

**A GUIDE TO NCOA<sup>Link™</sup>  
PROCESSING  
ACKNOWLEDGEMENT FORMS  
(PAFs)**

**United States Postal Service®  
National Customer Support Center (NCSC)  
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# Processing Acknowledgement Form (PAF) Requirements and Clarifications

## DEFINITIONS

- **Licensee**
  - Has a signed license agreement with the Postal Service™
  - Receives files from customers for NCOA<sup>Link™</sup> processing
  - Performs the actual processing of the LIST against the NCOA<sup>Link</sup> database
  - Responsibilities:
    - Adhering to the License Agreement and Performance Requirements
    - Collecting and maintaining all PAFs
    - Policing the Advertising of all BROKERS and LIST ADMINISTRATORS with which they have a business relationship
  
- **List Owner**
  - Person/Company for whom processing will be done
  - Usually the owner of the mail created from this list
  - Is the beneficiary of the NCOA<sup>Link</sup> processing
  
- **Broker/Agent**
  - Acts as a 'middle-man' between the customer and licensee
  - Is a 'reseller' for the licensee's service
  - Must not retain the file more than 45 days
  - May receive updated addresses from the licensee for the purposes of delivering the same to the list owner, but is never the final repository for the data
  
- **List Administrator**
  - Houses, maintains, updates and 'baby-sits' the list for the list owner
  - Has a contract to provide the above services to the customer
  
- **List Custodian**
  - Any responsible party/officer in a company (LIST OWNER) who is responsible for an address list within that company

- **PAF ID**

- A four-part 18 byte list/company identification scheme:
  - Bytes 1-4 are the PLATFORM ID of the licensee
  - Bytes 5-10 are the NAICS code for the List Owner
  - Bytes 11-12 are the approximate frequency of processing on an annual basis (usually 01-52 or 99)
  - Bytes 13-18 are the UNIQUE ID to that list assigned by the licensee

- **Broker or List Administrator ID**

- A three-part 16 byte company identification scheme:
  - Bytes 1-4 are the PLATFORM ID of the licensee
  - Bytes 5-10 are the NAICS code for the List Owner
  - Bytes 11-16 are the UNIQUE ID to that company assigned by the licensee

## **GENERAL GUIDELINES**

- There can only be one List Administrator per PAF.
- Licensees can broker to other licensees (commonly LSP to FSP).
- There can be multiple Brokers for a list and all Brokers must sign the PAF.
  - a. All Brokers must sign the PAF.
  - b. The broker closest to the licensee in the transaction will sign the original PAF as the broker.
  - c. Additional brokering parties will each attach an additional PAF, write in the customer's name, fill in the address area with the words "SEE ATTACHED" and complete the bottom section.
  - d. The CUSTOMER does not sign the additional forms.
  - e. The licensee signs the original PAF and files all copies of the PAF together.
- The PAF must be signed by
  - Always:
    - List Owner
    - Licensee
  - When applicable:
    - Broker(s)
    - List Administrator
- PAFs must be collected to comply with the PRIVACY ACT of 1974.
- There is only one list owner for a PAF.
- There is only one licensee for a PAF.

- The List Owner cannot be the Broker for the same list.
- The List Owner cannot be the List Administrator for the same list.
- The Broker cannot be the List Administrator for the same list.

## Q&A

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. 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.
7. Can one PAF stand for all lists within a company?
  - a. Yes, if the LIST CUSTODIAN is the same for all lists.
8. 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.
9. If processing for a foreign company, what should be used for the NAICS code?

- a. Look up the appropriate NAICS code by industry.
10. 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<sup>Link</sup> 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 handling a mailing list between the LICENCEE 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.
11. 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.
12. What will happen if I do not collect the appropriate PAF information?
  - a. Suspension to possible Termination
13. 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<sup>®</sup>.
  - b. A table within a database
  - c. A list that is maintained separately from all other lists within a company
  - d. A unique set of names and addresses as defined in se
14. Can a BROKER be a LIST ADMINISTRATOR?
  - a. Yes, but not for the same PAF.
15. Can there be multiple LIST OWNERS?
  - a. No, there is only one LIST OWNER
16. Can the List Owner, Broker and/or List Administrator be the same?
  - a. These entities cannot be the same on a PAF.

## SCENARIOS

### 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.

## **Scenario 3**

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 list service company. The second PAF shows ABC Company as the licensee. The MULTIPLE broker PAF rules may apply.

## **Scenario 4**

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<sup>Link</sup> Licensee. In this case Fred's Mailing House and Sue's Advertising agency are BOTH brokers.