



607 Mailer Compliance and Appeals of Classification Decisions

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1.0 Mailer Compliance With Mailing Standards

1.1 Mailer Responsibility

A mailer must comply with all applicable postal standards. Despite any statement in this document or by any USPS employee, the burden rests with the mailer to comply with the laws and standards governing domestic mail. For mailings that require a postage statement, the mailer certifies compliance with all applicable Postal Service standards with electronic confirmation during eDoc submission. Questions on mail classification and special mail services may be directed to local USPS representatives (e.g., business mail entry managers). The Pricing and Classification Service Center (PCSC) can help local Post Offices answer customer questions on mailing standards (see [608.8.4](#) for address or telephone number).

1.2 Postage Payment

A permit imprint, bulk, or other discount price mailing is accepted after an examination of the mailing and the accompanying postage statement prepared by the mailer. A USPS employee's acceptance of the postage statement and the subsequent acceptance of the mailing does not constitute verified accuracy of that statement and does not limit the ability of USPS to demand proper payment after acceptance when it becomes apparent such payment was not made.

1.3 Request for Exception to Standards

To the extent that postage prices, fees for mail services, and basic mail classification and eligibility are prescribed by federal statute or the Domestic Mail Classification Schedule, the USPS is not authorized to waive or except the corresponding DMM standards. Postmasters or managers at Post Offices, district or area offices, and other field facilities may not suspend or grant any waiver or exception to standards established by the USPS (e.g., regarding mail preparation) unless *specifically* authorized by the DMM. Any mailer's request for an exception to DMM standards must be referred to the PCSC (see [608.8.4](#) for address and telephone number).



2.0 Rulings on Mailing Standards

2.1 Local Decision

A mailer who disagrees with a classification decision by a local Post Office, whether on a pending or a proposed mailing, may send a written appeal to the postmaster within 30 days. The appeal is forwarded to the Pricing and Classification Service Center (PCSC). The PCSC issues the final agency decision. Only the PCSC manager may rule on an appeal or initial request for a ruling on an exception to a USPS standard in the DMM.

2.2 Expedited Oral Decision

A mailer who receives an adverse ruling from a Post Office, whether on a pending or a proposed mailing, may ask the PCSC manager to provide an expedited oral decision on appeal. This request for an expedited appeal may be made by telephone. The PCSC manager will determine whether the appeal or individual questions in the appeal can be decided on an expedited basis and, if so, will advise the mailer of the determination and confirm it in writing.

2.3 Classification While Appeal Pending

Pending resolution of an appeal, the mailer may, by a letter to the local postmaster, request to mail under a deposit arrangement. The mailer must deposit with the postmaster enough funds to cover postage at the higher price. If the appeal is upheld, the difference between the amount deposited and a lower price determined to be appropriate is returned to the mailer. If the appeal is denied, the deposit is not returned. If a balance remains in the deposit after the higher price postage is deducted, the balance is refunded at the mailer's request.

2.4 Decisions on National Rulings

The manager, National Customer Rulings makes mail preparation, mailpiece design, and price eligibility decisions for customers in strategic industries as appropriate. Any mail classification decision made initially by the manager, National Customer Rulings may be appealed within 15 days to the manager, Pricing and Classification Service Center, who will issue the final agency decision.

2.5 PCSC Decision

Any mail classification decision made initially by the PCSC manager may be appealed within 15 days to the manager, Product Classification (see [608.8.0](#) for address), who has sole authority to render a decision on such appeals.

2.6 Corresponding Standards

Rulings and appeals concerning revenue deficiencies (on past mailings), refunds, or applications for various mailing privileges, prices, or authorizations, are subject to the corresponding standards.



3.0 Revenue Deficiency

3.1 General Information

3.1.1 Revenue Deficiency Process

The revenue deficiency process outlined in [3.1](#) is an administrative process that supplements and does not diminish any rights the Postal Service has to recover revenue deficiencies through other legally available methods, such as when the deficiency arises as a result of fraud, misrepresentation, or the misuse of PC Postage products or other Postage Evidencing Systems.

3.1.2 Definitions

Revenue deficiency definitions are as follows:

- a. *Revenue deficiency:* A shortage or underpayment of postage or fees that has been calculated and assessed to a mailer. Unless assessed under other applicable postal regulations, revenue deficiencies are generally assessed as provided herein by the postmaster; manager, Business Mail Entry; the program manager, Revenue and Compliance, or other postal official, who issues a written notification to the mailer citing the amount of the deficiency and the circumstances.
- b. *Mailer:* A mailer is defined as the mail owner or an individual or entity that prepares or presents a mailing to the Postal Service and includes those who allow others to use a postage meter or PC postage product (collectively “postage evidence system” — see [604.4.1.1](#) and [604.4.1.2](#)) that has been authorized for use by the individual or entity.

3.1.3 Assessments

Postal officials review mailings, postage statements, and other relevant documentation to assess revenue deficiency. Mailers are required to cooperate and provide any documentation or information requested by postal officials during the review and assessment process. A mailer’s failure to provide requested documentation or information during a review may result in a negative inference concerning the documentation or information requested.

3.1.4 Assessed Revenue Deficiencies

Assessed revenue deficiencies may be subject to the following:

- a. If a mailer fails to tender payment to the Postal Service within 30 days of receipt of a final agency decision, fails to comply with the terms or conditions of a payment plan agreed to by the Postal Service concerning the final agency decision, or is suspected by the Postal Service of continuing to repeatedly short pay postage, the Postal Service may:
 - 1. Deduct any deficiencies from the mailer’s trust account (or any other funds in USPS possession) incurred within 12 months of the date of the final mailing on which the deficiency was assessed.
 - 2. Initiate debt collection procedures.



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3. Restrict or suspend discounted mailing privileges with the concurrence of the manager, Revenue Assurance and Vice President Controller, or as otherwise allowed by regulation, or in accordance with any agreement with the mailer.
- b. Discounted mailing privileges may be suspended or restricted regardless of payment status of an assessed revenue deficiency if underpayment of postage continues after a mailer has been assessed a revenue deficiency.
- c. Interest on assessed revenue deficiencies will accrue at a rate of 6 percent per annum beginning 30 days after the receipt of the final agency decision and will continue until the debt is paid.
- d. Other fees and costs related to an assessed revenue deficiency may be collected as allowed by law or regulation.

3.2 Appeal of Ruling

3.2.1 General Decision

Except as provided in [604.4.4.4](#) through [604.4.4.5](#), [607.3.2.2](#), and [703.1.0](#), a mailer may appeal a revenue deficiency assessment by sending a written appeal to the postmaster or manager in [3.2.1a](#) through [3.2.1c](#) within 30 days of receipt of the notification. In all cases, the mailer may be asked to provide more information or documentation to support the appeal. Failure to do so within 30 days of the request is grounds for denying an appeal. Any decision that is not appealed as prescribed becomes the final agency decision. Mailers may send appeals as follows:

- a. To the district manager, Finance, for revenue deficiencies for fees. The district manager, Finance, issues the final USPS decision.
- b. To the postmaster, manager, Business Mail Entry, program manager, Revenue and Compliance, or other postal official, for revenue deficiencies for postage. The appeal is then forwarded to the manager, Pricing and Classification Service Center (PCSC), who issues the final agency decision.
- c. To the manager, Product Classification (see [608.8.0](#) for address), if the PCSC manager first assessed the deficiency. The manager, Product Classification issues the final agency decision.



3.2.2 Nonprofit USPS Marketing Mail Decision

Nonprofit mailers have two levels of appeal. They may appeal revenue deficiency assessments as follows:

IF THE INITIAL REVENUE DEFICIENCY ASSESSMENT WAS MADE BY:	FIRST-LEVEL APPEAL	SECOND-LEVEL APPEAL AND FINAL USPS DECISION
postmaster; manager, Business Mail Entry; manager, Revenue and Compliance; or other Postal Service official	manager, PCSC (see 608.8.0 for address)	manager, Product Classification (see 608.8.0 for address)

All appeals must be submitted in writing within 30 days of the previous USPS decision. Any decision that is not appealed as prescribed becomes the final agency decision; no appeals are available within USPS beyond the second appeal.

