



July 10, 2007

Art Sackler
Senior Counsel/Government Affairs
The Kellen Company
1156 15th St NW Ste 900
Washington DC 20005-1717

Dear Mr. Sackler:

This letter is in response to your recent request for an advisory opinion on the mailability of devices commonly known as "bump keys."

Domestic Mail Manual (DMM) 601.11.10.4a and b define a locksmithing device as "A device or tool (other than a key) designed to manipulate the tumblers in a lock into the unlocked position through the keyway of such lock" or "A device or tool (other than a key or a device or tool under 11.10.4a designed for bypassing a lock or similar security device, or for opening it by a method normally not used by consumers to open such locks or security devices."

Locksmithing devices, as defined above, are considered to be nonmailable material unless sent to any of the following persons or organizations listed in DMM 601.11.10.5:

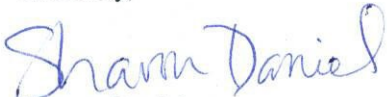
- a. Lock manufacturer or distributor.
- b. Bona fide locksmith.
- c. Bona fide reposessor.
- d. Motor vehicle manufacturer or dealer.
- e. Bona fide automotive repair shops or businesses.

For postal purposes, a key is considered to be the device commonly understood and considered by the public to be used for the purposes of opening or closing a lock. In this matter, that is to say that a key is a device shaped, designed, configured, and intended to operate a single lock by inserting it into a keyway and turning it in the manner familiar to the average consumer.

Bump keys are not designed or intended for use with a single lock, nor are they used in a manner that is familiar to consumers. The design of a bump key is intended to allow the device to pass into the keyway of a lock and, through an unusual process of striking the device while turning it, manipulate the tumblers of the lock into the open position. As such, bump keys and similar devices fall into the category of locksmithing devices and are generally considered to be nonmailable except in those limited circumstances listed in DMM 601.11.10.5.

Should you have any questions about this request, please contact Michael Lee of my staff at (202)268-7263.

Sincerely,

A handwritten signature in blue ink that reads "Sharon Daniel". The signature is written in a cursive, flowing style.

Sharon Daniel
Manager

cc: Manager PCSC

P&C:MS:DMM601.11.10