

EXHIBIT F

ADDRESSING & GEOSPATIAL TECHNOLOGY
NATIONAL CUSTOMER SUPPORT CENTER



April 19, 2021

Ms. Marie P. Patino
Journalist
Bloomberg LP
1101 New York Avenue Northwest Floor 9A
Washington, DC 2005-4269
VIA Email: mpatino14@bloomberg.net

RE: FOIA Case No. 2021-FPRO-01469

Dear Ms. Patino:

Your Freedom of Information Act (FOIA) requests for information from the United States Postal Service® has been forwarded to my office for response. Your request sought the following:

Change-of-address (COA) data of December 2020, aggregated by ZIP Code. Data to include origin/destination information.

Information is maintained in the United States Postal Service change-of-address system for a maximum of four (4) years from the date a customer indicates on their change-of-address order to begin mail forwarding. After the four-year retention period, the change-of-address information is permanently deleted from the change-of-address system and no longer available for inquiry.

Based on your description of records sought, it has been determined that the records you seek are exempt from disclosure under FOIA Exemption 3, 39 U.S.C. §410(c)(2).

Exemption 3 allows an agency to withhold information that is "specifically exempted from disclosure by statute." 5 U.S.C. § 552(b)(3). Section 410(c)(2) of the Postal Reorganization Act qualifies as an Exemption 3 statute. 39 U.S.C. § 410(c)(2). Section 410(c)(2) permits the Postal Service to withhold "information of a commercial nature, including trade secrets, whether or not obtained from a person outside the Postal Service, which under good business practice would not be publicly disclosed." 39 U.S.C. § 410(c)(2). Information of a commercial nature under Section 410(c)(2) is broadly defined to include all information that "relates to commerce, trade, profit, or the Postal Service's ability to conduct itself in a businesslike manner." 39 C.F.R. § 265.14(b)(3). In determining whether information is commercial in nature, the Postal Service considers six (6) factors relating to whether the information is more akin to its role as a business entity, a competitor in the market or a provider of basic public services. See 39 C.F.R. § 265.14(b)(3)(i). In addition, the Postal Service has identified an extensive, though not exhaustive, list of information that is commercial in nature and thus, exempt from disclosure under Section 410(c)(2). See 39 C.F.R. § 265.14(b)(3)(ii).

Here, we find that the records you requested qualifies as "information of a commercial nature" under Section 410(c)(2) because the information is related to change-of-address counts which provides information that is under development for a commercial product. Accordingly, this information is exempt from disclosure under Exemption 3 of the FOIA and Section 410(c)(2).

As information, we do have change-of-address data for the last four years on our FOIA website, which can be found at <https://about.usps.com/who/legal/foia/welcome.htm>.

If you are not satisfied with the response to this request, you may file an administrative appeal within 90 days of the date of this response letter by writing to the General Counsel, U.S. Postal Service, 475 L'Enfant Plaza SW, Washington, DC 20260 or *via* email at FOIAAppeal@usps.gov. Your appeal must be postmarked or electronically transmitted within 90 days of the date of the response to your request. The letter of appeal should include, as applicable:

- (1) A copy of the request, of any notification of denial or other action, and of any other related correspondence;
- (2) The FOIA tracking number assigned to the request;
- (3) A statement of the action, or failure to act, from which the appeal is taken;
- (4) A statement identifying the specific redactions to responsive records that the requester is challenging;
- (5) A statement of the relief sought; and
- (6) A statement of the reasons why the requester believes the action or failure to act is erroneous.

For further assistance and to discuss any aspect of your request, you may contact any of the following:

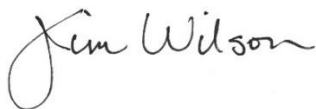
Michelle Evans
Addressing & Geospatial Technology
United States Postal Service
225 North Humphreys Boulevard Suite 501
Memphis, TN 38188-1001
Phone: 901-681-4474

Privacy & Records Office
United States Postal Service
475 L'Enfant Plaza Southwest Room 1P830
Washington, DC 20260-1101
Phone: 202-268-2608
Fax: 202-268-5353
FOIA Public Liaison: Nancy Chavannes-Battle

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road-OGIS
College Park, MD 20740-6001
Email: ogis@nara.gov
Telephone: 202-741-5770
Toll free: 1-877-684-6448
Facsimile: 202-741-5769

Sincerely,



James D. Wilson
Director, Addressing and Geospatial Technology

cc: Records Office