

## Support HB 3588: Small Business Registration Efficiencies

### The Issue:

Co-working businesses exist to provide a valuable service to the business community across Oregon. Access to professional workspaces and meeting spaces are essential for remote workers, small businesses and entrepreneurs, as the nature and locations for work has changed.

Recent federal regulations require co-working businesses that receive mail for their members to register as a Commercial Mail Receiving Agency (CRMA). The USPS Domestic Mail Manual, effective 2023, amended the definition of Commercial Mail Receiving Agency<sup>1</sup> to include:

*An office business center (OBC) is a business that operates primarily to provide private office facilities and other business support services to individuals or firms (customers). OBCs receive single-point delivery. OBCs are considered CMRAs for Postal Service purposes and must comply with the requirements in 1.8.*

A single-point delivery refers to the delivery of mail from a USPS employee to a single, official mail receptacle, such as mail slot or a secure mailbox. The USPS interprets this rule to mean that any business that receives mail at a single point for multiple individuals or firms is a Office Business Center by definition, and must register as a CMRA enforceable by law.

### The Problem:

Many commercial business arrangements have single point delivery from the USPS which are not traditionally Commercial Mail Receiving Agencies, including co-working businesses. Current Oregon law requires that businesses cannot supply a CMRA address as a place of business for registration purposes.

Since co-working businesses are compelled to comply with the USPS CMRA regulations, and classified as a CMRA by the state, co-working members which are individual businesses are prevented from filing and renewing their state licenses.

### The Solution:

We support an amendment to exempt non-traditional CRMAs, such as co-working businesses and allow them authority to use their physical addresses as a place of business for their members.

Understanding the intent of the underlying state regulations<sup>2</sup> is to curb shell companies registering in the state of Oregon to pursue criminal enterprises, non-traditional CRMAs are already required to maintain detailed records on the identity of their members and to support investigation of potentially fraudulent activities via Form 1583.

Please support HB 3588 as it will preserve the intent of the underlying law, while allowing non-traditional CRMAs to provide a value service to small businesses across the state.

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<sup>1</sup> <https://pe.usps.com/text/dmm300/508.htm>

<sup>2</sup> Oregon Laws 2017, chapter 705