

REGIONAL MANAGEMENT INC.

REGIONAL MANAGEMENT, INC. TESTIMONY HB 1274 UNFAVORABLE

Regional Management, Inc. (RMI) is a property management company which has, for over 60 years, managed over 5,000 units of affordable, market rate, residential properties in Baltimore City and County. It is a founding member of the Maryland Multi Housing Association.

A DC CV 115 Form is mandated to be sent to each delinquent tenant of a Housing Provider 10 days before a filing of a Failure to Pay Rent (FTPR) action may be filed with the Court.

The law mandates that the form must be sent to the tenant in various ways but if mailed, it must be sent with a U.S. Postal Service Certificate of Mailing, First Class.

What is a Certificate of Mailing you ask? As the US Postal Service states:

"A Certificate of Mailing provides evidence that you sent an item when you say you did. The Postal Service® does not keep copies of Certificate of Mailing receipts. It is therefore critical that you retain your receipt."

Correspondence sent with a Certificate of Mailing is delivered to the recipient's door or mailbox like any other first class mail. It also provides the Landlord with proof that the correspondence was mailed, making them responsible for keeping a record of the transmittal. (See attached procedures and forms)

This Bill's requirement that a Landlord must include evidence ***in their FTPR complaint*** is not only cumbersome it is highly problematic for Multi Family Housing Providers as they are considered to be "Firm" Users of the Certificate of Mailing process, and as the forms attached to this testimony indicate, separating each individual Tenant's 115 Form to be added to the FTPR form would be impossible.

If the Court is concerned as to whether the 115 Form was properly delivered it is up to the Housing Provider to have that information at the ready at trial and if that fails the Court will rule accordingly. Additional paper in this matter is unnecessary.

Accordingly, RMI requests an Unfavorable report.

Respectfully Submitted;
Katherine Kelly Howard, Esq., General Counsel

Individual
owner



Certificate Of Mailing

To pay fee, affix stamps or meter postage here.

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing. This form may be used for domestic and international mail.

From:

To:

Postmark Here



Certificate of Mailing — Firm

Name and Address of Sender

TOTAL NO. of Pieces Listed by Sender

TOTAL NO. of Pieces Received at Post Office™

Affix Stamp Here
Postmark with Date of Receipt.

Postmaster, per (name of receiving employee)

USPS® Tracking Number Firm-specific Identifier	Address (Name, Street, City, State, and ZIP Code™)	Postage	Fee	Special Handling	Parcel Airtiff
1.					
2.					
3.					
4.					
5.					
6.					

Instructions for Certificate of Mailing — Firm

This service provides evidence that the mailer has presented individual items to the Postal Service™ for mailing, and is available for the following products:

- Domestic services: First-Class Mail®, First-Class Package Service®, Priority Mail®, Media Mail®, Library Mail, Bound Printed Matter, Merchandise Return Service, Parcel Return Service, and USPS Retail Ground™.
- International services: First-Class Mail International® (unregistered items), First-Class Package International Service® (unregistered items), Free Matter for the Blind, and Airmail M-bags®.

The following instructions are for the preparation and use of PS Form 3665, *Certificate of Mailing* — Firm (including USPS-approved facsimiles):

1. Complete and print all forms in ink or ball point pen.
2. Enter the name and address of the sender at the top of the form.
3. Enter a complete return address on each article.
4. Ensure the articles are properly packaged.
5. In the appropriate column, enter the applicable postage and fees.
6. Insert a firm-specific identifier or account number if desired. (This number is for the sender's use only, and the Postal Service will not use it for identification.)
7. When describing and listing three or more individual pieces but not presenting the pieces in the order shown on the sheet, consecutively number each entry line on the sheet and number each piece to show both the corresponding sheet and line number.
8. Enter the total number of articles in the proper space at the top of the form.
9. Obliterate all unused portions of the "Address" column by drawing a diagonal line through the unused portion on the form.
10. When the number of articles presented exceeds the allotted space on the form, use multiple sheets, and in the provided blank spaces in the lower left of the form, number them consecutively to show sheet number and total number of sheets (such as "Page 1 of 4," "Page 2 of 4," etc.).

11. Present PS Form 3665 and the mailing as follows:

- When the mailing has fewer than 50 mailpieces and less than 50 pounds, present the form and mailing at a retail Post Office™ location.
- When the mailing has at least 50 mailpieces or at least 50 pounds, present the form and mailing at a business mail entry unit (BMEU) or USPS-authorized detached mail unit (DMU).

Privately Printed Forms: The Postal Service allows mailers to use USPS-approved privately printed or computer-generated firm sheets that are nearly identical in design elements and color to the USPS-provided PS Form 3665. See DMM 503 for details on the approval process.

The mailer must retain the original written approval granted by the Postal Service as evidence that the privately printed facsimile of PS Form 3665 has been approved by the Postal Service. The Postal Service does not retain records on the facsimile approvals. A mailer using privately prepared forms must periodically verify them against the USPS-provided version and, if necessary, make routine updates and obtain approval of the updated facsimile form.

A mailer using an approved privately printed form and wanting the form sheets postmarked by the Postal Service must present the forms with the articles to be mailed at a Post Office facility. The forms become the mailer's only receipt (the Postal service does not retain a copy).