

January 31, 2011

United States Postal Service  
Postal Regulatory Commission  
901 New York Ave NW Suite 200  
Washington, DC 20268-0001

RE: Docket No. MT2011-3: Market Test-Marketing Mail Made Easy

Honorable Commissioners:

I cannot object more vigorously to this latest intrusion to the business of the private sector when no United States Postal Service involvement is necessary or advisable.

Our companies, mine and those of other mailing services providers, printers and fulfillment companies of our direct mail marketing industry, have offered exactly this service for many, many years in a capable fashion and at rates that are reasonable. It is no more than supposition on the part of the United States Postal Service that small and medium-size businesses are un-served or under-served for this advertising product and it offers no compelling substantiation for the claim. It is a false claim and should be ignored as such in the filing.

Our company in particular has been both a "Resident" list compiler and "Resident Saturation" mailing services provider for decades and we have made that widely known and frequently provided in the markets we serve. For the USPS to now claim that we have failed miserably in those efforts is disingenuous, devious, pandering to their unions and insulting to my company and those dozens of others in our industry with which I am well acquainted. Again, a USPS that claims to be a "partner" to the companies of my industry is overstepping its purpose and mandate by further establishing themselves as a "predatory competitor".

The USPS makes assumptions about this market test regarding the "ease of preparation" by small and medium-size businesses which cannot be supported by either experience or observation. Granted the USPS has removed the so-called "barriers" of permits, permit fees or annual accounting fee, a business of any size must still possess the requisite understanding of the underlying mail preparation requirements. Not just of the mailing's makeup, but of all the other planning and strategic necessities (i.e. route locations including geo-demographic mapping if necessary, logistics versus neighboring competitors, count aggregation, printing, delivery logistics and timing, etc.) that make the implementation of this advertising tactic complicated but practicable.

Furthermore, it is our companies that are uniquely qualified and capable of optimizing this advertising strategy for a reasonable expectation of a successful outcome with positive return on investment. The USPS is ill-equipped and its employees unwilling to provide the same guidance and professional services necessary to ensure these outcomes. In any case, our company has removed the payment of fees by OUR CUSTOMERS as a barrier, so this claim, too, is without basis.

Regarding the cancelling of the fees, shouldn't the USPS now rebate our company's permit fee and dozens of years of annual renewal fees in-as-much as these apparently are not deemed important to the USPS's revenue picture related to mail entry? This is unfair to our companies which have paid these fees for several dozens of years and to the tune of thousands of dollars.

I also strenuously object to the USPS introducing a market test under an authority for which no "established regulations" or "specific procedures" have been created to do so lawfully. Does not the probability exist that the established regulations and specific procedures to be applied to the USPS authority in this case would forbid them from introducing a market test for products and services already fully and easily acquired a company such as ours in the private marketplace? It appears they are attempting to preempt the process by introducing this market test prematurely and potentially illegally. They should wait for the establishment of regulations in this regard and then proceed properly, even though, for cases such as this, in direct conflict with the desires and needs of the mailing industry.

Though I can continue with an extensive litany of challenges to the language of the USPS notice of a market test of an "experimental product" (which in actuality is not experimental to anyone except the USPS), and though the USPS claims that relatively little revenue will be received during the test, I object to the destruction of services revenue to our company. The amount of revenue to our company for preparing this category of mail is of measurable importance in as much as it provides roughly 28% - 35% of our total annual revenue. Imperilment of this revenue could cause catastrophic consequences on the sustainability of our company and its 21 employees.

In this day of shrinking direct mail marketing use due primarily to electronic alternatives (internet marketing, search engine marketing and optimization, mobile marketing, short message service marketing, blogging, tweeting, social network marketing, and so on), every source of revenue for our company is critically important.

Again, I object to the USPS using its substantially superior position to impede the progress and imperil the viability of small businesses such as ours. In an area where a it is totally unwarranted and unjustifiable, I don't think it advisable or fair for the USPS to implement this market test.

Sincerely,

Marc Brenard  
Sales Manager  
Publisher's Diversified Mail Service, Inc.