, and there is an active COA, then it is typically expected they will not be in excess of the 95 day elapse between the MED and the mail entry date. In the event these first time mailing addresses do have a COA that was entered more than 95 days prior, then the USPS questions how these addresses are defined to be “newly acquired”. The USPS would recommend that mailers in doubt as to the currency of any address prior to mailing should use NCOA ^{Link} to “reset” the address currency for the purpose of mailing.

Q: The USPS has stated that the Move Update requirement is per name and address and not the list. They have further clarified that if an approved Move Update method has been applied to a name and address record within 95 days, then that record can be used on both First-Class Mail and Standard Mail mailings and be considered compliant with the Move Update rule. This also includes the clarification that a name and address sourced directly from the addressee is considered compliant with the Move Update rule for 95 days. How will the USPS take this into consideration as it implements a verification process using the Move Update verification process?

A: As long as an address that was qualified under one class of mail or by a different Move Update tool is mailed within 95 days of the use of the Move Update tool, it should not result in an issue.

Q: (New clients covered under PUB 363 p.10) The USPS has indicated these addresses do not need to be run through a Move Update process when first mailed, but that the mailer may need to identify the records if questioned by the USPS about Move Update. Would the addresses need to be run through a Move Update process before they are mailed again?

A: The above topic is considered to be similar to previous discussion of “newly acquired” and “first time mailing”. See response to these topics for additional information.

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Q: Do seed names need to be run through a Move Update process? Some say the USPS does not plan to require these addresses to be run through Move Update because they are usually a separate string of records to “known recipients” and less than 100 in the string, thus cannot legally be processed via NCOA^{Link}.

A: The assumption is that seed records will represent known persons at what is expected to be current addresses. As such, they are similar to “newly acquired” in that the seed address should represent what the mailer knows to be a current address. It is not anticipated that a seed address would typically raise a question of non-compliance with Move Update as the number of instances of moves associated with the seed addresses is expected to be low. If a mailer is not actively maintaining the seed addresses then it is recommended they include the exceptional address format of “Or Current Resident” to avoid issues with Move Update compliance.

Q: Can NCOA^{Link}-identified moves with a move effective date older than the mailer’s last activity date or recency date be rejected? The USPS has indicated these can be rejected, but mailers will need to document these in case they are questioned by the USPS as not meeting the Move-Update requirement. How detailed and specific this documentation needs to be is not known at this time?

A: See response to “Situations Where Businesses Have More Current Data” previously answered.

Q: How should mailers document compliance and assign postage liability for non-compliance when the mailing is presented by a mailing agent (today accomplished with PS Forms 3602 and 6014)? What documentation will mailers need to prove compliance with Move Update in the future, and to assign liability for postage adjustment in cases of non-compliance where the mail is presented by a mailing agent?

A: Reference the ‘Mailer Advisement Policy’ document for a description of the documents and processes that can be used to substantiate Move Update compliance. The ultimate burden for maintenance of documentation for any postage discount claimed is the mailers. Refer to DMM 234.4.7 for additional information on provision of additional documentation.

Q: What are the error tolerances for non-compliance with Move Update for a mailing, and how will they be applied? What are the postage adjustment consequences, and how will those be communicated to the customer and applied to the customer?

A: The USPS will evaluate results of the new Move Update verification to arrive at a fair tolerance. The USPS believes that mailers that undertake a good-faith effort to comply with the Move Update standard will not have to be concerned about what the eventual error tolerance may be as the mailer’s address list will be current and thus not require evaluation per the error tolerance.

Q: Is a PS Form 6014 required to be presented at the time of mailing? What is the role of the Service Provider versus the Mail Owner with regards to the 6014?

A: PS Form 6014 is not required to be presented at the time of mailing. The purpose of the PS Form 6014 is to establish who, between a mail owner and the service provider presenting mail on behalf of the mail owner, takes responsibility for having performed the Move Update processing.

Assume a service provider is presenting mail on behalf of a mail owner and the service provider signs the postage statement. If the mail owner has already performed the required Move Update processing, then the service provider may obtain the PS Form 6014 from the mail owner and retain it in the mailing job jacket. The 6014 may be provided if the USPS asks for documentation demonstrating when Move Update processing was performed. If a service provider has an

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ongoing relationship with a mail owner to accept and present mailings then a single PS Form 6014 can be completed and remain valid for up to one year as long as the mailer owner does not change the method for Move Update compliance where indicated on the PS Form 6014. The service provider may be asked to contact the mailer owner to assist the USPS with investigation of the Move Update method used by the mail owner.

If the Move Update verification for a mailing results in a score below the acceptable threshold, the mailing will be assessed additional postage at the time of mailing, or the mailer may choose to have the mailing returned, as is the case with any other verification failure. For Standard Mail, additional postage will be assessed for mailings that fall below the acceptable threshold after the transition period. Presenting a 6014 for a mailing that falls below the acceptable threshold will not be adequate evidence to negate the Move Update verifications findings.