BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
	)	
Cable Subscribership Survey	)	MB Docket No. 07-269
for the Collection of Information	)	
Pursuant to Section 612(g) of the	)	
Communications Act	)	
	)	
	)	

To: The Secretary's Office
Attn: Chief, Media Bureau

COMMENTS OF BUCKEYE CABLEVISION, INC., HARRON COMMUNICATIONS, L.P., MIDCONTINENT COMMUNICATIONS, SERVICE ELECTRIC CABLE TV, INC., SERVICE ELECTRIC CABLEVISION, INC., US CABLE CORPORATION, AND WESTERN BROADBAND, LLC

Buckeye Cablevision, Inc.
Harron Communications, L.P.
Midcontinent Communications
Service Electric Cable TV, Inc.
Service Electric Cablevision, Inc.
US Cable Corporation
Western Broadband, LLC

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SUMMARY

Buckeye Cablevision, Inc., Harron Communications, L.P., Midcontinent Communications, Service Electric Cable TV, Inc., Service Electric Cablevision, Inc., US Cable Corporation and Western Broadband, LLC (collectively, the "Joint Cable Commenters") urge the Commission to reconsider certain of the information requests in the proposed Cable Subscribership Survey (the "Survey Form") because such information is neither maintained nor accessible to cable operators. To the extent much of the data responsive to the proposed Survey Form is available, it would be of such demonstrably limited accuracy that the quality, utility, and integrity of the results would be insufficient to justify reliance on the data or the conclusions drawn from them. Moreover, as the Commission's annual video competition reports demonstrate, the diversity of information sources available to cable subscribers today is greater than ever before while the percentage of programmers vertically integrated with cable operators is at an all-time low. Therefore, no additional leased access rules are justifiable under Section 612(g) of the Communications Act regardless of whether its seventy percent cable penetration test has been met. Under these circumstances, the Joint Cable Commenters submit that the Commission's limited resources need not be diverted to an investigation that will be unduly burdensome and unreliable in its present form.

Most of the information requested in the proposed Survey Form is problematic because cable operators do not maintain their business records in a manner that would allow them to accurately provide it to the Commission. For example, cable operators do not maintain or have access to reliable current or historical information regarding the unoccupied or seasonal use of housing units passed by their systems. In addition, the proposed collection and tabulation of data on a zip code basis introduces substantial potential for error and inaccuracy. Zip codes represent post offices and postal delivery routes rather than precise geographies, and the imprecise geographic areas to which they correspond are routinely adjusted without notice for mail delivery purposes. Moreover, more current and reliable census data regarding unoccupied and seasonal housing will not be available until the 2010 census, and the association of operator

business or engineering records with commercially available zip code geographies would be prohibitively complex, expensive, and unreliable.

Because the proposed Survey Form would collect fundamentally unreliable data to make an unnecessary determination, the Commission should either reconsider the information requested in it or decline to conduct this burdensome exercise altogether.

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Buckeye Cablevision, Inc. ("Buckeye"), Harron Communications, L.P. ("Harron"), Midcontinent Communications ("Midcontinent"), Service Electric Cable TV, Inc. ("Service Electric Cable TV"), Service Electric Cablevision, Inc. ("Service Electric Cablevision"), US Cable Corporation ("US Cable"), and Western Broadband, LLC ("Western Broadband") (collectively, the "Joint Cable Commenters") hereby submit these Comments in response to the Federal Communications Commission ("FCC" or the "Commission") Public Notice regarding its proposed Cable Subscribership Survey Form (the "Survey Form").[1]

The purpose of the Survey Form is to assist the Commission in determining whether the seventy percent cable television penetration rate established in Section 612(g) of the

[1] Public Notice, *Media Bureau Seeks Comment on a Cable Subscribership Survey for the Collection of Information Pursuant to Section 612(g) of the Communications Act*, DA 09-44, __ FCC Rcd __ (rel. Jan. 16, 2009) ("*Survey Form Public Notice*").

Communications Act (the "Act"),[2] which governs commercial leased access obligations, has been met. The Joint Cable Commenters would be pleased to assist the Commission by providing available relevant and accurate data necessary for the Commission to fulfill its statutory responsibilities. Much of the information requested in the proposed Survey Form, however, is neither maintained by nor accessible to cable operators, or is inapposite to a determination under Section 612(g). The Joint Cable Commenters consequently are concerned that most of the information collected through the Survey Form, to the extent it is even available, will be of insufficient quality to justify the substantial burden imposed on cable operators in collecting it and will fail to assist the Commission in making an accurate determination under Section 612(g). The Joint Cable Commenters therefore recommend that the Commission reconsider the information requested in the Survey Form as discussed below and defer examination of occupied household information, if necessary, until the Census Bureau gathers reliable data next year in the decennial census.

INTRODUCTION AND BACKGROUND

Buckeye serves approximately 150,000 multichannel video customers in northwestern Ohio and southeastern Michigan. Harron serves approximately 189,000 such customers in various Connecticut, Maine, Maryland, Mississippi, New Hampshire, Pennsylvania, and Virginia cable systems. Midcontinent serves approximately 275,000 such customers in various Minnesota, North Dakota, and South Dakota cable systems. Service Electric Cable TV serves approximately 101,000 such customers in various Pennsylvania and New Jersey cable systems. Service Electric Cablevision serves approximately 86,000 such customers in various Pennsylvania cable systems. US Cable serves approximately 83,000 such customers in various Colorado, Minnesota, Missouri, New Jersey, New Mexico, Texas, and Wisconsin cable systems. Western Broadband serves approximately 10,000 such customers in various Arizona cable systems.

[2] 47 U.S.C. § 532(g).

The Joint Cable Commenters operate their systems pursuant to state and local franchise agreements and generally maintain their subscriber information on that basis to satisfy reporting requirements in those agreements. Although their subscriber databases contain some zip code information regarding their existing and potential customers for billing and system engineering purposes, the Joint Cable Commenters have no method for determining the number of occupied, unoccupied, or seasonal homes in either their franchise areas, system areas, or the postal delivery routes (*i.e.*, zip codes) serving those areas. Moreover, they have no reliable methodology for updating their databases to reflect unannounced changes that the United States Postal Service ("USPS") routinely makes to zip code routes or for new or retired zip codes (*i.e.*, post offices) that USPS creates or terminates for purposes of efficient mail delivery. The only reliable information regarding occupied, unoccupied, and seasonal households of which the Joint Cable Commenters are aware is that compiled in the decennial census, which will occur next year. Even the Census Bureau, however, does not collect such information by the postal zip code routes requested in the Survey Form, and which are reflected in cable operators' customer billing databases. Instead, as explained in greater detail below, the Census Bureau uses Zip Code Tabulation Areas ("ZTCAs"), which are incongruous both with actual zip code delivery routes and with cable franchise and cable system geographies.

On November 27, 2007, the Commission adopted the *Thirteenth Annual Report* in its Annual Assessment of the Status of Competition in the Market for Delivery of Video Programming (the "*Thirteenth Annual Report*").[3] Fourteen months later, on January 16, 2009 — the final business day of former Chairman Martin's term in office — the Commission released the *Thirteenth Annual Report*. The Commission concluded that it could not determine, based on available evidence, whether the second prong of the test set forth in Section 612(g) of the Act[4]

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[3] Annual Assessment of the Status of Competition in the Market for Delivery of Video Programming, *Thirteenth Annual Report*, __ FCC Rcd __ (adopted Nov. 27, 2007; rel. Jan. 16, 2009).

[4] 47 U.S.C. § 532(g). Section 612(g) provides that:

(*continued . . .*)

had been met; *i.e.*, whether cable operators provided video service seventy percent of the households their systems "passed." The Commission therefore announced the "only way to accurately conclude that the 70/70 test has been met" was to conduct a survey requesting detailed homes-passed and penetration information from every cable operator.[5] On January 16, 2009, the Commission also released a Public Notice requesting comment on the proposed Survey Form.[6] As discussed below, however, the Commission's annual video competition reports demonstrate that the diversity of information sources available to cable subscribers today is greater than ever before while the percentage of programmers vertically integrated with cable operators is at an all-time low. Given these facts, the Joint Cable Commenters submit that no additional leased access rules are justifiable under Section 612(g). The Joint Cable Commenters nevertheless submit the following comments regarding the proposed Survey Form.

(. . . *continued*)

> Notwithstanding sections 621(c) and 623(a), at such time as cable systems with 36 or more activated channels are available to 70 percent of households within the United States and are subscribed to by 70 percent of the households to which such systems are available, the Commission may promulgate any additional rules necessary to provide diversity of information sources. Any rules promulgated by the Commission pursuant to this subsection shall not preempt authority expressly granted to franchising authorities under this title.

[5] *Thirteenth Annual Report* at para. 41-43. The Commission indicated it would collect the following information: "1. Total number of homes the cable operator currently passes; 2. Total number of homes the cable operator currently passes with 36 or more activated channels; 3. Total number of actual subscribers, including all subscribers in MDUs; and 4. Total number of subscribers with 36 or more activated channels." *Id.* at para. 43.

[6] *Survey Form Public Notice*, DA 09-44. Because the proposed survey constitutes an information collection under the 1995 Paperwork Reduction Act, Pub. L. No. 104-13, 109 Stat. 163 (1995), the Office of Management and Budget ("OMB") must approve both the final Survey Form and the underlying information collection before cable operators may be required to respond to it. *See* Notice of Public Information Collection Being Reviewed by the Federal Communications Commission, Comments Requested, 74 Fed. Reg. 4437 (Jan. 26, 2009) (requesting comment on, among other topics, whether the proposed information collection is necessary and whether the Commission's estimate of two hours to complete the Survey Form is accurate); *see Survey Form Public Notice* at note 3.

DISCUSSION

I. Congress Explicitly Limited Section 612 Of The Act To Leased Commercial Access Of Video Channels On Cable Television Systems.

To the extent that certain portions of the Survey Form may be interpreted to seek information regarding non-video services[7] or that the Commission is urged to adopt rules covering non-leased access or non-video services pursuant to Section 612(g), the Joint Cable Commenters observe that Congress explicitly limited Section 612 generally, and Section 612(g) specifically, to consideration of video services provided on cable television channels leased to programmers unaffiliated with the relevant cable operator. The Commission, therefore, should clarify that the Survey Form is neither seeking nor considering information or requirements concerning non-video (*e.g*, high-speed data or telephony) services or customers.

Congressional intent to limit the scope of Section 612 is reflected both in the plain language of the statute and its legislative history. In Section 612(a) of the Act, Congress explained that:

> The purpose of [commercial leased access] is to promote competition in the delivery of diverse sources of video programming and to assure that the widest possible diversity of information sources are made available to the public from cable systems in a manner consistent with growth and development of cable systems.[8]

The House Report[9] accompanying the 1984 Cable Act[10] similarly reflects congressional intent to limit the scope of Section 612 to video programming and unaffiliated leased access programming providers. For example, in explaining the leased commercial use set aside in Section 612(b)(4),[11] the House Report states that "'commercial use' means the provision of video

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[7] *See* Survey Form Questions 5.b. and 5.c.; *Survey Form Public Notice* at 9; *see also infra* Section II.C.

[8] 47 U.S.C. § 532(a).

[9] H.R. REP. NO. 98-934, *reprinted in* 1984 U.S.C.C.A.N. 4655 (the "House Report").

[10] Cable Communications Policy Act of 1984, Pub. L. No. 98-549, 98 Stat. 2779 (1984) (the "1984 Cable Act").

[11] 47 U.S.C. § 532(b).

programming" regardless of the profit or nonprofit status of the programming provider.[12] The House Report, moreover, repeatedly stresses that the "overriding goal in adopting [Section 612] is divorcing cable operator editorial control over a limited number of channels"[13] and that "[t]he overall purpose of [Section 612] is to prohibit any editorial control by the cable operator over the selection of programming provided over channels designated for commercial leased access."[14]

With regard to Section 612(g) specifically, Congress explained that its purpose was limited to "provid[ing] a mechanism to assure there is adequate flexibility to develop new rules and procedures with respect to the use of leased access channels as the cable industry develops and serves more citizens in the future."[15] Therefore, once both the seventy percent thresholds set forth in Section 612(g) are met, Congress granted the Commission limited authority

> to promulgate any additional rules necessary to assure that leased access channels provide as wide as possible a diversity of information sources to the public. Along these lines, the Commission may develop additional procedures for the resolution of disputes between cable operators and unaffiliated programmers, and may provide rules or new standards for the establishment of rates, terms and conditions of access for such programmers.[16]

Thus, in Section 612(g), Congress granted the Commission conditional and limited authority to promulgate additional commercial leased access rules once the cable industry reached a certain size and market share if such rules were "necessary to provide diversity of information sources."[17] As demonstrated below, however, the Commission's annual video competition reports and recent events demonstrate conclusively that the explosion of diverse programming sources and the corresponding decline in the percentage of vertically integrated

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[12] House Report at 48, 1984 U.S.C.C.A.N. at 4685.
[13] *Id.* at 50, 1984 U.S.C.C.A.N. at 4687.
[14] *Id.* at 51, 1984 U.S.C.C.A.N. at 4688.
[15] *Id.* at 54, 1984 U.S.C.C.A.N. at 4691.
[16] *Id.*
[17] 47 U.S.C. § 532(g).

programmer-cable operators would make such additional rules unnecessary even if the Section 612(g) thresholds had been met.[18]

Given these statutory mandates and market realities, the Commission should clarify that the Survey Form is neither seeking nor considering information or requirements concerning non-video (*e.g*, high-speed data or telephony) services or customers.

II. Proposed Cable Subscribership Survey.

A. The Commission Has Recognized That The Historical Data Requested In The Survey Likely Is Unavailable.

The Joint Cable Commenters recommend that the Survey Form request data for calendar years 2007 and 2008 rather than for years 2006 and 2007 because, among other things, the Commission recognized in the *Thirteenth Annual Report* that historical data may be unavailable to cable operators. In other words, the Commission should eliminate the reference to 2006 data in Question 2, allow a cable operator to certify to the Commission that it does not possess the requested information for calendar year 2007 and that it is impossible for the operator to compile such data, and instead seek relevant information for calendar year 2008 (or the most recently completed calendar year prior to distribution of an OMB-approved Survey Form).

Question 2 of the proposed Survey Form requires operators to identify whether the data they are providing reflects the state of the relevant system during the last full week of 2006 or 2007.[19] Given the lengthy period between the adoption and public release of the *Thirteenth Annual Report*, however, cable operators may no longer have the historic data necessary to complete the survey for either year. In November 2007, when the Commission adopted the

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[18] *See* Section II.C. *infra*; *see also* Applications for Consent to the Assignment and/or Transfer of Control of Licenses, Time Warner Inc., and its subsidiaries, Assignor/Transferor To Time Warner Cable Inc., and its subsidiaries, Assignee/Transferee, *Memorandum Opinion and Order*, __ FCC Rcd __, DA 09-73 (rel. Feb. 11, 2009) (approving separation of Time Warner, Inc. and Time Warner Cable, Inc.) ("*Time Warner Separation Order*"); Esbin, *Vertical Dis-Integration*, The Progress and Freedom Foundation Blog (posted Feb. 11, 2009), *available at* http://blog.pff.org/archives/2009/02/print/005460.html (noting that percentage of vertically integrated programmers would decrease from 14.9% in June 2006 to 8% once the Time Warner Cable spin-off is consummated).

[19] *Survey Form Public Notice* at 8.

Thirteenth Annual Report, it recognized this potential problem and held that a cable operator may certify that it could not compile sufficient information for calendar year 2006 (then only eleven months earlier) to complete the Survey Form.[20] Today, fourteen months later, operators would face the same or greater challenges providing 2007 data as they would have faced providing 2006 data when the *Thirteenth Annual Report* was adopted.[21] Indeed, inasmuch as OMB must approve the information collection reflected in the proposed Survey Form and comments in that proceeding are not even due until March 27, 2009,[22] cable operators will not be required to submit information in response to the proposed Survey Form, if at all, until many more months pass. The Commission, therefore, should eliminate the request for now-irrelevant 2006 data, allow operators to certify that they are unable to compile information regarding 2007, and instead request information for 2008 (or the most recent year preceding OMB approval of this information collection).

B. Cable Operators Have No Practical Means To Distinguish The Number Of Occupied, Unoccupied, Or Seasonal "Homes Passed" By A Cable Television System With Any Degree Of Accuracy.

The Commission should reconsider the proposed Survey Form's requirement that cable operators provide information regarding the occupied, unoccupied, and seasonal "homes passed" by their cable television systems[23] because cable operators have no practical or accurate means of complying with this requirement.

Although cable operators have records of the actual residential customers that their cable systems serve, they have no records or accurate method for determining whether residences in the areas served by their cable systems, or in discrete portions of their cable systems, are

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[20] *Thirteenth Annual Report*, __ FCC Rcd at __, note 105.

[21] As discussed in greater detail in Section II.D., the geographic areas associated with USPS zip code routes change frequently. To provide the requested historic information, cable operators would need to associate customer addresses with zip code routes as they existed in 2006 or 2007. As a practical matter, this simply is infeasible.

[22] *See* 74 Fed. Reg. 4437 (Jan. 26, 2009).

[23] *Survey Form Public Notice* at 8.

unoccupied or only seasonally occupied absent an inordinately burdensome and costly house-by-house survey. The only reliable information occupied and seasonal household information of which the Joint Cable Commenters are aware is that produced by the decennial census, which the Census Bureau will compile next year. Moreover, the other sources identified in the Survey Form for calculating such information likely would fail the quality, objectivity, utility, and integrity guidelines of the 2001 Data Quality Act and the Commission's associated rules.[24] To the extent accurate occupied and seasonal household information is required for purposes of Section 612(g), therefore, the Joint Cable Commenters recommend that the Commission rely upon the 2010 Census to obtain it.

Question 5.a. of the proposed Survey Form asks operators to provide, for the relevant cable system, the number of occupied residential units passed by the system plant excluding non-permanent or commercial buildings or portions of buildings.[25] Cable operators, however, cannot respond to this question with any reliable degree of accuracy on the basis of their business records or the other sources identified in the proposed Survey Form. Cable operators could provide with relative accuracy the total number of residential and commercial buildings passed by their cable systems, but they have no practical and reliable way of knowing how many of the total residential units a system passes are occupied or are used only on a seasonal basis. Cable operators also do not necessarily possess detailed records regarding the composition of multiple dwelling or mixed-use buildings or receive immediate notice of new construction in areas passed by their existing facilities. Absent these details, operators cannot accurately respond to Question 5.a. Furthermore, although expensive and extensive door-to-door field investigations — such as those conducted in the decennial census — could provide information regarding the current state of housing units passed by a system, an investigation into the occupancy status or seasonal use of

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[24] *See* Implementation of Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Pursuant to Section 515 of Public Law No. 105-554, *Information Quality Guidelines*, 17 FCC Rcd 19890 (2002).

[25] *See Survey Form Public Notice* at 8.

system-wide housing units in 2006 and 2007, as requested in the proposed Survey Form, would be impossible as a practical matter.

Even in ideal circumstances, operators could not rely on 2000 decennial census data to respond to Question 5.a. For example, if an operator's cable system passed every "household" in a census-surveyed community, and if the municipal boundaries of that community had not changed since 2000, an operator still could not certify as accurate for 2006 and 2007 data from the 2000 census because that data would be half a decade old. The Joint Cable Commenters acknowledge that the Commission, in allowing operators to submit only good-faith estimates based on information sources that are not authoritative, has realized the difficulties operators would face in responding to questions on the proposed Survey Form,[26] but are concerned about the utility of data the Commission knows to be imprecise or inaccurate.

Question 5.a.i. of the proposed Survey Form asks operators to provide, for the relevant cable system, the "number of housing units that are unoccupied or used for seasonal, occasional, or recreational use."[27] Cable operators, however, have no significant business purpose for collecting this information, nor any accurate source of it for calendar years 2006 and 2007. The Census Bureau does not provide information regarding occupied housing units for calendar year 2006 or 2007, or for any years between the decennial census. The Census Bureau collected relevant housing data in the 2000 decennial census, but this information is only readily available for census-defined geographies such as incorporated areas and Census Defined Places ("CDPs"), which may or may not reflect cable system geographies. For later years, the Census Bureau provides only estimates for such areas, often with significant margins of error.[28] Because the

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[26] *Survey Form Public Notice* at 8.

[27] *Id*.

[28] *See, e.g.*, U.S. Census Bureau, 2005-2007 American Community Survey 3-Year Estimates, Silver Spring CDP, Maryland, *available through* http://factfinder.census.gov/ (last visited Feb. 9, 2009) (estimating 1,836 vacant housing units in Silver Spring with a margin of error of plus or minus 582 housing units — an error margin of more than thirty-one percent).

available accurate data predates the survey years by more than half a decade, operators cannot, and therefore should not be required to, certify that is accurate for calendar years 2006 and 2007.

Question 5.a.ii. of the proposed Survey Form asks operators to provide, for the relevant cable system, the "total number of housing units passed . . . whether or not they are occupied or used for seasonal, occasional, or recreational use."[29] As discussed above, cable operators have no practical access to accurate data regarding the number of units in or composition of multiple dwelling and mixed-use buildings passed by their facilities. Given these circumstances, the Joint Cable Commenters recommend that the Commission either revise or eliminate Questions 5.a., 5.a.i., and 5.a.ii. of the proposed Survey Form.

C. The Number of Customers Purchasing Internet and Telephony Services Is Irrelevant To Any Inquiry Under Section 612(g) Of The Act.

Inasmuch as the instructions to the proposed Survey Form may be misinterpreted to include non-video services such as high-speed data and telephony, and given the express limitation in Section 612 of the Act to video services and leased commercial access requirements as discussed above,[30] the Commission should clarify that the proposed Survey Form is limited to collecting information regarding video services and video customers.

Question 5.b. of the proposed Survey Form asks operators to provide, for the relevant cable system, the "total number of subscribers . . . who have access to the cable plant and receive any type of service."[31] Question 5.c., however, is limited to customers that purchase "basic tier cable service."[32] Notwithstanding the statutory limitations, the phrase "any type of service" in Question 5.b. is ambiguous and may be misinterpreted to include non-video services excluded by the statute. From the wording of the proposed instructions, however, the Joint Commenters believe that the Commission may instead be requesting in Question 5.b. a count of occupied

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[29] *Survey Form Public Notice* at 9.
[30] *See* Section I. *supra.*
[31] *Survey Form Public Notice* at 9.
[32] *Id.*

housing units that receive video service, including courtesy or free accounts. Operators may be unable to provide fully accurate data in response to either question, however. As discussed above, cable operators generally maintain no reliable information regarding seasonal and recreational dwellings. The Commission, therefore, should clarify that non-video subscribers should be excluded from the response to Question 5.b., and that the response to Question 5.b. should include courtesy and free accounts while the response to Question 5.c. should not.

The Commission also should give effect to the scope of Section 612(g) and acknowledge that information regarding subscribers to High Speed Internet ("HSI") and telephone services would be wholly irrelevant to the purpose of and justification for the proposed Survey Form. Indeed, the plain language and legislative history of Section 612(g) confirms that the relevant inquiry is limited to video subscribers and services,[33] and only authorizes the Commission to promulgate such rules as are necessary "to provide diversity of information sources" if the extent of vertical integration in the cable industry threatened that goal.

The Commission's annual video competition reports, however, confirm that the industry structure of which Congress was wary in 1984, and which Section 612(g) exists to address if necessary, plainly does not exist today. Instead, as the graph below demonstrates, according to the Commission's annual video competition reports, during the period from 1994 to 2006, the number of video programmers increased from 106 to 666 while the number of vertically integrated programmers increased from 56 to only 86.[34] In other words, the percentage of vertically integrated programmers consistently and significantly decreased from fifty-three

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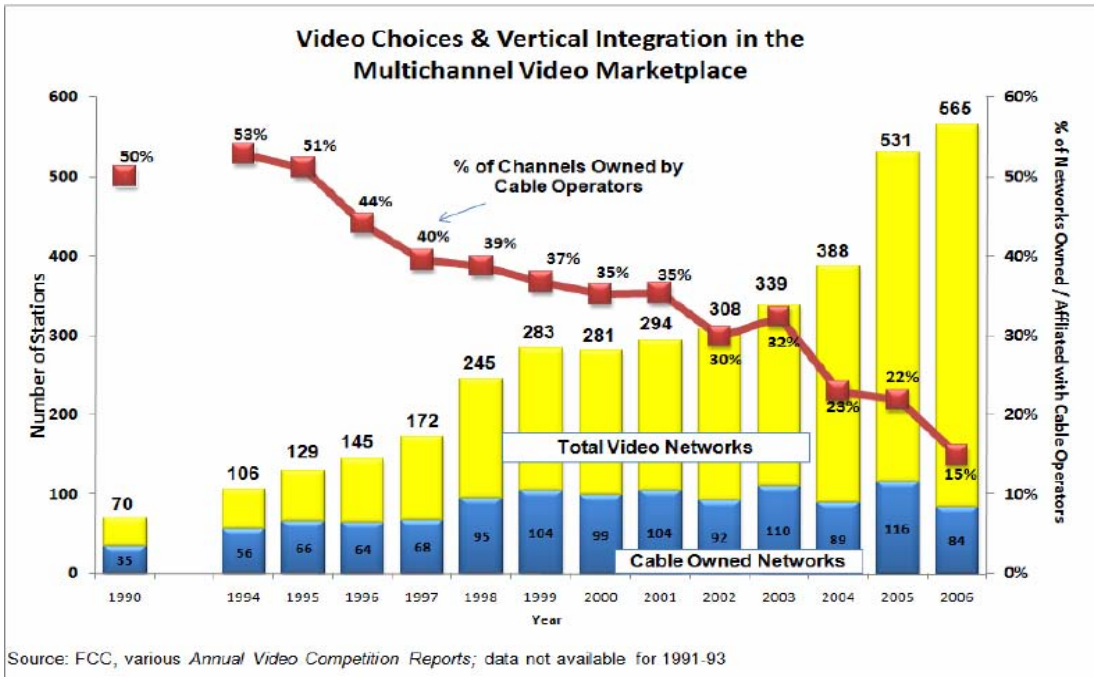
[33] *See* Section I. *supra*. The House Report explains that the "overriding goal in adopting [Section 612] is divorcing cable operator editorial control over a limited number of channels" and that "subsection 612(g) provides a mechanism to assure there is adequate flexibility to develop new rules and procedures with respect to the use of leased access channels as the cable industry develops and serves more citizens in the future." House Report at 50, 54, 50, 1984 U.S.C.C.A.N. at 4687, 4691. Because Section 612 as a whole is focused on video competition, the Section 612(g) benchmarks cannot be read so broadly as to include non-video subscribers and services.

[34] Graph excerpted from Esbin, *A Tale of Two Reports*, 16 PROGRESS ON POINT 1, 5 (2009) *available at* http://www.pff.org/issues-pubs/pops/2009/pop16.1taleoftworeports.pdf.

percent in 1994 to only fifteen percent in 2006. The trend documented in the Commission's previous video competition reports continues, and in fact is accelerating, today. Given the Commission's recent approval of the spin-off of Time Warner Cable from Time Warner, Inc., the percentage of vertically integrated programmers will decrease to only eight percent when that transaction is consummated.[35]



In short, the market already has achieved what any additional leased access regulations would be designed to promote: namely, significant diversity in information sources for cable video customers.[36]

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[35] *Time Warner Separation Order*, __ FCC Rcd __, DA 09-73 (rel. Feb. 11, 2009); *see* Esbin, *Vertical Dis-Integration*, The Progress and Freedom Foundation Blog (posted Feb. 11, 2009), *available at* http://blog.pff.org/archives/2009/02/print/005460.html.

[36] The Joint Cable Commenters also note that the Commission has relied on the broad availability of information from diverse sources such as the Internet, which was unthinkable in 1984, to justify a restrained regulatory hand in other areas, such as the relaxation of the newspaper-broadcast cross-ownership prohibition. *See, e.g.*, Cross-Ownership of Broadcast Stations and Newspapers, *Report and Order and Order on Reconsideration*, 20 FCC Rcd 2010 at para. 24-26 (2008).

D. Accurate Zip Code-Level Housing Information Regarding Cable Television Systems Is Unavailable For 2006 And 2007.

The Commission should reconsider the proposed Survey Form's request for occupied housing information by USPS zip code routes within areas served by cable systems because cable operators have no records containing or accurate methodology for obtaining such information. Contrary to popular belief, USPS zip code routes are not static and normally do not coincide with political boundaries or cable system service areas. Moreover, the Census Bureau only collects detailed housing information once every ten years and no such information is available for 2006 or 2007. To the extent the Commission requires occupied household information, it should obtain it directly from the Census Bureau or commercial providers following the decennial census next year.

Question 6 requires cable operators to provide the information requested in previous sections of the proposed Survey Form (*i.e.*, occupied homes passed, total subscribers, and video subscribers) by USPS zip code routes. As discussed above, cable operators are unlikely to have or be able to produce accurate occupied household data for their systems or for vaguely defined subsets of their systems. Therefore, the provision of household information by USPS zip code routes, particularly historic information from 2006 and 2007, necessarily introduces significant additional complexity and indisputable error into any data submitted.

1. Zip Codes Do Not Represent Static Geographic Areas.

As a threshold matter but contrary to popular belief, USPS zip codes do not represent precise geographies. Rather, they reflect the USPS regional and local distribution and delivery system, which it adjusts without notice as necessary to ensure efficient mail delivery.[37] This reality often leads to anomalies. For example, although the Commission's headquarters is located in an area where most delivery addresses are assigned the 20024 zip code, the

[37] U.S. Census Bureau, *Answers to Frequently Asked Questions about Census Bureau Geography Maps, and Mapping Engines*, attached hereto in Exhibit 1 ("*Census Mapping FAQ*") ("[Zip Codes] are networks of streets served by mail carriers or just individual post offices and are a tool for mail delivery").

Commission's unique zip code is 20554 because mail delivered to federal government addresses, among others, is routed differently than mail to civilian addresses. Therefore, even if cable operators maintained detailed occupied housing data by USPS zip code routes, which they do not, the accuracy of that information could not be assured beyond an extremely short period.

2. USPS Routinely Alters, Creates, And Eliminates Zip Code Routes.

The Commission's unstated assumption that cable operators are capable of providing detailed housing information by static USPS zip codes routes is erroneous because USPS routinely alters, creates, and eliminates those routes for mail delivery purposes. In other words, zip code routes are constantly changing and new zip codes are constantly being created or eliminated as population and construction patterns evolve. As populations within communities nationwide grow or decrease and as the geographic boundaries of the communities themselves expand or contract, USPS creates or eliminates zip codes and alters the delivery routes of existing zip codes as necessary to ensure efficient mail delivery.[38] USPS obviously does not consult with or advise cable operators when these adjustments are made. In the areas served by many cable systems, USPS has created a substantial number of new zip codes and has altered the existing zip code delivery routes of many others since December 2006, the earlier period from which the proposed Survey Form requests data.[39] Leaving aside the fact that cable operators likely do not maintain or have access to reliable occupied household data for their system areas, even assuming operators' customer records could be associated with zip code routes as they exist today, no readily available, reliable, or accurate way exists to associate those current geographies with zip code delivery areas as they may have existed in 2006 and 2007.

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[38] *See Census Mapping FAQ* ("U.S. Postal Service ZIP Codes are designed to meet the day-to-day operational needs of the U.S. Postal Service and tend to change more frequently than [census-defined geographies]").

[39] For example, in the area served by one cable operator's Phoenix, Arizona cable system, USPS created ten new zip codes in the period between December 2006 and July 2007, and likely altered the routes of numerous others. *See* Exhibit 2, U.S. Postal Service, New Zip Code Creation Report, July 2007 (listing numerous new zip codes nationwide).

3. The Census Bureau Does Not Produce Housing Data On A Zip Code Basis.

Perhaps the greatest impediment for cable operators to obtain occupied housing information by USPS zip codes routes is that not even the Census Bureau produces such information. The Census Bureau, which is the source of the most accurate publicly available occupied household data, has acknowledged the reality that USPS zip code routes do not represent precise geographic areas, and consequently provides no census information on a zip code basis. Instead, the Census Bureau created an analogue to zip codes, called Zip Code Tabulation Areas ("ZCTAs"), which, unlike zip codes, represent defined geographical census block areas.[40] Although the Census Bureau defined ZCTAs to reflect as closely as practicable the majority of addresses served by a particular zip code route as it existed at the time of the 2000 decennial census, "ZCTAs are not exact representations of UPSP's ZIP Code delivery areas" and "extend to adjacent census blocks" including various zip code routes.[41] The Census Bureau then used these ZCTAs as the basis for calculating relevant census household information. Indeed, "the Census Bureau [tabulated] the Census 2000 data by ZCTA, not U.S. Postal Service ZIP Code. Therefore, there are no ZIP Code products of any kind available from the Census 2000."[42] Inasmuch as even the Census Bureau does not collect or provide occupied household information by USPS zip codes, the Commission should not expect or require cable television operators to do so.

---

[40] *Id.* ("[D]ue to the public's interest in having statistics tabulated by ZIP Code, the Census Bureau has created a new statistical area called the ZIP Code Tabulation Area (ZCTA) for Census 2000. The ZCTAs were designed to overcome the operational difficulties of creating a well-defined ZIP Code area by using Census blocks (and the addresses found in them) as the basis for the ZCTAs.")

[41] U.S. Census Bureau, *Census 2000 ZCTAs™ ZIP Code Tabulation Areas for Census Bureau Data Products*, attached hereto as Exhibit 1.

[42] U.S. Census Bureau, *ZIP Code Tabulation Areas (ZCTAs)* ("*Census ZCTA Page")* attached hereto in Exhibit 1.

4. Mapping Addresses In Cable Operators' Business Records To Historic Zip Code Boundaries Would Be Inordinately Complex And Expensive.

Although cable operators theoretically could associate with census block groups the known geographic locations of every address (rather than every occupied household) their systems pass,[43] and then map those census block groups to defined zip code-type geographies that reflect historic zip code routes, this process would be extremely time consuming and expensive. The only readily available public source of zip code-like geographies, the Census Bureau's ZCTA geographic areas, were most recently updated in 2002 to reflect zip code changes through October 2002.[44] Private mapping companies can provide maps reflecting more current zip code delivery routes, and may even be able to provide maps reflecting historic zip code routes, but these specialized maps do not come without associated costs. The task of associating specific service addresses with historic zip code routes, moreover, is complex, and likely could not be accomplished on a system-wide basis without the help of a private mapping contractor that would charge many thousands of dollars to perform the work for each cable system. Without this sophisticated and expensive mapping process, however, any zip code-level data cable operators submit would be of questionable accuracy and therefore of limited utility to the Commission.

---

[43] The Census Bureau has aggregated Census 2000 blocks to correspond to ZCTAs that it has created. *See Census ZCTA Page*, Exhibit 1.

[44] *Id*. The Census Bureau has indicated it would not update ZCTA boundaries until the 2010 census. *Id*.

CONCLUSION

For the reasons set forth above, the Commission should reconsider the information required for cable operators to complete the proposed Survey Form. The information required would be unduly burdensome and exceedingly costly to produce and the results of the survey would be of questionable accuracy and, therefore, of limited utility to the Commission. Moreover, because the diversity of information sources available to cable television subscribers today is exponentially greater than at any previous time in the history of the cable television industry, no need exists for additional leased access rules even if the penetration thresholds set forth in Section 612(g) of the Act were met or exceeded.

Respectfully submitted,

BUCKEYE CABLEVISION, INC.
HARRON COMMUNICATIONS, L.P.
MIDCONTINENT COMMUNICATIONS
SERVICE ELECTRIC CABLE TV, INC.
SERVICE ELECTRIC CABLEVISION, INC.
US CABLE CORPORATION
WESTERN BROADBAND, LLC

By: _____

Gary S. Lutzker
Derek Teslik

DOW LOHNES PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 776-2000

February 17, 2009

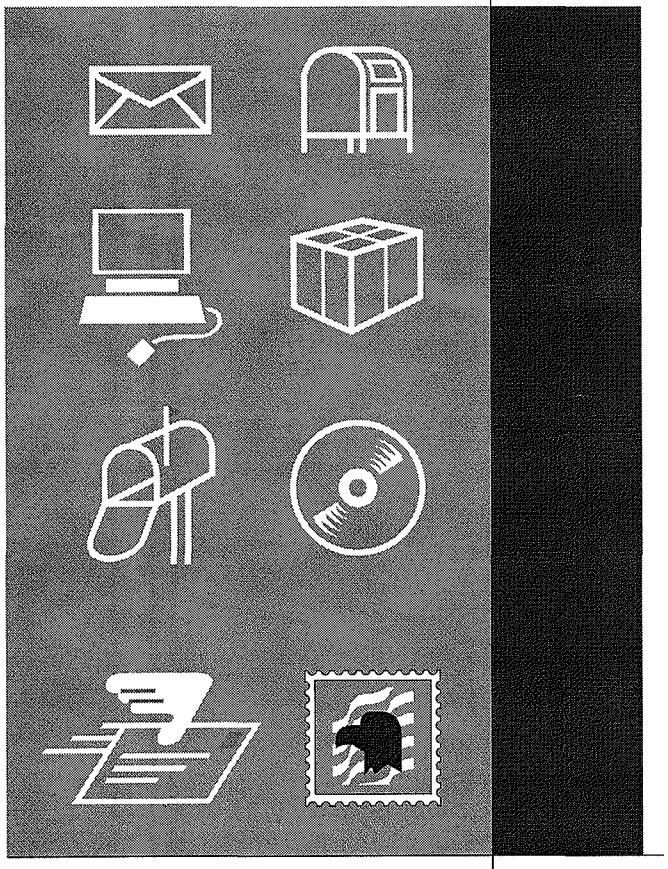
Their Attorneys

Exhibit 1

Zip Code and ZCTA Background

Census 2000 ZCTAs™
ZIP Code Tabulation Areas for
Census Bureau Data Products

2000



U S C E N S U S B U R E A U

Helping You Make Informed Decisions

United States Census 2000

What Are ZCTAs™?

ZIP Code Tabulation Areas (ZCTAs™) are a new statistical entity developed by the U.S. Census Bureau for tabulating summary statistics from Census 2000. ZCTAs are generalized area representations of U.S. Postal Service (USPS) ZIP Code service areas. They represent either USPS five- or three-digit ZIP Code areas. ZCTAs are created based on the following criteria:

- ZCTAs follow census block boundaries. The ZCTA code for each census block generally represents the majority ZIP Code of the addresses within that census block.
- **ZCTAs are not exact representations of the USPS's ZIP Code delivery areas.**
- ZCTA codes cover all land and water areas.
- ZCTAs include some dedicated post office box ZIP Codes in areas served only by post office boxes.
- ZCTAs representing post office box ZIP Codes generally have more than 10 addresses.
- ZCTAs exclude unique, single delivery point ZIP Codes, such as those for firms and organizations.
- ZCTAs are distinct from other Census Bureau statistical areas, such as census tracts, because they are not stable over time and are computer-delineated based on the location of addresses at the time of Census 2000 rather than manually delineated by local program participants or Census Bureau staff before the census.
- ZCTAs are distinct from other representations of ZIP Codes because they are based on address information and ZIP Codes collected or verified during Census 2000 operations.
- ZCTAs frequently cross county and place boundaries and may occasionally cross from one state into another.

ZCTA™ is a trademark of the U.S. Census Bureau.

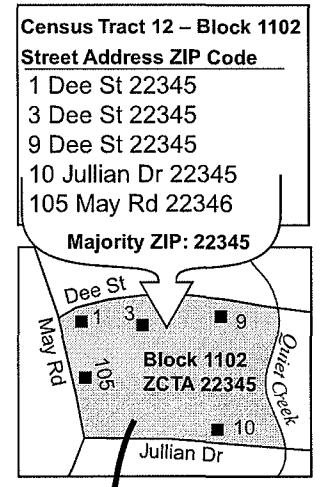
ZIP Code® is a registered trademark of the United States Postal Service.

TIGER/Line® is a registered trademark of the U.S. Census Bureau.

LandView® is a registered trademark of the National Oceanic and Atmospheric Administration.

American FactFinder® is a trademark of the U.S. Census Bureau.

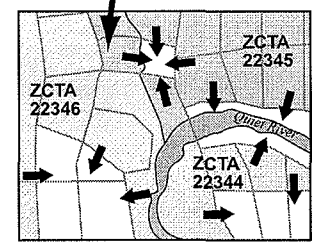
How ZCTAs Are Created



1. Determine the majority ZIP Code for each census block with addresses.

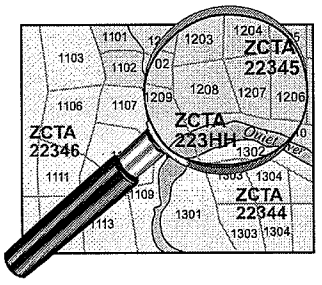
ZIP Codes are verified to ensure valid USPS values. The majority ZIP Code reflects residential and commercial addresses, including non-city-style addresses.

2. Assign a ZCTA code to every census block that contains addresses with ZIP Codes.



3. Extend ZCTA coverage to adjacent census blocks not assigned a ZCTA code.

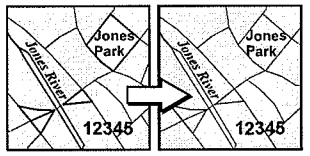
See "Extending ZCTA Coverage" for map examples.



4. Run edits and review results of the process.

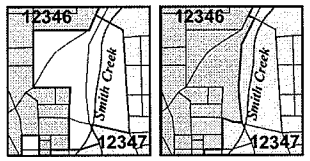
Edits set ZCTA codes assigned to water blocks and ensure that all Census 2000 tabulation blocks have an appropriate ZCTA code.

Extending ZCTAs Coverage



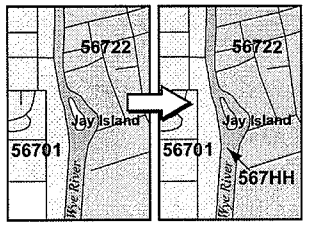
Fill holes within a ZCTA coverage

"Holes" (census blocks with no addresses) are assigned code of surrounding ZCTA.



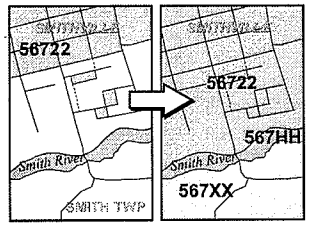
Fill gaps between ZCTAs

Each ZCTA grows outward to fill all gaps between ZCTAs.



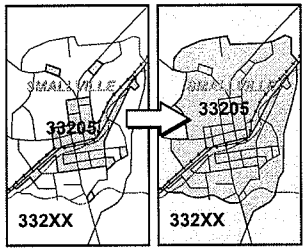
Assign ZCTAs to islands and water features

Islands are assigned to a nearby land ZCTA. Larger water features get a special ZCTA code (three-digit ZIP Code + "HH").



Assign ZCTAs to fringe areas

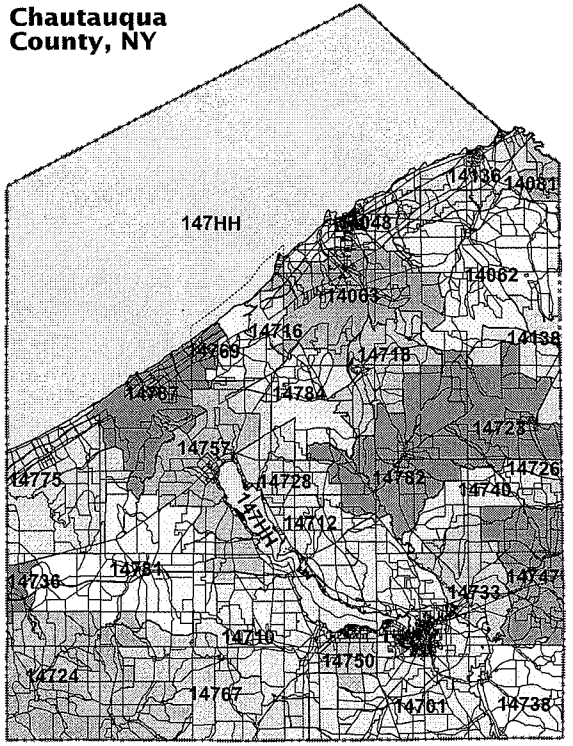
Unassigned blocks on a ZCTA edge are filled with the adjacent ZCTA code. Large undeveloped areas are assigned thethree-digit ZIP Code with a "XX" suffix.



Assign ZCTAs to sparsely settled areas

"Windows" that include the ZCTA "fragments" are assigned to one ZCTA. The rest of the area is assigned the three-digit ZIP Code with a "XX" suffix.

Census 2000 ZCTA Example



More Information on ZCTAs

Products and Services Staff

Phone: 301-763-1128
Fax: 301-457-4710
E-mail: geo.geography@census.gov
Web: http://www.census.gov/geo/ZCTA/zcta.html

Obtaining ZCTAs

Census 2000 TIGER/Line® Files:
ZCTAs for the entire United States and Puerto Rico will be available in the Census 2000 TIGER/Line® files. ZCTAs are stored in Record Type S.
http://www.census.gov/geo/www/tiger/

American FactFinder® Internet Site:
Users are able to plot ZCTA maps and create tables showing Census 2000 data tabulated by ZCTAs.
http://factfinder.census.gov/

Cartographic Boundary Files:
Generalized ZCTA boundary files are available for download from the Census Bureau's Internet site.
http://www.census.gov/geo/www/cob/

LandView® 5:
LandView® 5 is a desktop mapping system that allows users to display and plot ZCTAs along with other map features. Comes with a cartographic database for the entire United States.
http://landview.census.gov/

Summary Files 1 – 4 (SF 1 – 4):
Population and housing characteristics from Census 2000 will be tallied by ZCTA. SF 1and SF 2 contain the 100 percent data from the short form. SF 3 and SF 4 contain the sample data from the long form.
http://www.census.gov/dmd/www/2khome.htm

Ordering ZCTA Products

Customer Services

Phone: 301-763-INFO (4636)
Fax: 301-457-3842 (fax orders only)
Web: http://www.census.gov/mp/www/Tempcat/how2ordr.html

U.S. Department of Commerce
Economics and Statistics Administration
U.S. CENSUS BUREAU

Issued September 2001
MSO/01-ZCTA

U.S. Census Bureau

ZIP Code® Tabulation Areas (ZCTAs™)

ZIP Code Tabulation Areas (ZCTAs™) are a new statistical entity developed by the U.S. Census Bureau for tabulating summary statistics from Census 2000. This new entity was developed to overcome the difficulties in precisely defining the land area covered by each ZIP Code®. Defining the extent of an area is necessary in order to accurately tabulate census data for that area.

ZCTAs are generalized area representations of U.S. Postal Service (USPS) ZIP Code service areas. Simply put, each one is built by aggregating the Census 2000 blocks, whose addresses use a given ZIP Code, into a ZCTA which gets that ZIP Code assigned as its ZCTA code. They represent the majority USPS five-digit ZIP Code found in a given area. For those areas where it is difficult to determine the prevailing five-digit ZIP Code, the higher-level three-digit ZIP Code is used for the ZCTA code. For more information, please refer to the ZCTA (FAQ) Frequently Asked Questions Web page.

It is important to note the following:

- In most instances the ZCTA code equals the ZIP Code for an area
- In creating ZCTAs, the Census Bureau took the ZIP Code used by the majority of addresses in a area for the ZCTA code, some addresses will end up with a ZCTA code different from their ZIP Code.
- Some ZIP Codes represent very few addresses (sometimes only one) and therefore will not appear in the ZCTA universe.
- The term ZCTA was created to differentiate between this entity and true USPS ZIP Codes.
  Information on the Census Bureau's position regarding ZIP Code data.
- ZCTA is a trademark of the U.S. Census Bureau; ZIP Code is a registered trademark of the U.S. Postal Service.
- The Census Bureau does not have U.S. Postal Service ZIP Code boundary files, nor do we have information or possible sources of such files.
- Census Bureau data sets tabulated by ZIP Code are listed on the ZIP Code Statistics page.

The following items are available for ZCTAs:

- 2000 U.S. Gazetteer ZCTA File
  Contains United States Postal Service State Abbreviation/ZCTA/ Total Population (2000)/Total Housing Units (2000)/ Land Area (square meters)/Water Area (square meters)/ Land Area (square miles)/Water Area (square miles)/ Latitude (decimal degrees)/Longitude (decimal degrees)
- ZCTA Brochure [PDF] suitable for printing
- ZCTA Brochure [PDF] suitable for viewing
- ZCTA Brochure [PDF] print and fold version

- State Data Center ZCTA Full Presentation [PDF]
- State Data Center ZCTA Short Presentation [PDF]
- Technical Documentation for the Census 2000 ZCTAs [PDF]
- Cartographic boundary files for ZCTAs
- Census 2000 Summary File 1

The 2003, and later versions, of the TIGER/Line® files contain updated national ZCTAs reflecting U.S. Postal Service ZIP Code changes through October, 2002. There will be no further updates of ZCTAs until required for the 2010 Census.

As described above, the Census Bureau is tabulating the Census 2000 data by ZCTA, not U.S. Postal Service ZIP Code. Therefore, there are no ZIP Code products of any kind available from the Census 2000.

Feedback

[PDF] or denotes a file in Adobe's Portable Document Format. To view the file, you will need the Adobe® Acrobat® Reader available **free** from Adobe.

Source: U.S. Census Bureau
Geography Division
Created: April 16, 2001

U.S. Census Bureau

ZIP Code Statistics

Statistics about people, households, personal income, labor force, housing:

- Census 2000 data may be retrieved at http://factfinder.census.gov. See the step-by-step example below. Data are also available via FTP.
- Data from the 1990 Census of Population and Housing are also available in http://factfinder.census.gov, although the steps are a little different.

Statistics about business establishments:

- 2002 Economic Census ZIP Code Statistics -- counts of establishments by detailed NAICS industry by receipt size--are available on American FactFinder and on 2002 Economic Census DVD-ROM Volume 2. 2002 ZIP code data include only 8 of the 18 sectors covered by the Economic Census.
- 1997 Economic Census ZIP Code Statistics include a simple display on-line. More extensive statistics--counts of establishments by detailed NAICS industry by employment size and receipt size--are available on 1997 Economic Census CD-ROM Volume 3. 1997 ZIP code data include only 9 of the 18 sectors covered by the Economic Census.
- 1992 Economic Census ZIP Code Statistics are available only on 1992 Economic Census CD-ROM, Volume 2, but, since they are classified by SIC, they are not entirely comparable to the 1997 NAICS-based data.
- ZIP Business Patterns (ZBP) provides counts of establishments by industry by employment size for a broader range of industries than are included in the Economic Census ZIP Code Statistics. ZBP is published generally 2 to 3 years after the end of the reference year, starting 1994. Data are available in an on-line lookup system at http://censtats.census.gov/cbpnaic/cbpnaic.shtml. Starting in 1998, the data are classified by NAICS. 1994 to 1997 data were classified by SIC.

General issues:

ZIP codes are defined at the convenience of the U.S. Postal Service and may change from time to time.

ZIP codes in the Economic Census and ZBP are those reported by the businesses or on administrative address lists. ZIP Code tabulation areas (ZCTAs) in Census 2000 are statistical geographic entities that approximates the delivery area for a U.S. Postal Service five-digit and three-digit ZIP Codes. ZCTAs are aggregations of census blocks that had the same predominant ZIP Code associated wth the residential mailing addresses in the Census Bureau's master address file for Census 2000.

Maps: To obtain a map of a single ZIP Code tabulation area, follow steps 1 through 4.3. below, then select a single 5-digit code and click the "Map It" button. Census 2000 ZCTA maps are also accessible from the 1997 Economic Census ZIP Code Statistics.

There are two different paths to 2000 Census ZIP Code data. The simplest, but least flexible, is to

1. At www.census.gov, select "American FactFinder" in the left column.
2. In the lefthand column, select the "People" button and pick a topic.
3. Enter a 5-digit code in the ZIP code field and press the "Go" button.
4. Select one of the detailed tables or maps presented there.

If you want to create a consolidated table with different ZIP Codes in successive columns,

1. At www.census.gov, select "American FactFinder" in the left column.
2. In the lefthand column, select the "Data Sets" button, then "Decennial Census".
3. On the Decennial Census page
   a. Select the data set: Click the radio button next to one of the following:
      - "2000 Summary File 1" (to select age, race and hispanic origin, household relationship, owners and renters, etc) or
      - "2000 Summary File 3" (to select migration, education, employment, income, housing characteristics).
   b. In the righthand column select "Detailed Tables"
4. On the Select Geography page,
   a. In the "select a geographic type" box, pick "5-digit ZIP Code Tabulation Area" at the bottom of the menu.
   b. Select the first 3 digits of the ZIP code
   c. Select one or more 5-digit ZIP codes and click "Add".
   d. Click on "Next" (If you don't see the "Next" button, scroll right until you do.)
5. On the Select Tables page
   a. Select one or more of the tables from the list. Search "by keyword" or "by subject" if necessary.
   b. Click "Add"
   c. Click "Show Result"

Notes:

- To obtain a map of a single ZIP Code tabulation area, follow steps 1 through 4.b., then select a single 5-digit code and click the "Map It" button.
- When selecting ZIP Code data in 1990 Census Summary Tape File 3, you must click on "Show all geography types" on the Select Geography page to see ZIP codes as an option under "Select a geographic type".

You can obtain a list of all ZIP Code Tabulation areas within a county (or place or state) with these steps:

1. At www.census.gov, select "American FactFinder" in the left column.
2. In the lefthand column, select the "Data Sets" button, then "Decennial Census"
3. On the Decennial Census page
   a. In the righthand column select "Detailed Tables"
4. On the Select Geography page,
   a. Select the "geo within geo" tab
   b. In the "Show me all" box, pick "5-digit ZIP Code Tabulation Areas"

   c. Under "That are", either leave at "fully or partially contained" or change to "fully contained" and specify "county" after "within".
   d. Select the state
   e. Select the county
   f. Select "All 5-digit ZIP Code Tabulation Areas" and click the "Add" button, but make a list for yourself of the specific ZIP Codes shown in red with an asterisk in the selection boxe. If you want to differentiate that part of each ZCTA that is really in a particular county, you will need to take the following steps.
      1. Click the "List" tab at the top
      2. Select "Show all geographic types"
      3. Select ".... .... County (or part)" under "5-digit ZIP Code Tabulation Area (or part)"
      4. Select the state
      5. Select a 3-digit ZCTA corresponding to the first asterisked ZCTA on your list
      6. Select the 5-digit ZCTA
      7. Select the desired county part
      8. Click "Add"
      9. Repeat steps 5 to 8 for each of the partial ZCTAs on your list. The county parts of ZIPs will appear at the end of the list in the "Current geography selected" box.
   g. Click on "Show Result"
5. On the Select Tables page
   a. Select table P1 for the total population, or any others you want, and click "Add"
   b. Click "Show Result"
6. Only 10 ZCTAs are shown on the screen. To work with them all at once, you will need to download the data.
   a. Under "Print/Download" at the top, click on "Download"/li>
   b. Select "Comma delimited (.csv) (transpose rows and columns)" if you want to load the results into your spreadsheet, or select "Rich Text Format (.rtf) (transpose rows and columns)" if you want to display the result in your word processor.
   c. Click "OK" down at the bottom of the page
   d. Save the file to disc or open it in your application.

To access 1990 Census ZIP Code data in American FactFinder, use the following steps:
Questions?

1. At www.census.gov, select "American FactFinder" in the left column.
2. In the lefthand column, select the "Data Sets" button, then "Decennial Census".
3. On the Decennial Census page
   a. Click on the tab for 1990 Census
   b. Select the data set: Click the radio button next to "1990 Summary Tape File 3"
   c. In the righthand column select "Detailed Tables"
4. On the Select Geography page,
   a. Click the link "Show all geographic types"
   b. In the "select a geographic type" box, under State...County, pick "ZIP Code (or part)"
   c. Select a state

   d. Select a county
   e. Select one or more 5-digit ZIP codes, or "All ZIP Codes (or parts)", and click "Add".
   f. Click on "Next" (If you don't see the "Next" button, scroll right until you do.)
5. On the Select Tables page
   a. Select one or more of the tables from the list. Search "by keyword" or "by subject" if necessary.
   b. Click "Add"
   c. Click "Show Result"

U.S. Census Bureau

Answers to Frequently Asked Questions about Census Bureau Geography, Maps and Mapping Engines

Please take a few moments to review this page before sending questions concerning the TIGER® (Topologically Integrated Geographic Encoding and Referencing) Map Service (TMS) and Gazetteer applications, Maps, ZIP Codes® and other U.S. Census Bureau geography. You will find the answers to most of the questions we receive here, or we provide links or suggestions of other places to look. The TIGER Map Service is an old, experimental system, based on the 1998 TIGER/Line® files and 1990 Census data. It **DOES NOT REPRESENT** the most recent address information available to the U.S. Census Bureau as a result of the **2000 DECENNIAL CENSUS.**

United States Census 2000 Information about Census 2000 data is located at Your Gateway to Census 2000

Select a topic from the menu below or scroll down to view answers to Frequently Asked Questions (FAQs).

- **TIGER Map Service**

The TIGER Map Service was built in 1995 as a **proof of concept** to see what it took to build a basic Web mapping application. It remains on our web site because there are people who still find it useful in spite of it's limitations. **It was never intended to be a general purpose mapping application to fill every mapping need.** We show **U. S. maps only**. We've had extremely limited resources since then to add improvements. We will make incremental improvements as resources permit. There are **no hidden features** in this application. All TIGER Map Service capabilities are outlined in the **FAQs**. If it is not explicitly stated that a certain function can be performed using the TIGER Map Service, then it cannot be done. The map data used in the TIGER Map Service application comes from the Census Bureau's 1998 TIGER/Line file data set. The ZIP Code information reflects the 1998 TIGER/Line data set. For the continental U. S., the data references the 1983 North American Datum (NAD 83).

As noted above, the TIGER Map Service was developed as an experiment in Web-based mapping. The Bureau's main effort now, in conjunction with private contractors, is in the development of a separate and more elaborate data delivery and mapping system called the American FactFinder. The Census Bureau has continued to maintain the TIGER Map Service because it has proved useful to the general public. It was never intended to be a robust all-purpose mapping system to meet the needs of high-volume government, business or other organizations' applications.

The Census Bureau will not commit to diverting its resources to subsidize the operations of others, no matter how worthy the goals of such an application. It was not intended as a substitute for agencies, businesses, or other organizations developing their own mapping applications. If you need a major map plotting application for your site you should develop your own software and hardware system to support it. ***Any application that uses our mapping service does so at the user's risk.*** The Census Bureau plans continue to try to maintain the TIGER Map Service for at least the near future at its current level, ***but we accept no obligation to provide special support (or timely repair)*** of the system so that it can meet some other governmental, commercial or organizational mission.

We **cannot** provide the **TMS source code**. The TIGER Map Service (TMS) was started in 1995 as a "proof of concept" of a basic Web mapping application, and was not done with a view to providing the public with Internet mapping software. This application was developed by adapting an existing piece of mapping software to create maps on the Internet. This test application was not completely documented as the Census Bureau never intended to disseminate it to the public. As written, the software is hardware specific and some components of the uncompiled source code used to generate the mapping engine have been lost.

There are several commercial map packages available now that can provide Internet map images. We suggest that you look at some of these applications for models of this type of software. Top of page

- **Census Tract/Block Numbering Areas**

While you can turn on **Census Tract/Block Numbering Area boundaries,**

the Census Tract/Block Numbering Area **numbers are not available on the map.** Street names are not shown. If one wants to identify Tracts or Block Numbering Areas for address coding or other purposes there are a variety of resources available. Try the Reference Map feature of the American FactFinder. See the Vendor List for leads to commercial software packages. Here is a **list of resources** for determining an address's census tract number. Link to Empowerment Zone Resource information. Top of page

- **City Data and Maps**

We do not have a list of cities of the world with their locations. However, for information about **U.S. Metropolitan Areas,** definitions and the component parts of each try the link to the Metropolitan Areas page. For information on the **land area** of various levels of geography try this link. For a **ranking** of cities by land area try this link. For leads on other possible sites for foreign city information start at this URL: http://www.census.gov/geo/www/gis-gateway.html. Another possibility is using one of the WWW search engines such as Yahoo or Alta Vista using the term "city". Top of page

- **Driving Directions**

We do not give driving directions between points nor do we have bus or subway maps. However, there are a number of commercial sites that do. Try looking for them with one of the Web search engines using the key word "maps". Top of page

- **Gazetteer**

This geographic place name look-up application was an early test program based on 1990 census data. It was left on our web site because some people still find it useful. It is not advertised as, nor does it represent the current list of incorporated places or Census Designated places in the United States. Top of page

- **Genealogy**

We cannot look up **genealogical information** or family histories. The only information we have about this subject is on our Genealogy page. **We cannot help you find relatives or where individual people live now or where they lived in the past.** Top of page

- **Glossary**

  See this page for a Glossary of Census 2000 Geographic terms. For detailed information on Census Bureau geographic terms and concepts see the Geographic Areas Reference Manual. Top of page

- **Public Domain Maps**

  The Census TIGER data base is the source for maps generated by the TIGER Map Service. The data used to create the maps comes from the Census Bureau, an agency of the U.S. Government, and is in the public domain. Thus **the maps** you can download from this site **are in the public domain** and you are free to use them as you choose. They are created on the fly and displayed on the screen in a raster (or bit map) format. They aren't meant to be imported into other mapping or GIS packages. They can be imported into many graphics or paint packages where they can be further manipulated to a limited extent. If you want the base data for use in your GIS or other mapping package visit our TIGER® Page for information on the TIGER/Line® product. We also have some **cartographic boundary files** accessible from this page. Top of page

- **Other Maps and Types of Information:**
  Contour, general purpose, State and County, etc.

  We do not have general purpose city, county or state maps. If you are looking for **general purpose maps** for use as graphic images, try some of the commercial clip art collections (some have both vector and raster images) or graphics design packages. Some of the word processing software suites also have them. A good source for general purpose **paper and digital maps** is the U.S. Geological Survey, they are also the source of geological and land use maps. Also, try your state/local Department of Transportation. For aeronautical and nautical charts try the National Ocean Service.

  We **do not have historical census maps** available online. We do have paper copies of tract maps dating from the 1960 Census available for purchase from our Jeffersonville, Indiana office at 812-288-3402.

  The National Archives and Records Center also has Census maps dating back to 1880. Although Federal census schedules date from 1790, the preparation of Enumeration District maps did not occur until 1880. These records, prepared on a decennial basis, include maps of counties, cities, towns, and unincorporated settlements, showing boundaries of the districts covered by the Census-takers (enumerators).

We **do not have maps** showing **historical county boundaries.** We understand that there are sites on the Web with this information but we don't know how accurate their information is.

We do have some information on the land area of various geographic areas. These data are based on the 1990 Census boundaries for these areas. Note that some counties and places have had changes in boundaries since 1990. We do not plan to update these data until we process the results of the Census 2000. Top of page

- **Elevation Data**

Our data base **does not contain topographic, elevation** or **terrain information** so we can't display contours. We do not need this information for our work and, even though it might be useful to others, we would not be permitted to expend the resources to add it. Try this link to the U.S. Geological Survey for information on Digital Elevation Models (DEM). Top of page

- **Property Line or Plat Maps**

We do not have maps that show **property lines** or that show ownership of property. Your local county/city assessment office is the place to look. Top of page

- **Maps of other countries**

We don't have **maps of other countries**. There is some population data about other countries in the Population Area pages. Another possible source of **population data, current and historical,** is the CIESIN project, but they are not affiliated with the Census Bureau. Top of page

- **Population and Economic Statistics**

If you want demographic or other types of data follow these links for the latest population or housing statistics for various levels of geography (state, metropolitan area, county, tract, etc.). Another area with **population and economic data** at the state and county level is State and County QuickFacts. These links should answer most questions, if not, go to the Census Bureau's Subjects A - Z page. Top of page

- **Street Names**

  Street names are not labeled because we haven't had the resources to implement that feature. The American FactFinder Reference Maps do offer this feature. Top of page

- **Cemeteries**

  We do not maintain a complete list of cemeteries, nor do we have a list of names of those buried in cemeteries. Our database contains a few cemeteries that were used as landmarks for our field interviewers, but we have no need to maintain a complete list. Top of page

- **Town and City Locations**

  When you ask the system to place a map pin on a town's location it puts it at the approximate center of the polygon formed by the legal boundaries as given to us by the state/local government. That means it could fall away from the built up area or even in the middle of a body of water. Since there are close to 50,000 places in the U.S. we don't have the resources to edit these locations manually to put them in a more "logical" place.

  The latitude and longitude we use comes from a data base that stores it in decimal degrees. The formula for converting back and forth from the more traditional degrees, minutes, and seconds format is given in TIGER FAQ 22. In TIGER FAQ 23 we discuss the level of precision (implied vs. real) in our coordinates.

  Use the U.S. Geological Survey's Geographic Names Information System (GNIS) to find the county that a place is in.

  Top of page

- **ZIP Code Information**

  The Census Bureau does not have maps or digital files showing the boundaries of U.S. Postal Service ZIP Codes. The fact that ZIP Codes aren't required to be polygons makes them difficult to map. They are networks of streets served by mail carriers or just individual post offices and are a tool for mail delivery. They also change periodically as required to meet Post Office operational needs. Various companies have created maps by interpolating boundaries between occurrences of ZIP Codes on the ground. However, this does not guarantee that the U.S. Postal Service delivery routes will follow this interpretation.

In the past, the Census Bureau produced the 1990 Gazetteer ZIP Code file and a 1999 ZIP Code file. These files were produced as byproducts of Census Bureau internal operations. They were not developed as a formal product. However, the Census Bureau has made them available to the public **"as is"**. There will be **no updated versions** of these files.

The Census Bureau will not be producing data files containing U.S. Postal Service ZIP Codes either as part of the Census 2000 product series or as a post Census 2000 product. However, due to the public's interest in having statistics tabulated by ZIP Code, the Census Bureau has created a new statistical area called the ZIP Code Tabulation Area (ZCTA) for Census 2000. The ZCTAs were designed to overcome the operational difficulties of creating a well-defined ZIP Code area by using Census blocks (and the addresses found in them) as the basis for the ZCTAs. For more information on the ZCTA delineation product and ZCTA-based products visit the ZCTA™ Web page.

There is no correlation between U.S. Postal Service ZIP Codes and U.S. Census Bureau geography. This is because individual U.S. Postal Service ZIP Codes can cross state, place, county, census tract, block group and census block boundaries (just to name a few). The geographic entities the Census Bureau uses to tabulate data by are relatively stable over time. For instance, census tracts are only defined every ten years. In contrast, U.S. Postal Service ZIP Codes are designed to meet the day-to-day operational needs of the U.S. Postal Service and tend to change more frequently than every ten years. Because of the ill-defined nature of ZIP Code boundaries, the Census Bureau does not have a file (crosswalk) showing the relationship between U.S. Census Bureau geography and U.S. Postal Service ZIP Codes.

ZIP Codes and Metropolitan Statistical Areas. We do not have any file that will relate Metropolitan Statistical Areas to U.S. Postal Service ZIP Codes.

ZIP Code Corrections. We cannot make ZIP Code corrections to our data sets based on e-mail messages. We can use only information that we receive through our cooperative operations with the U.S. Postal Service.

Further, **the Census Bureau does not offer "crosswalk" or "relationship" files that associate U.S. Postal Service ZIP Codes to any legal and statistical census geography.** For the most accurate and up-to-date ZIP Code data, we suggest contacting the source for ZIP Code information: the United States Postal Service. Again, for more definitive information on U.S. Postal Service ZIP Codes, contact the U.S. Postal Service.

- **Special Research Requests**

We are **not funded to do free research or compile sets of statistics** for people doing papers or working on government contracts. We have the resources to put up much, but not all, of the Census Bureau's data on the

Internet (some free and some for a fee). Most of it can be found by following the links from the Subjects A-Z page. If you have not been able to find the specific information you need after searching our Web site or need more background information, contact us using one of the e-mail links provided.

In some cases the Census Bureau will do special tabulations or research on a fee basis. For a specific special tabulation request, send a message to pop@census.gov for demographic statistics, or to econ@census.gov for economic statistics.

We do not provide information about, or the names of individual people or individual business establishments. Top of page

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United States Census 2000

Information about Census 2000 data is located at Your Gateway to Census 2000

- **E-Mail Contact Information**

Here are e-mail links for different types of Census Bureau information:

Questions on **Population statistics, contact** - pop@census.gov
Questions on **Income and Poverty, contact** - hhes-info@census.gov
Questions on **Economic and Business statistics, contact** - econ@census.gov

Please do not send e-mail to more than one of the addresses listed below:

Questions on **TIGER/Line files, contact** - geo.tiger@census.gov
Questions on **Maps and Boundary files, contact** - geo.tiger@census.gov
Questions on **General Census Geography, contact** - geo.geography@census.gov
Questions on **TIGER Map Service, contact** geo.geography@census.gov
Questions on **ZIP Codes, contact** U.S. Postal Service

Source: U.S. Census Bureau
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Exhibit 2

July 2007
New Zip Code Creation Report

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
Old	03-6364	85085	AZ	Phoenix	Maricopa	Daisy Mountain	Classified Station		
New	03-6364	85083	AZ	Phoenix	Maricopa	Daisy Mountain	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Phoenix AZ 85083 as last line of address for 3,612 deliveries previously in ZIP Code 85085.
Old	03-1221	85222	AZ	Casa Grande	Pinal	Main Office	Post Office		
New	03-1221	85293	AZ	Casa Grande	Pinal	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Casa Grande AZ 85293 as last line of address for 1,822 deliveries previously in ZIP Code 85222.
Old	03-1221	85222	AZ	Casa Grande	Pinal	Main Office	Post Office		
New	03-1221	85294	AZ	Casa Grande	Pinal	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Casa Grande AZ 85294 as last line of address for 3,373 deliveries previously in ZIP Code 85222.
Old	03-5069	85239	AZ	Maricopa	Pinal	Main Office	Post Office		
New	03-5069	85238	AZ	Maricopa	Pinal	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Maricopa AZ 85238 as last line of address for 6,199 deliveries previously in ZIP Code 85239.
Old	03-6845	85242	AZ	Queen Creek	Maricopa	Main Office	Post Office		
New	03-6845	85240	AZ	Queen Creek	Maricopa	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Queen Creek AZ 85240 as last line of address for 6,071 deliveries previously in ZIP Code 85242.
Old	03-7659	85262	AZ	Scottsdale	Maricopa	Kachina	Classified Station		
New	03-7659	85266	AZ	Scottsdale	Maricopa	Kachina	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Scottsdale AZ 85266 as last line of address for 5,061 deliveries previously in ZIP Code 85262.
Old	03-1480	85248	AZ	Chandler	Maricopa	Main Office	Post Office		
New	03-1480	85286	AZ	Chandler	Maricopa	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Chandler AZ 85286 as last line of address for 6,494 deliveries previously in ZIP Code 85248.
Old	03-1480	85249	AZ	Chandler	Maricopa	Main Office	Post Office		
New	03-1480	85286	AZ	Chandler	Maricopa	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Chandler AZ 85266 as last line of address for 5,614 deliveries previously in ZIP Code 85249.
Old	03-0481	85323	AZ	Avondale Goodyear	Maricopa	Main Office	Post Office		
New	03-0481	85392	AZ	Avondale Goodyear	Maricopa	Avondale	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Avondale AZ 85392 as last line of address for 12,399 deliveries previously in ZIP Code 85323.
Old	03-5032	85653	AZ	Marana	Pima	Main Office	Post Office		
New	03-5032	85658	AZ	Marana	Pima	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Marana AZ 85653 as last line of address for 3,193 deliveries previously in ZIP Code 85658.
Old	03-0481	85338	AZ	Avondale Goodyear	Maricopa	Main Office	Post Office		
New	03-0481	85395	AZ	Avondale Goodyear	Maricopa	Goodyear	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Goodyear AZ 85395 as last line of address for 8,478 deliveries previously in ZIP Code 85338.
Old	03-3404	85296	AZ	Gilbert	Maricopa	Main Office	Post Office		
New	03-3404	85295	AZ	Gilbert	Maricopa	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Gilbert AZ 85295 as last line of address for the 7,764 deliveries previously in ZIP Code 85296.
Old	03-3404	85297	AZ	Gilbert	Maricopa	Main Office	Post Office		

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
New	03-3404	85298	AZ	Gilbert	Maricopa	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Gilbert AZ 85298 as last line of address for the 4,841 deliveries previously in ZIP Code 85297.
Old	03-3478	85310	AZ	Glendale	Maricopa	Arrowhead	Classified Station		
New	03-6364	85083	AZ	Phoenix	Maricopa	Daisy Mountain	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Phoenix AZ 85083 as last line of address for the 1,986 deliveries previously in ZIP Code 85310.
Old	05-6678	95814	CA	Sacramento	Sacramento	Main Office	Post Office		
New	05-6678	95811	CA	Sacramento	Sacramento	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Sacramento CA 95811 as last line of address for 5,060 deliveries previously in ZIP Code 95814.
Old	05-4794	95901	CA	Marysville	Yuba	Main Office	Post Office		
New	05-5622	95961	CA	Olivehurst	Yuba	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Olivehurst CA 95961 as last line of address for the 3,580 deliveries previously in ZIP Code 95901.
Old	05-4794	95901	CA	Marysville	Yuba	Main Office	Post Office		
New	05-8400	95692	CA	Wheatland	Yuba	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Wheatland CA 95692 as last line of address for the 4 deliveries previously in ZIP Code 95901.
Old	05-4878	95340	CA	Merced	Merced	Main Office	Post Office		
New	05-0384	95301	CA	Atwater	Merced	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Atwater CA 95301 as last line of address for the deliveries previously in ZIP Code 95340.
Old	05-8544	95388	CA	Winton	Merced	Main Office	Post Office		
New	05-0384	95301	CA	Atwater	Merced	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Atwater CA 95301 as last line of address for the deliveries previously in ZIP Code 95388.
Old	05-4878	95348	CA	Merced	Merced	Main Office	Post Office		
New	05-0384	95301	CA	Atwater	Merced	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Atwater CA 95301 as last line of address for the deliveries previously in ZIP Code 95348.
Old	05-4878	95340	CA	Merced	Merced	Main Office	Post Office		
New	05-4878	95341	CA	Merced	Merced	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Merced CA 95341 as last line of address for the deliveries previously in ZIP Code 95340.
Old	05-5562	92054	CA	Oceanside	San Diego	Brook Street	Classified Station		
New	05-5562	92058	CA	Oceanside	San Diego	Brook Street	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Oceanside CA 92058 as last line of address for the 14,010 deliveries previously in ZIP Code 92054.
Old	05-2274	91010	CA	Duarte	Los Angeles	Main Office	Post Office		
New	05-2274	91008	CA	Duarte	Los Angeles	Bradbury	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Bradbury CA 91008 as last line of address for the 415 deliveries previously in ZIP Code 91010.
Old	05-1080	94514	CA	Byron	Contra Costa	Discovery Bay	Classified Station		
New	05-1080	94505	CA	Byron	Contra Costa	Discovery Bay	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Discovery Bay CA 94505 as last line of address for the 5,079 deliveries previously in ZIP Code 94514.
Old	05-0954	95526	CA	Bridgeville	Trinity	Main Office	Post Office		
New	05-4684	95552	CA	Mad River	Trinity	Main Office	Post Office	05/01/2007	Realign ZIP Code boundaries. Use Mad River+J2 CA 95552 as last line of address for the 13 deliveries previously in ZIP Code 95526.

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
Old	07-1818	80913	CO	Colorado Springs	El Paso	Fort Carson	Classified Station		
New	07-1818	80902	CO	Colorado Springs	El Paso	Fort Carson	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Colorado Springs CO 80902 as last line of address for 3,809 deliveries previously in ZIP Code 80913.
Old	07-1080	80020	CO	Broomfield	Broomfield	Main Office	Post Office		
New	07-1080	80023	CO	Broomfield	Broomfield	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Broomfield CO 80023 as last line of address for 4,332 deliveries previously in ZIP Code 80020.
Old	07-5706	80537	CO	Loveland	Larimer	Main Office	Post Office		
New	07-4932	80534	CO	Johnstown	Larimer	Main Office	Post Office	06/23/2007	Realign ZIP Code boundaries. Use Johnstown CO 80534 as last line of address for the 324 deliveries previously in ZIP Code 80537.
Old	11-9810	33544	FL	Zephyrhills	Pasco	Main Office	Post Office		
New	11-9810	33545	FL	Zephyrhills	Pasco	Wesley Chapel	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Wesley Chapel FL 33545 as last line of address for the 3,651 deliveries previously in ZIP Code 33544.
Old	11-9810	33543	FL	Zephyrhills	Pasco	Main Office	Post Office		
New	11-9810	33544	FL	Zephyrhills	Pasco	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Zephyrhills FL 33544 as last line of address for the 3,543 deliveries previously in ZIP Code 33543.
Old	11-7965	33569	FL	Riverview	Hillsborough	Main Office	Post Office		
New	11-7965	33578	FL	Riverview	Hillsborough	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Riverview FL 33578 as last line of address for 12,632 deliveries previously in ZIP Code 33569.
Old	11-7965	33569	FL	Riverview	Hillsborough	Main Office	Post Office		
New	11-7965	33579	FL	Riverview	Hillsborough	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Riverview FL 33579 as last line of address for 6,092 deliveries previously in ZIP Code 33569.
Old	11-9150	33594	FL	Valrico	Hillsborough	Main Office	Post Office		
New	11-9150	33596	FL	Valrico	Hillsborough	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Valrico FL 33596 as last line of address for 10,426 deliveries previously in ZIP Code 33594.
Old	11-8925	33647	FL	Tampa	Hillsborough	New Tampa	Classified Station		
New	11-8925	33646	FL	Tampa	Hillsborough	New Tampa	Classified Station	07/01/2007	Establish a new ZIP Code for Post Office Boxes. Use Tampa FL 33646 as last line of address for all of the 1,880 Post Office Boxes previously in ZIP Code 33647.
Old	11-5190	33971	FL	Lehigh Acres	Lee	Main Office	Post Office		
New	11-5190	33973	FL	Lehigh Acres	Lee	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Lehigh Acres FL 33973 as last line of address for 3,346 deliveries previously in ZIP Code 33971.
Old	11-5190	33936	FL	Lehigh Acres	Lee	Main Office	Post Office		
New	11-5190	33974	FL	Lehigh Acres	Lee	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Lehigh Acres FL 33974 as last line of address for 2,204 deliveries previously in ZIP Code 33936.
Old	11-5190	33936	FL	Lehigh Acres	Lee	Main Office	Post Office		
New	11-5190	33972	FL	Lehigh Acres	Lee	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Lehigh Acres FL 33972 as last line of address for the 1,352 deliveries previously in ZIP Code 33936.
Old	11-5190	33972	FL	Lehigh Acres	Lee	Main Office	Post Office		

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
New	11-5190	33936	FL	Lehigh Acres	Lee	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Lehigh Acres FL 33936 as last line of address for the 2,998 deliveries previously in ZIP Code 33972.
Old	11-9165	34287	FL	Venice	Sarasota	North Port	Classified Branch		
New	11-9165	34290	FL	Venice	Sarasota	North Port	Classified Branch	07/01/2007	Establish a new ZIP Code for Post Office Boxes. Use Venice FL 34290 as last line of address for all of the 876 Post Office Boxes previously in ZIP Code 34287.
Old	11-6600	34471	FL	Ocala	Marion	Main Office	Post Office		
New	11-6600	34480	FL	Ocala	Marion	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Ocala FL 34480 as last line of address for the 1,884 deliveries previously in ZIP Code 34471.
Old	11-6600	34474	FL	Ocala	Marion	Main Office	Post Office		
New	11-6600	34471	FL	Ocala	Marion	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Ocala FL 34471 as last line of address for the 4,209 deliveries previously in ZIP Code 34474.
Old	11-4770	32162	FL	Lady Lake	Sumter	Main Office	Post Office		
New	11-4770	32163	FL	Lady Lake	Sumter	The Villages	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use The Villages FL 32163 as last line of address for the brand new deliveries.
Old	11-5025	33467	FL	Lake Worth	Palm Beach	Greenacres	Classified Branch		
New	11-5025	33449	FL	Lake Worth	Palm Beach	Greenacres	Classified Branch	07/01/2007	Establish a new ZIP Code for a delivery area. Use Lake Worth FL 33449 as last line of address for 4,439 deliveries previously in ZIP Code 33467.
Old	11-0960	33437	FL	Boynton Beach	Palm Beach	Jog Road	Classified Branch		
New	11-0960	33472	FL	Boynton Beach	Palm Beach	Jog Road	Classified Branch	07/01/2007	Establish a new ZIP Code for a delivery area. Use Boynton Beach FL 33472 as last line of address for 7,967 deliveries previously in ZIP Code 33437.
Old	11-0960	33437	FL	Boynton Beach	Palm Beach	Jog Road	Classified Branch		
New	11-0960	33473	FL	Boynton Beach	Palm Beach	Jog Road	Classified Branch	07/01/2007	Establish a new ZIP Code for a delivery area. Use Boynton Beach FL 33473 as last line of address for 906 deliveries previously in ZIP Code 33437.
Old	11-9165	34286	FL	Venice	Sarasota	North Port	Classified Branch		
New	11-9165	34291	FL	Venice	Sarasota	North Port	Classified Branch	07/01/2007	Establish a new ZIP Code for a delivery area. Use North Port FL 34291 as last line of address for 2,105 deliveries previously in ZIP Code 34286.
Old	11-5190	33971	FL	Lehigh Acres	Lee	Main Office	Post Office		
New	11-5190	33976	FL	Lehigh Acres	Lee	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Lehigh Acres FL 33976 as last line of address for the 2,311 deliveries previously in ZIP Code 33971.
Old	12-2233	30040	GA	Cumming	Forsyth	Main Office	Post Office		
New	12-2233	30028	GA	Cumming	Forsyth	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Cumming GA 30028 as last line of address for the 8,678 deliveries previously in ZIP Code 30040.
Old	16-4680	60050	IL	Mchenry	Mchenry	Main Office	Post Office		
New	16-4680	60051	IL	Mchenry	Mchenry	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Mchenry IL 60051 as last line of address for the 4,216 deliveries previously in ZIP Code 60050.
Old	25-0680	49015	MI	Battle Creek	Calhoun	Main Office	Post Office		
New	25-0680	49037	MI	Battle Creek	Calhoun	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Battle Creek MI 49037 as last line of address for the 5,189 deliveries previously in ZIP Code 49015.

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
Old	25-0680	49017	MI	Battle Creek	Calhoun	Main Office	Post Office		
New	25-0680	49037	MI	Battle Creek	Calhoun	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Battle Creek MI 49037 as last line of address for 7,750 deliveries previously in ZIP Code 49017.
Old	30-9465	68068	NE	Washington	Washington	Main Office	Post Office	03/11/2005	
New	30-0930	68068	NE	Bennington	Washington	Washington	Place Name	04/28/2007	Post Office discontinued. Retain ZIP Code. Establish a Place Name. Continue to use Washington NE 68068 as last line of address.
Old	32-1890	03824	NH	Durham	Strafford	Main Office	Post Office		
New	32-1890	03861	NH	Durham	Strafford	Lee	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Lee NH 03861 as last line of address for the 1,685 deliveries previously in ZIP Code 03824.
Old	32-0840	03223	NH	Campton	Grafton	Main Office	Post Office		
New	32-0840	03285	NH	Campton	Grafton	Thornton	Place Name	07/01/2007	Establish a new ZIP Code for a delivery area. Use Thornton NH 03285 as last line of address for the 1,502 deliveries previously in ZIP Code 03223.
Old	33-2445	07726	NJ	Englishtown	Monmouth	Main Office	Post Office		
New	33-6570	08535	NJ	Perrineville	Monmouth	Millstone Township	Place Name	06/09/2007	Realign ZIP Code boundaries. Use Millstone Township NJ 08535 as last line of address for the 930 deliveries previously in ZIP Code 07726.
Old	33-2445	07726	NJ	Englishtown	Monmouth	Main Office	Post Office		
New	33-1590	08510	NJ	Clarksburg	Monmouth	Millstone Township	Place Name	06/09/2007	Realign ZIP Code boundaries. Use Millstone Township NJ 08510 as last line of address for the 138 deliveries previously in ZIP Code 07726.
Old	31-4883	89124	NV	Las Vegas	Clark	Seven Hills	Classified Station		
New	31-4883	89054	NV	Las Vegas	Clark	Seven Hills	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Sloan NV 89054 as last line of address for 44 deliveries previously in ZIP Code 89124.
Old	31-4883	89034	NV	Mesquite	Clark	Main Office	Post Office		
New	31-4883	89034	NV	Mesquite	Clark	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Mesquite NV 89034 as last line of address.
Old	31-7280	89506	NV	Reno	Washoe	Sierra	Classified Station		
New	31-7280	89508	NV	Reno	Washoe	Sierra	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Reno NV 89508 as last line of address for 4,649 deliveries previously in ZIP Code 89506.
Old	31-7280	89510	NV	Reno	Washoe	Main Office	Post Office		
New	31-8240	89441	NV	Sparks	Washoe	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Sparks NV 89441 as last line of address for the 650 deliveries previously in ZIP Code 89510.
Old	31-4883	89124	NV	Las Vegas	Clark	Main Office	Post Office		
New	31-6320	89040	NV	Overton	Clark	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Overton NV 89040 as last line of address for the 64 deliveries previously in ZIP Code 89124.
Old	31-4883	89124	NV	Las Vegas	Clark	Main Office	Post Office		
New	31-4883	89161	NV	Las Vegas	Clark	Westridge	Classified Station	07/01/2007	Realign ZIP Code boundaries. Use Las Vegas NV 89161 as last line of address for the 199 deliveries previously in ZIP Code 89124.
Old	35-9614	10021	NY	New York	New York	Lenox Hill	Classified Station		

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
New	35-9614	10075	NY	New York	New York	Lenox Hill	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use New York NY 10075 as last line of address for the 18,162 deliveries previously in ZIP Code 10021.
Old	35-9614	10021	NY	New York	New York	Lenox Hill	Classified Station		
New	35-9614	10065	NY	New York	New York	Lenox Hill	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use New York NY 10065 as last line of address for the 18,971 deliveries previously in ZIP Code 10021.
Old	38-1190	44021	OH	Burton	Geauga	Main Office	Post Office		
New	38-1470	44023	OH	Chagrin Falls	Geauga	Auburn	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Auburn Township OH 44023 as last line of address for the 385 deliveries previously in ZIP Code 44021.
Old	38-0364	44202	OH	Aurora	Portage	Main Office	Post Office		
New	38-1470	44023	OH	Chagrin Falls	Portage	Auburn	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Auburn Township OH 44023 as last line of address for the 54 deliveries previously in ZIP Code 44202.
Old	38-3612	44234	OH	Hiram	Portage	Main Office	Post Office		
New	38-1470	44023	OH	Chagrin Falls	Portage	Auburn	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Auburn Township OH 44023 as last line of address for the 39 deliveries previously in ZIP Code 44234.
Old	38-4858	44255	OH	Mantua	Portage	Main Office	Post Office		
New	38-1470	44023	OH	Chagrin Falls	Portage	Auburn	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Auburn Township OH 44023 as last line of address for the 352 deliveries previously in ZIP Code 44255.
Old	38-4858	44255	OH	Mantua	Portage	Main Office	Post Office		
New	38-1190	44021	OH	Burton	Portage	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use Burton OH 44021 as last line of address for the 2 deliveries previously in ZIP Code 44255.
Old	39-2719	73003	OK	Edmond	Oklahoma	Coffee Creek	Classified Station		
New	39-2719	73012	OK	Edmond	Oklahoma	Coffee Creek	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Edmond OK 73012 as last line of address for 3,735 deliveries previously in ZIP Code 73003.
Old	39-2719	73003	OK	Edmond	Oklahoma	Coffee Creek	Classified Station		
New	39-2719	73025	OK	Edmond	Oklahoma	Coffee Creek	Classified Station	07/01/2007	Establish a new ZIP Code for a delivery area. Use Edmond OK 73025 as last line of address for 1,867 deliveries previously in ZIP Code 73003.
Old	41-1280	17201	PA	Chambersburg	Franklin	Main Office	Post Office		
New	41-1280	17202	PA	Chambersburg	Franklin	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Chambersburg PA 17202 as last line of address for the 11,633 deliveries previously in ZIP Code 17201.
Old	45-3060	29715	SC	Fort Mill	York	Main Office	Post Office		
New	45-3060	29707	SC	Fort Mill	York	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Fort Mill SC 29707 as last line of address for the 4,464 deliveries previously in ZIP Code 29715.
Old	45-1480	29410	SC	Charleston	Berkeley	North Charleston	Classified Branch		
New	45-1480	29410	SC	Charleston	Berkeley	North Charleston	Classified Branch	07/01/2007	This announcement expands the use of ZIP Code 29410 to include delivery.
Old	45-1480	29406	SC	Charleston	Berkeley	North Charleston	Classified Branch		
New	45-1480	29410	SC	Charleston	Berkeley	Hanahan	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Hanahan SC 29410 as last line of address for the 5,166 deliveries previously in ZIP Code 29406.

Old/ New	Finance No.	ZIP Code	State	P. O. Name	County	Station/Branch/ Unit	Unit Type	Effective Date	Comments
Old	45-3440	29445	SC	Goose Creek	Berkeley	Main Office	Post Office		
New	45-1480	29410	SC	Charleston	Berkeley	Hanahan	Place Name	07/01/2007	Realign ZIP Code boundaries. Use Hanahan SC 29410 as last line of address for the 2,046 deliveries previously in ZIP Code 29445.
Old	48-3475	78628	TX	Georgetown	Williamson	Main Office	Post Office		
New	48-3475	78633	TX	Georgetown	Williamson	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Georgetown TX 78633 as last line of address for 7,590 deliveries previously in ZIP Code 78628.
Old	48-7805	78664	TX	Round Rock	Williamson	Main Office	Post Office		
New	48-7805	78665	TX	Round Rock	Williamson	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Round Rock TX 78665 as last line of address for 6,813 deliveries previously in ZIP Code 78664.
Old	48-7980	78258	TX	San Antonio	Bexar	Main Office	Post Office		
New	48-7980	78260	TX	San Antonio	Bexar	Main Office	Post Office	07/01/2007	Realign ZIP Code boundaries. Use San Antonio TX 78260 as last line of address for the 4,301 deliveries previously in ZIP Code 78258.
Old	51-8454	22553	VA	Spotsylvania	Spotsylvania	Main Office	Post Office		
New	51-8454	22551	VA	Spotsylvania	Spotsylvania	Main Office	Post Office	07/01/2007	Establish a new ZIP Code for a delivery area. Use Spotsylvania VA 22551 as last line of address for the 6,547 deliveries previously in ZIP Code 22553.