

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

**DIRECT TESTIMONY
OF
PETE GORMAN
ON BEHALF OF THE
SATURATION MAILERS COALITION**

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1 DIRECT TESTIMONY OF PETE GORMAN

2 BIOGRAPHICAL SKETCH

3 I am Peter E. (Pete) Gorman, President of Harte-Hanks Shoppers and Executive
4 Vice President of Harte-Hanks, Inc. The Harte-Hanks Shoppers, North America's
5 largest publisher of advertising shoppers, publishes over 1,085 zoned editions reaching
6 over 13 million households each week in California and South Florida.

7 I joined the PennySaver, Harte-Hanks' California shopper, in 1979 as a regional
8 sales manager, and then served in numerous sales, marketing, and general
9 management positions. I was promoted to President of the Southern California unit in
10 1992, and President of Shoppers and Senior Vice President of Harte-Hanks, Inc. in
11 1996. In 2005 I was named Executive Vice President of Harte-Hanks, Inc.

12 Prior to joining Harte-Hanks, I spent ten years in sales and management with
13 Hilti, Inc. I hold a bachelor's degree in psychology from Parsons College in Fairfield,
14 Iowa. In addition I have done graduate work at the University of Tennessee and
15 completed the Program for Management Development at the Harvard Business School.

16 I am a past member of the Board of Directors of the Association of Free
17 Community Papers. I remain active in industry affairs, having served on the steering
18 committee of the Saturation Mailers Coalition since its formation in 1997.

19 PURPOSE OF TESTIMONY

20 The Postal Service has proposed a major restructuring of rates for ECR
21 saturation flats, introducing a 1.5-cent differential between mailings that use lower-cost
22 "on-piece" addressing and the higher-cost detached address label (DAL) addressing
23 option. The purpose of my testimony, on behalf of the SMC, is to explain the critical

1 implications of that proposal on our industry and to describe an alternative addressing
2 option we have presented to the Postal Service. We as an industry have been
3 advocating to the Postal Service the creation of a rate differential for DALs as an
4 incentive for mailers to convert to lower-cost addressing methods and reduce USPS
5 cost, *but coupled with* an alternative addressing method on city delivery routes – which
6 we have called “simplified but certified” addressing – that will give mailers who cannot
7 otherwise convert to “city-style” addressing a viable alternative to avoid the surcharge
8 and reduce USPS costs. The Postal Service’s proposal includes only the former, a rate
9 surcharge, a shortcoming that we believe must be rectified.

10 I will explain how many mailers including Harte-Hanks have built their operations
11 and products around the DAL procedure which allows them to separate the addressing
12 and mail production operations, a critical factor given the tight production deadlines that
13 are imposed by the highly-competitive nature of our marketplace. I then describe the
14 difficulties and risks we all face in re-tooling our companies to convert to “on-piece”
15 addressing of our mail pieces, and the consequent need for a “simplified but certified”
16 addressing alternative.

17 Simplified addressing is currently allowed on rural routes. In anticipation of
18 concerns some might have about its extension to city routes, and because the need for
19 a simplified alternative arises solely because of the Postal Service’s operations- and
20 cost-driven decision to encourage mailers to convert from DALs, we have urged the
21 Postal Service that the simplified option (if adopted) be limited to saturation flat mailings
22 with a mailing frequency of twelve or more times a year, and subject to the requirement
23 that the mailer maintain a certified mailing list.

1 Finally, I address the great uncertainty the DAL transition presents to our
2 industry, and the consequent need for extreme caution in considering departures from
3 the Postal Service's proposed rates for ECR saturation flats.

4 I. THE SATURATION MAILERS COALITION AND OUR INDUSTRY

5 The Saturation Mailers Coalition (SMC) was formed in 1997, with Harte Hanks as
6 one of its charter members, to represent the broad interests of the saturation mail
7 industry on postal matters, including not just postal rates but also regulations and other
8 issues that affect the industry. The SMC's membership includes companies that
9 produce "shopper publications," shared mail programs, magazine- and newspaper-type
10 free papers, and letter "coupon envelopes," all of which use ECR saturation mail for
11 delivery of their advertising programs to households. For all of us, postage and mail
12 preparation to satisfy postal requirements represent a large portion (20% to 50%) of our
13 gross sales revenue.

14 The common denominator within the SMC is the assimilation and distribution of
15 advertising matter from numerous retailers, service companies, and entrepreneurs for
16 mailings to consumer households, typically targeted by zip code in a manner that allows
17 each advertiser to select and reach potential customers within their unique service
18 areas, often within a few-miles' radius of their business locations.

19 Another common denominator is that within the SMC, our members compete, in
20 varying degrees, with each other for a slice of the advertising business. This is why, in
21 developing positions on postal issues, the SMC has always strived to take a balanced
22 look at the broad interests of the industry as a whole, recognizing that in the long run a

1 healthy Postal Service and a viable postal rate and regulatory framework are in the best
2 interests not only of the industry but of our individual mailer members.¹

3 Shopper publications and shared mail programs operate in the most highly
4 competitive arena of any type of mail. We compete directly among ourselves and with
5 newspapers and others for distribution of preprinted advertising circulars. Our preprint
6 advertising customers are themselves highly price- and service-sensitive, and because
7 their preprints can be readily distributed either by mail or non-postal alternatives without
8 any change in format, price is often the decisive factor in their choice of media. In the
9 case of shopper publications, we also face the same challenges as the newspaper
10 industry in competing for classified advertising against the growing inroads of internet
11 alternatives. This is why maintaining affordable and competitive postal rates has always
12 been of critical importance to our industry.

13 Another feature of our industry is the availability and feasibility of private delivery.
14 More than half of all shopper publications in the nation are delivered privately, outside
15 the mailstream. Private delivery is also an option that is used for distribution of shared
16 mail programs. While SMC's members predominately use the mail, the bottom line on
17 our distribution choice is our bottom lines. We must remain competitive to stay in
18 business, and if postal delivery becomes unaffordable or unsuited to our needs, we will
19 have no choice but to pursue alternatives.

20 Saturation mailers also have alternatives short of a wholesale switch to private
21 delivery. Although we compete fiercely with newspapers, there are a growing number

¹ In this proceeding, for example, the SMC supports Postcom's proposal to increase the maximum weight for automatable letters, as presented in the testimony of Godfred Otuteye, President of Money Mailer, a member of SMC.

1 of markets where saturation mailers have partnered with newspapers to offer
2 advertisers joint “total market coverage” or “TMC” distribution, melding the low-
3 distribution-cost advantage of newspaper carrier distribution to newspaper subscribers
4 with the total market reach of mail distribution to nonsubscribers at ECR “high-density”
5 postal rates -- programs which have had the effect of pulling volumes out of the
6 mailstream.

7 In short, remaining competitive on both price and service is paramount to our
8 industry, and these in turn are dictated primarily by postal rates, requirements, and
9 service.

10 II. SMC’S POSITION ON THE PROPOSED DAL SURCHARGE

11 A. The Evolution of the DAL Addressing Procedure.

12 The detached address label procedure for saturation flats was
13 implemented about twenty-five years ago through the cooperative efforts of mailers and
14 the Postal Service to find an addressing alternative that was mutually beneficial,
15 improving postal efficiency in handling our mail and maintaining walk sequence
16 sortation while facilitating our own mail production operations. Over the ensuing years,
17 most mailers in our industry including Harte-Hanks have literally built their companies
18 around the DAL addressing procedure. For reasons I discuss in more detail later, DALs
19 facilitate the time-critical production of our mail pieces and enable mailers to meet
20 customer expectations on lead times and timely in-home delivery, crucial factors in
21 remaining competitive. The DAL procedure has been a contributor to the growth and
22 success of our industry’s mail programs, and has thereby helped to generate significant

1 revenues and contributions to the Postal Service's institutional costs: a mutual benefit
2 for the Postal Service and our industry.

3 Over the last five or so years, however, we have become increasing aware that
4 changes in postal operations including letter automation and casing methods have
5 eroded the benefits of DALs, and that the Postal Service has been looking for ways to
6 mitigate DAL costs, even considering the potential elimination of DALs as an addressing
7 option at some point in the future. Our choice as an industry was either (1) to cling to
8 the DAL procedure as long as possible and pay increasingly higher postal rates that
9 reflected the underlying costs of DALs, with no assurance of its long-term continuance;
10 or (2) to seek a proactive solution, in cooperation with the Postal Service, that would get
11 the industry ahead of the curve and give mailers addressing alternatives to DALs and
12 an incentive to convert to less costly procedures – reducing Postal Service costs and
13 laying the foundation for lower rates over the long term that will ensure the viability of
14 our mail programs – to the mutual benefit of our industry and the Postal Service.

15 B. SMC's Advocacy of an Alternative to DALs.

16 We have opted for the proactive solution, one that carries substantial risk
17 for the industry but that we believe is an imperative. For the past five years, the SMC
18 has been actively promoting, both within the industry and with the Postal Service, a new
19 two-part alternative to the current DAL procedure that would create:

- 20 1. A rate incentive for DAL mailers to convert to lower-cost addressing
21 procedures, thereby reducing Postal Service costs; *and, importantly*
- 22 2. An on-piece addressing alternative to DALs on city delivery routes –
23 “simplified but certified” – for DAL mailers who are not able or cannot
24 afford to convert to on-piece “city-style” addressing.

1 The second part of the SMC’s approach is of critical importance to many mailers
2 in our industry. Currently on city delivery routes, the only “on-piece” addressing format
3 that the USPS permits for *commercial* mailings is “city-style” addressing, such as “123
4 Elm Street.” On rural routes, by contrast, simplified addressing to “Postal Patron” has
5 been permitted for well over half a century.²

6 The SMC’s tandem approach – a rate incentive for conversion to on-piece
7 addressing coupled with a “simplified but certified” addressing alternative for DAL
8 mailers – is the ideal “win-win” solution for our industry and the Postal Service. It will:

- 9 • Provide a rate incentive for mailers to undertake the costly and
10 complex conversion from DALs to on-piece addressing;
- 11 • Give DAL users a practical and feasible simplified addressing
12 alternative to DALs;
- 13 • Maximize mailer conversion away from DALs and thereby
14 maximize USPS cost savings; yet
- 15 • Allow current DAL mailers who, of their own volition, want to
16 continue mailing DALs to do so, at the higher DAL rate.

17 This solution will maximize not only conversion and USPS cost saving, but
18 addressing choices for mailers. Those who *can and want* to convert to on-piece “city-
19 style” addressing may do so. Those who *cannot* convert to “city style” addressing will
20 have the option of “simplified but certified” addressing as a means of avoiding an
21 unnecessary surcharge. *All* mailers in the industry will have a means to convert from
22 DALs if they so choose. Yet any mailer who, for marketing or other reasons, wishes to
23 continue using DALs at the higher rate may do so. No mailer will be *forced* to pay a

² I would note that simplified mail *is currently permitted even on city routes*, but is restricted to saturation mailings by federal, state and local governments; political mailings; and the Postal Service’s own mailings such as promotions of its services and products, and notices of holiday station hours and mailing schedules.

1 surcharge for which it has no feasible means to avoid. Maximum choice for mailers.
2 Maximum cost saving for the Postal Service.

3 The industry, in advocating fundamental changes in the way mailers have
4 been conducting their business for decades, has taken a huge risk. The changes truly
5 are epic. We have done so for two reasons:

6 First, we understand that maintaining “business as usual” with respect to DALs is
7 not in the best long-term interest of the industry or the Postal Service. Both the industry
8 and the Postal Service need to work together, cooperatively, and in conjunction with the
9 Postal Rate Commission where needed, to get costs out of the system.

10 Second, we have pressed the companion element of our proposal – the
11 “simplified but certified” addressing option – in the good faith belief that it is essential to
12 minimizing harm to some mailers in the industry and to maximizing postal cost savings.
13 The benefits are not confined to the cost side of the equation. This option, by giving all
14 mailers addressing alternatives that allow them to convert from DALs, will ensure a
15 healthier, more vibrant saturation mail industry in the long run.

16 If the Postal Service truly wants to reduce the number of DALs in the system to
17 minimize its costs, a surcharge *alone* will not accomplish that objective. Instead, it will
18 merely penalize those mailers who are unable to convert to “city-style” addressing.
19 That, in turn, will likely cause volume and revenue losses for the Postal Service due to
20 mailers cutting back on circulation to offset higher postage or losses, or switching to
21 private delivery alternatives. We fail to see how that is in the interest of the Postal
22 Service. It certainly is not in the industry’s interest.

1 III. THE DIFFICULT TRANSITION FROM DALs TO ON-PIECE ADDRESSING

2 A. Importance of DALs to Mailer Operations

3 The DAL addressing procedure has been the cornerstone of the
4 operations and mail programs of many SMC members. The necessity and value of
5 DALs to saturation mailers are driven by marketplace and postal requirements.

6 Our preprint advertising customers, such as grocers and retail stores, demand
7 and expect a "late cutoff" for delivery of their preprints to our plants, minimizing the time
8 between finalization of their product and price offerings and the delivery of their
9 preprints to households. If we are not able to accommodate their schedules and
10 deadlines, they have attractive distribution alternatives: newspapers and private
11 delivery. The entirety of our mail production and operations is necessarily geared
12 around this constraint. Time is of the essence if we want to remain competitive.

13 Postal requirements also place time constraints on our production. We must
14 ensure that our mailings are presented to the Postal Service in walk-sequence order.
15 The method of addressing thus becomes critical.

16 That is why the DAL procedure became so important to our industry. The DAL
17 separates the addressing function from the rest of our production operations. DALs can
18 be produced and addressed (in walk sequence) well in advance of our time-critical
19 preprint insertion and production operations. Eliminating the need to place sequenced
20 addresses on our mail pieces greatly simplifies and speeds the task of inserting
21 advertising preprints into the finished product. Mailers employ high-speed production
22 lines that insert multiple preprint advertising pieces inside their main wrap product -- a
23 shopper publication in the case of companies like Harte-Hanks or an outside advertising
24 wrap in the case of shared mail programs. With the addressing separated, production is

1 faster and more reliable, with fewer chances of errors that might jeopardize critical
2 dispatch times and in-home delivery dates.

3 B. Difficulty and Risks of Conversion from DALs to On-Piece Addressing

4 Conversion from DALs to on-piece addressing will be a challenging and
5 expensive undertaking. The DAL procedure works for mailers because it separates the
6 addressing function from the highly complex and time-sensitive preprint-insertion
7 production function of producing the unaddressed flats. By contrast, a switch to on-
8 piece city-style addressing of the flats will fundamentally alter production operations at
9 substantial expense and risk:

10 (1) Mailers will have to make substantial investments to install in-line printers
11 and controllers at the end of each inserter production line. This is more than just a
12 capital cost. The printers will add a "critical failure point" in our production that does not
13 exist today. Because a printer malfunction would halt production and jeopardize our
14 tight schedules, high-level maintenance and backup systems will become a necessity.
15 But the purchase and installation of printers is, comparatively, the easy part. The more
16 problematic part is the effect this new printing function will have on our overall
17 operations and production, and on other aspects of our businesses.

18 (2) Injecting the printing operation at the end of the line will slow down our
19 production lines which currently run at or near full speed to meet our deadlines. In
20 addition to slowed lines, we will have to allow time to rectify errors in the printing and
21 bundling functions which might cause walk-sequence problems and thereby jeopardize
22 eligibility for walk-sequence rates, problems that do not exist for our current
23 unaddressed flats. We do not have the luxury of telling our time-sensitive preprint

1 advertisers to deliver their preprints to us earlier to accommodate our slowed
2 production; they have competitive alternatives and can readily switch to newspaper
3 distribution. That means we will have to extend our shifts and add additional production
4 personnel, or more likely, have to invest in additional production lines and staff. That
5 presents another problem since our existing plants have limited floor space for new
6 production lines, raising the specter of having to expand or upgrade our facilities.

7 (3) Mailers will have to reformat their shoppers or shared mail wraps to allow
8 space for postal indicia and an address on the outside of the piece. In addition, mailers
9 that use the front of DALs to promote causes such as the Missing Child Program will, if
10 they wish to continue their support, have to further reformat their products to make room
11 for those programs. These changes will cut into available prime advertising space.

12 (4) Mailers will lose revenue from advertising that currently appears on the
13 back side of DALs. While some of this advertising may be recaptured for placement
14 inside the addressed mail pieces, mailers will nevertheless face a substantial revenue
15 risk from eliminating DALs.

16 (5) This complex transformation of production, processes, and products
17 cannot be accomplished quickly. Mailers will have to start making investments and
18 taking steps well in advance in order to have the new equipment, procedures, and
19 products fully tested and up and running when new postal rates – and specifically the
20 DAL surcharge – become effective next year. This urgency itself can add costs to the
21 transition process.

22 For these reasons, the true financial impact of the Postal Service's rate proposal
23 on mailers who convert from DALs to on-piece addressing will be far greater than its

1 rate schedule might suggest. In order to qualify for the proposed (addressed) flat rate,
2 we must incur additional investment and operating expenses coupled with revenue
3 dilution that could be several times greater than the putative postal rate increase.

4 What I have described above applies to mailers who will ultimately be able, at
5 substantial cost and effort, to make the crossover. For many DAL mailers, however,
6 conversion to “city-style” on-piece addressing is impractical and would greatly disrupt
7 their business models and operations, particularly for those DAL mailers that do not do
8 their own production but use outside printers or mail houses. Our members have
9 different business reasons for the way they do business, and face differing challenges in
10 adapting to the Postal Service’s proposal. For many, conversion to “city-style” on-piece
11 addressing is not cost-effective or workable. Proposing solutions that give mailers
12 choices and work for the industry, and the Postal Service, is the key reason why the
13 SMC has been pressing for a “simplified but certified” addressing alternative on city
14 routes.

15 IV. THE NEED FOR CAUTION IN CONSIDERING DEPARTURES FROM THE
16 USPS PROPOSED RATES

17 This is a daunting time for our industry. The SMC supports the Postal Service’s
18 proposed rates for ECR saturation flats, including the DAL surcharge (although many
19 mailers also need the simplified addressing alternative), because we believe these rates
20 strike a careful balance and are needed for stability within our industry both in the short
21 and longer terms as we adapt to the “brave new world” of on-piece addressing.
22 Departures from that proposal, however, could have seriously damaging or near
23 disastrous consequences for segments of our industry or the entire industry, and the
24 Postal Service as well.

1 Any reduction in the proposed 1.5¢ surcharge, for example, could cause severe
2 harm and chaos within the industry due to the high cost, difficulty, and lead time
3 involved in converting to on-piece addressing. Mailers who have decided to convert
4 from DALs to on-piece “city-style” addressing must begin gearing up soon (if not
5 already) to make the conversion at considerable cost. Other mailers who are
6 contemplating conversion are doing so based on the assumption of an expected 1.5¢
7 rate differential. It is a critical part of the calculus in deciding whether to undertake the
8 conversion.

9 Indeed, given the long lead-time required for conversion, *any* mailer who wants
10 to convert to avoid the surcharge must spend the money and completely re-tool its
11 operations *even before the Postal Rate Commission has issued its recommended*
12 *decision, not knowing until too late what the rates will be.*

13 For a businessman, this presents a potential nightmare scenario. In the private
14 sector, businesses contemplating such fundamental changes with vendors or suppliers
15 can negotiate and set their prices and terms in advance of the transformation. I fully
16 understand that this dilemma is due to the regulatory structure governing postal rates
17 and not the fault of the Commission, but that knowledge does not lessen the anxiety. It
18 is, however, a factor that I believe the Commission must take into account in reaching
19 its decision.

20 Similarly, the Commission should refrain from increasing the proposed 1.5-cent
21 surcharge or the currently proposed rates for mailers who are not able to convert. The
22 proposed surcharge provides adequate incentive, and any higher rates would be
23 harmful.

1 V. THE SMC'S "SIMPLIFIED BUT CERTIFIED" ADDRESSING PROPOSAL

2 The SMC has proposed to the Postal Service a "Simplified but Certified"
3 addressing option which would allow simplified addressing for saturation program flats
4 on city routes, subject to conditions. We recognize that a decision to extend simplified
5 addressing from rural to city delivery routes is a Postal Service operational
6 determination outside the Commission's control. And we are also aware that the notion
7 of simplified mail might cause concern in some quarters.

8 Our simplified addressing proposal is not something intended to radically
9 transform the mailing business. It is instead intended as a narrow remedy --
10 necessitated by the Postal Service's operationally-driven cost-cutting objective to
11 encourage DAL mailers to convert to less-costly addressing procedures -- that will
12 enable DAL mailers to do precisely what the Postal Service wants: to eliminate DALs
13 and reduce postal costs.

14 Our proposed limitations on use of simplified addressing on city routes -- to
15 saturation flat mailers who mail on a regular frequency at least twelve times a year and
16 who maintain a certified mailing list as prescribed by the Postal Service -- are in
17 recognition that the necessity for simplified addressing is driven by the Postal Service's
18 operational determination to encourage mailers to convert away from the long-standing
19 DAL addressing procedure, as a way of improving USPS operating efficiency and
20 reducing USPS costs. The simplified address remedy should therefore be tailored to
21 the DAL operational changes that have spawned its need.

22 To my knowledge, among saturation flat mailers, DALs are used almost
23 exclusively by shopper publications and shared mail programs who mail on a regular
24 monthly-or-more-frequent schedule and whose mail production operations involve the

1 complex insertion of preprints into their mail products – a complexity that makes “on-
2 piece” addressing difficult or impractical and for some impossible.

3 By contrast, sporadic “solo” mailings such as catalogs or standalone advertising
4 circulars do not require a complex “inserting” process and can be readily addressed on-
5 piece without jeopardizing critical “in-home” delivery dates. For them, the DAL
6 procedure is not an operational necessity; and consequently, a simplified addressing
7 alternative to the DAL surcharge is not an imperative.

8 The proposed requirement that the mailer (or its production agent) maintain a
9 certified mailing list as prescribed by the Postal Service is intended to mitigate (1)
10 potential concerns of mailing list brokers and suppliers about the impact of simplified
11 mail on their list businesses; and (2) any misplaced “fear” that allowing simplified
12 addressing on city routes would lead to an “undesirable flood” of new mail volumes.
13 Our objective is simple and narrow: to give mailers who are dependent on the current
14 DAL addressing procedure an addressing alternative that will enable them to avoid the
15 surcharge and reduce Postal Service costs, with minimal disruption.

16 We are, of course, keenly aware that the Postal Service has not yet decided to
17 allow simplified addressing on city routes, although we are urging it to do so. We
18 fervently hope that it will do so sufficiently in advance of the rate implementation date
19 that current DAL mailers will be able to make the switch and avoid the DAL surcharge –
20 and thereby further reduce Postal Service costs, maximizing the benefits for both the
21 industry and the Postal Service.

1 CONCLUSION

2 Our industry has taken the initiative and stands ready to do its part in improving
3 Postal Service efficiency and reducing costs. We are prepared, at great risk, to
4 fundamentally transform our operations and our mail products in an unprecedented
5 manner. What we ask in return – what we *need* in return – is for the Postal Service to
6 join with us half-way, by giving the industry a viable addressing alternative to DALs on
7 city delivery routes.

8 The proposed 1.5-cent surcharge is an essential element in providing mailers an
9 incentive to undertake this complex and costly transformation to on-piece addressing.
10 But standing alone, it is not enough. For those in our industry who cannot feasibly
11 convert to “city-style” addressing on city delivery routes, the surcharge is not an
12 “incentive” but a punishment.

13 The Commission, of course, cannot require the Postal Service to allow DAL
14 mailers a simplified addressing alternative on city delivery routes. That is the Postal
15 Service’s decision to make. In this regard, we believe that our proposed limitations, by
16 “bracketing” the dimensions of volume conversion to simplified addressing and
17 mitigating concerns about its implications and impact, will enhance achievement of a
18 true “win, win” outcome for the Postal Service and our industry.

19 We would urge the Commission, in considering the other elements of the Postal
20 Service’s proposed ECR rates, to take into account the unusual challenges and risks
21 confronting our industry at this critical juncture as we adapt to the DAL surcharge. To
22 the mailers in our industry, this is far more than a mere “transformation” because the

1 fundamental changes we must implement have to be accomplished in an extremely
2 short timeframe. It is truly revolutionary.

3 Every postal rate case creates what I would call a “normal” (and high) degree of
4 uncertainty within our industry, not knowing until the last minute what rates will be
5 recommended and the impact on our price-sensitive businesses. Here, however, the
6 DAL surcharge and related issues exponentially magnify that uncertainty. Because of
7 the long lead time required to convert their operations and products to on-piece
8 addressing, DAL mailers at this moment are having to make critical decisions and
9 investments without knowing what the final rates will be. We are already facing seismic
10 changes. I would therefore urge the Commission to exercise great caution in
11 considering changes that others might propose to the rates proposed by the Postal
12 Service for ECR saturation flat mail. Our extremely price-sensitive businesses cannot
13 afford a meteor striking on top of the earthquake.