

NAHB Cluster Mailbox Toolkit

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Framing the Problem

Although door delivery to individual homes is still common in many parts of urban and suburban America, the most common form of delivery in suburban America is via a curbside mail receptacle, often accessed directly by mail truck. By contrast, multifamily communities, such as condominiums and garden apartments, have traditionally been serviced by a shared cluster box unit (CBU), either located in a building interior or at a common accessible site.

New single-family subdivisions often share characteristics with multifamily communities, including a mix of detached and attached units, shared amenities, commonly maintained open space, and restricted access points such as a gated community. Coinciding with this trend, the United States Postal Service (USPS) has seen reduced revenues because of competition from private express carriers, innovations in delivery services through online ordering, and dramatically oscillating fuel prices. These competitive pressures have caused the USPS to reduce curbside delivery as a cost-cutting measure.

How is the USPS Structured?

The USPS is an independent branch of the executive office of the U.S. government and is governed by a nine-member Board of Governors appointed by the president. The only congressional oversight is via the fact that the board member appointees are confirmed by the U.S. Senate. The board directs the exercise of the powers of the USPS, directs and controls its expenditures, reviews its practices, conducts long-range planning, approves officer compensation and sets policies on all postal matters.

The Board of Governors is not to be confused with the Postal Regulatory Commission, which is an independent oversight group appointed by the president. Its mission is to ensure transparency and accountability of USPS and to promote a robust universal mail system through objective, accurate and timely regulatory analyses and decisions and engagement with Congress and stakeholders. NAHB has determined that the USPS to date has been a highly decentralized operational system, with very little centralized policy dictating the day-to-day operations of the service, with the exception of the Postal Operations Manual. However, this may be changing in light of its current financial struggles and overall postal reform.

Federal Requirements and Resources for Mail Delivery Services

The USPS has determined that centralized delivery is generally the most cost-effective primary mode of delivery. However, this guidance has not been implemented uniformly across the country, as the USPS still grants discretion regarding delivery option decisions to regional managers and local postmasters, some of whom are still allowing curbside delivery without special exception.

The [USPS Postal Operations Manual \(POM\)](#), with most recent updates through January 2021, states the following:

Centralized delivery is the preferred mode of delivery for all new residential and commercial developments. Curbside, sidewalk delivery and door modes are generally not available for new delivery points, with very rare exceptions, as determined by the Postal Service in its sole discretion, on a case-by-case basis (Postal Operations Manual, Page 315).

Section 631 of the POM was revised in 2018 relating to modes of delivery. On centralized delivery, the POM further details:

Centralized delivery service is the preferred mode of delivery and may be provided to call windows,



horizontal locked mail receptacles, cluster box units (CBUs), wall-mounted receptacles, or mechanical conveyors (mechanical conveyors are only for high-rise and multiple-tenant buildings, and only if certain conditions are met; consult your postmaster for details).

- a. *Delivery requirements: CBUs and USPS STD 4C (wall-mounted) equipment may be approved for use at one or more centralized delivery points in a residential housing community or business location. The local postal manager or District designees must approve the mailbox sites and type of equipment. Boxes must be safely located so that customers are not required to travel an unreasonable distance to obtain their mail and to provide sufficient access to mailbox locations. Normally, it is appropriate for the receptacle to be within one block of the residence.*
- b. *Centralized delivery addresses: Centralized delivery mail receptacles (including USPS STD 4C equipment and CBUs, delivery centers, and postal centers) must be identified by the same addresses as the dwellings for which they serve as mail receptacles. The respective, conforming addresses should be displayed inside the boxes and visible only to the carrier and customer when accessing that receptacle. USPS does not assign addresses; however, the sequential ordering of any centralized delivery equipment is subject to USPS approval for operational efficiency and to accommodate special circumstances or requests for hardship delivery. For security or privacy, mailer associations or customer groups may use another alphanumeric identification system on the outside of receptacles that is not part of, or used in, the mailing address. (Postal Operations Manual, Page 316)*

More information, including standards for curbside, sidewalk and door delivery can be found in the POM, section 63: Modes of Delivery, Mail Receptacles, and Keys.

The local postal manager must approve both the mailbox sites and type of equipment. Customers will not receive mail delivery service until the units and locations are approved by the local postal management and the mail receptacles are installed.

USPS Builders and Developers Guide

The [U.S. Postal Service National Delivery Planning Standards: A Guide for Builders and Developers](#), published in 2017, is designed to provide structure and support to developers and builders on delivery issues surrounding the establishment or extension of delivery service. The document states that builders and developers or property owners are responsible for the purchase, installation, maintenance, repair and replacement of mailbox equipment.

Builders and developers must meet with their local USPS Growth Coordinator or representative early in the development planning phase (i.e., before they finalize plans and site plats with the appropriate planning/zoning authorities), so that the most efficient and effective delivery methods for customers can be established. To contact the local Growth Coordinator, builders and developers should email Delivery.Growth@usps.gov.

Strategies for NAHB Members and Associations

Although the POM outlines the general procedures to be followed by developers going forward, it lacks detail on how to deal with grandfathering projects currently in the development pipeline, projects caught mid-phase, maintenance and replacement in communities that lack a home owners association (HOA), dealing with the municipal approvals process, etc.

As mentioned previously, the USPS is a highly decentralized organization, and much of the policy decision-making will derive from the regional postmaster, with guidance from such centralized policy as the POM. It is, therefore, critical to establish a relationship with this office. Discussing mailbox type and location and obtaining approval before construction begins is critical to making sure customers receive their mail in a timely manner.



It can also be beneficial to invite the postmaster to conduct an information session with local developers and builders, where they may express concerns and ask questions. When talking with the postmaster, consider raising these issues:

- **Multiple-phased projects:** Occasionally, there have been multiphase projects that were approved for curbside delivery and are now being told they need to install cluster mailboxes for later phases. In these cases, it is important to meet with your Growth Management Coordinator to determine a plan for legacy inclusion in these later phases.
- **Security:** Issues such as lighting and crime in remote or isolated areas or areas with higher-than-average criminal activity. Curbside delivery reduces these risks by providing mail at or very near a person's residence.
- **Access:** Other considerations are access for the elderly and persons with disabilities. This should especially be a consideration for 55+ communities, where there may be many residents who will need to apply for hardship waivers, and the requirement to reapply every year will be onerous.
- **Maintenance:** Maintenance of the structure over time will be critical, not only for the aesthetic quality of the residential subdivision, but also the viability of the unit and any accompanying structure. In subdivisions that lack an HOA to manage them after a developer transitions responsibility to the HOA, it is as yet unclear who has the responsibility for maintenance. An alternative to propose would be allowing double or triple curbside mailbox posts for subdivisions that lack an HOA.

Frequently Asked Questions (FAQ)

I installed curbside mailboxes in my development because I didn't know I needed to install a mode of centralized delivery. What happens now?

In the event an improper mode of delivery is established or extended by a postal carrier or manager, the service will be withdrawn with a 30-day advance notice to the affected customer(s), provided that the error is detected, and the customer is notified within one year. If the error is not detected and the customer is not notified within one year of the date delivery is established or extended, the improper service remains in place unless the customer consents to the delivery mode change or a delivery point with improper modes of delivery in a vacant delivery is first identified during the vacant period per POM section 623.5.

If a customer refuses to accommodate the USPS' delivery mode determination by refusing to provide an approved mail receptacle, General Delivery service may be provided at the nearest postal facility where the carrier delivery emanates or where may be otherwise available to the customer.

Whose responsibility is it to purchase, install and maintain the centralized mailboxes?

Purchase, installation and maintenance of mail receptacles are the responsibility of the customer per POM section 632.11 Responsibilities.

It is the responsibility of the developer or builder to maintain the units and the associated infrastructure until the development is turned over to an HOA. In the absence of an HOA, it is still unclear who has the responsibility for maintenance.

Who decides the location of the centralized units?

Appropriate locations for installation should be verified with local postmasters. The POM notes that there is no



municipal authority for the approval of unauthorized centralized delivery equipment or centralized delivery systems. The U.S. Postal Service National Delivery Planning Standards A Guide for Builders and Developers includes multiple examples of how to site the units.

What if I am building a home on an infill lot in a neighborhood that has door, curbside or sidewalk delivery?

POM section 631.51 Extension of Service within an existing block states that new deliveries built or established within a block of existing deliveries can only receive the same type of service as the older deliveries, subject to postmaster approval and after consideration of USPS operational efficiencies.

What about residents who are elderly or handicapped and cannot walk or drive to the cluster mailbox?

POM section 631.52 Hardship Cases states that changes in the mode of delivery will be considered where service by existing methods would impose an extreme physical hardship on an individual customer. Any request for a change in delivery mode must be submitted in writing. Each request for a change in delivery service should be evaluated based on the customer's needs; a request should not be denied solely because of increased operational costs or because a family member or other party may be available to receive mail for the customer. Hardship requests must be renewed annually by the customer and approved by the postmaster.

What if my development is in a rural area and the lots are spread far apart?

This scenario may also fall under POM section 631.52 Hardship Cases. However, rural delivery customers requesting a hardship extension must also meet current criteria for extension of rural delivery service.

What happens if my request for alternate mode due to hardship is denied?

If the local postmaster denies a request, the request must be sent to the district for review. The final decision is made by the district manager.

My customers are having problems obtaining keys for their centralized units. What are the procedures regarding locks and keys?

The USPS is responsible for providing every customer a compartment lock and three keys to his or her postal-owned CBU. Customers may duplicate their keys if they choose; however, if all of the keys are lost, the USPS will need to install a new lock at the customers' expense.

When new centralized delivery equipment is installed, the keys may either be taped to the inside of the receptacle until the compartment is issued or stored at the post office. The builder or property owner is responsible for providing lock and key service for privately owned CBUs.

Where can I find more information?

- [NAHB's Cluster Mailboxes](#)
- [NAHB Cluster Box Unit Mail Delivery Resolution](#)
- [NAHB Expresses Concerns Over Cluster Mailboxes](#)

