

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON DC 20268-0001**

RATE ADJUSTMENT DUE TO)
EXTRAORDINARY OR) Docket No. R2010-4
EXCEPTIONAL CIRCUMSTANCES)

**COMMENTS OF THE AFFORDABLE MAIL ALLIANCE
(August 17, 2010)**

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COMMENTS OF THE AFFORDABLE MAIL ALLIANCE

Pursuant to Order No. 485, the Affordable Mail Alliance respectfully submits these comments on the Postal Service's July 6 request for Commission approval of rate increases averaging 5.6 percent, approximately ten times the increase in the Consumer Price Index. The Affordable Mail Alliance is a coalition of nearly 1,000 large and small businesses, nonprofit organizations and associations of mailers that together account for a majority of the mail sent in the United States. A list of the Alliance's members appears in Appendix A to this Motion.

These Comments do not repeat all of the points made in AMA's July 26 Motion to Dismiss, which we hereby incorporate by reference. Rather, we focus here on (1) the Postal Service's August 2 response in opposition to the motion; (2) the August 9 letter-comments of Senator Susan M. Collins; (3) the testimony during the hearings before the Commission on August 10-12; and (4) the additional information submitted by the Postal Service in response to the Commission's information requests.

AMA is also submitting an appendix of impact statements by individual mailers and industry trade associations. These impact statements describing the painful austerity measures that these entities have taken to survive the recent recession, and the damage that the exigent rate increase is likely to inflict on these mailers, their customers or clients, the public at large, and the Postal Service itself. In addition, a number of AMA members are filing separate comments or impact statements under their own cover.

SUMMARY

When AMA prepared its July 26 Motion to Dismiss, we focused primarily on the Postal Service's failure to show that it would need an exigent rate increase if it followed "best practices of honest, efficient, and economical management" (39 U.S.C. § 3622(d)(1)(E)). As we explain in Section III, below, AMA still believes that the Postal Service has failed this efficiency requirement. The testimony of the Postal Service's witnesses during the hearings on August 10-12 makes clear, however, that the case for an exigent rate increase founders on an even more immediate ground.

Under none of the scenarios projected by the Postal Service will it stop meeting payroll or delivering the mail before September 30, 2011, the last day of Fiscal Year 2011. Moreover, the exigent increase, even if approved and implemented exactly as proposed, would not extend the Postal Service's ability to deliver mail by a single day. The only difference is that the exigent rate increase would allow the Postal Service to pay the Treasury about \$2 billion more on September 30, 2011, to prefund the Postal Service's retiree health benefits—although in neither scenario would the Postal Service pay the full \$5.5 billion installment specified by current law. In the most basic and direct sense, the proposed rate increase is not "necessary" under section 3622(d)(1)(E).

On the second day of hearings, the Postal Service, recognizing the damaging implications of these facts under 39 U.S.C. § 3622(d)(1)(E), pivoted furiously. The Commission should not look just at the short-run period

through FY 2011, USPS witness Masse asserted. The *real* justification for an exigent rate increase, he maintained, is the shortfall that the Postal Service projects over the next *ten* years—from today through 2020. Over that period, he said, the USPS expects to lose \$115 billion. The “fundamental” cause of the shortfall is the *long-term* “volume decline” that began several years ago. An exigent increase could offset some of this projected shortfall by providing “\$30 billion plus interest” in extra revenue over the same ten-year period.

This alternative theory of the case, however, fails to satisfy two other requirements of section 3622(d)(1)(E). First, the longer-run time horizon causes the Postal Service’s already-tenuous claim that its projected losses result from “extraordinary or exceptional” circumstances to collapse entirely. A long-term erosion of mail volume and revenue resulting from a progressive migration of communications to the Internet since the 1980s is the antithesis of an “extraordinary or exceptional” circumstance.

Second, a ten-year time horizon multiplies the Postal Service’s opportunities to get its costs under control and, in the words of section 3622(d)(1)(E), move towards “best practices of honest, efficient, and economical management.” Conversely, approval of the exigent rate increase would provide a \$30 billion excuse for continuing to delay both cost control and legislative relief based on the Postal Service’s overfunding (or, more precisely, its customers’ overfunding) of the Postal Service’s pension obligations. Even worse, approval of this exigent rate increase is likely to lead to further exigent rate increase proposals during the decade.

These facts warrant denial of the proposed rate increase in its entirety on the ground that the Postal Service has failed to make a prima facie case under 39 U.S.C. § 3622(d)(1)(E).

COMMENTS

I. THE POSTAL SERVICE WILL HAVE ENOUGH CASH TO OPERATE IN FY 2010 AND FY 2011 WITHOUT THE EXIGENT RATE INCREASE OR ANY MAJOR IMPROVEMENTS IN EFFICIENCY.

The testimony of the Postal Service's witnesses during the hearings on August 10-12 revealed a fundamental hole in the Postal Service's case: whether or not the Postal Service improves its efficiency, the proposed rate increase is simply not "necessary" under section 3622(d)(1)(E). Even the worst-case scenario offered by the Postal Service does not project that it will stop meeting payroll or delivering the mail before September 30, 2011, the last day of Fiscal Year 2011. Moreover, the exigent rate increase, even if approved and implemented exactly as proposed, would not extend the Postal Service's operations by a single day. In the most basic and direct sense, the proposed rate increase is not "necessary" under section 3622(d)(1)(E).

A colloquy on the first day of hearings between Chairman Goldway and Joseph Corbett, the Postal Service's CFO, put the facts starkly:

CHAIRMAN GOLDWAY: Without a rate increase in what month does the Postal Service expect to run out of cash?

THE WITNESS: And that would be September 30, 2011.

* * *

CHAIRMAN GOLDWAY: With a rate increase in what month does the Postal Service expect to run out of cash?

THE WITNESS: With a rate increase and no other changes, no other fundamental changes, we would run out of cash September 30, 2011.

Tr. 1/39-40. The only difference, according to Mr. Corbett, is that the exigent rate increase, if implemented as proposed, would allow the Postal Service to pay the Treasury about \$2 billion more on September 30, 2011, to prefund the Postal Service's retiree health benefits—although in neither scenario would the Postal Service pay the full \$5.5 billion installment specified by current law. Tr. 1/40, lines 15-20 (Corbett); *accord*, Tr. 2/216 (Masse); *see also* Tr. 2/247-248 (Masse) (both Congress and the Administration “understand” that the situation may require a partial payment); Tr. 2/199 (Commissioner Langley) (noting that “Congress seems to be indicating a willingness, at least this year, to again defer” all or part of the \$5.5 billion payment due this year).

Furthermore, more favorable alternative scenarios would extend the Postal Service's operations without an exigent rate increase even further. Legislative restructuring of the payment schedule for prefunding retiree health care costs or crediting the Postal Service with all or part of the \$55 billion (according to the Commission's Segal report) overpayment of pension costs would allow the Postal Service to continue meeting payroll and delivering the mail for several years longer without above-CPI rate increases—again, without an exigent increase or any improvements in efficiency beyond the business-as-usual efforts that the Postal Service has

projected. For example, relief from the \$5.5 billion prefunding requirements alone would extend the period of operations until 2015. Tr. 2/194-195 (Masse); *see also* Tr. 2/194 (Chairman Goldway) (“what would solve it [the “liquidity crisis”] is relief of something like you had last year from the government”).

The Postal Service, recognizing the damaging implications of these facts under 39 U.S.C. § 3622(d)(1)(E), changed course during the hearing on August 11. The Commission should not look just at the short-run period through FY 2011, USPS witness Masse asserted. The *real* justification for an exigent rate increase, he maintained, is the shortfall that the Postal Service projects over the next *ten* years—i.e., through 2020. Over this longer-run period, he said, the USPS expects to lose \$115 billion. Tr. 2/178-181. The “fundamental” cause of the shortfall is the *long-term* “volume decline” that began several years ago. *Id.* at 178, 234, 245-246. An exigent increase could offset some of this projected ten-year shortfall by providing “\$30 plus billion” in extra revenue over the same period. Tr. 1/38 (Corbett).

This ten-year loss projection merits no weight. Projections ten years into the future are inherently uncertain at best; and the \$115 billion loss projected by the Postal Service here is undocumented. The purported workpapers underlying the \$115 billion figure produced by the Postal Service in response to a Commission information request (issued at the request of ANM and MPA) (Tr. 3/359-360) are simply an unlinked spreadsheet and the PowerPoint slides and other advocacy pieces released by the Postal Service

on March 2, 2010, as part of its initiative to drum up public support for the exigent rate case and other external relief sought by the Postal Service. *See* Responses of the USPS to Follow-Up Question Of ANM/MPA (Aug. 13, 2010). These documents provide no detail, and no way to test the sensitivity of the loss estimate to assumptions about changes in Postal Service costs, efficiency or volumes going forward. *Id.*

Moreover, notwithstanding the Postal Service's characterization of its planned cost-saving initiatives as "ambitious" and "unprecedented," *id.*, the referenced documents cited by the Postal Service reveal only a business-as-usual incrementalism. McKinsey & Co., *Envisioning America's Future Postal Service: Options for a Changing Environment* (March 2, 2010). Specifically, the documents assume a continuing rise in hourly "workforce costs," with a mail processing network that is treated as "largely fixed" (*id.* at 8); continued reliance on voluntary attrition as the sole means of reducing employee head count (*id.* at 21); a cumulative total of only \$500 million in "workforce flexibility improvements" through 2020 (*id.* at 13); and a continuing rise in hourly workforce costs at or above the rate of inflation through 2020, with no apparent plans to eliminate or cut back the existing hourly compensation premium (*id.* at 3, 10, 21).

Finally, the long-term losses projected as a result of continuing volume declines over the ten-year period from 2011 through 2020 cannot be characterized as the result of "extraordinary or exceptional" circumstances, and the inefficiencies that the Postal Service tries to brush off as "structural"

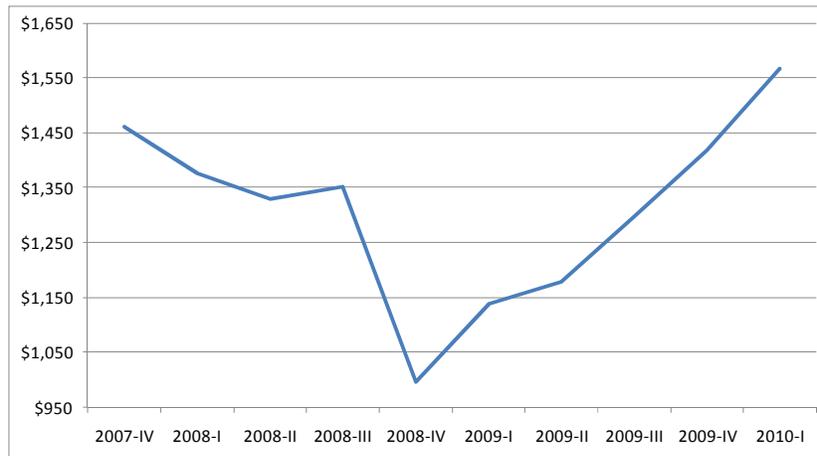
over the FY 2010-2011 period most certainly cannot be excused on this theory over the longer time horizon. We explain these last two points in Sections II and III, respectively.

II. THE CAUSES OF THE POSTAL SERVICE'S PROJECTED LOSSES AFTER FISCAL YEAR 2011 ARE NOT "EXTRAORDINARY OR EXCEPTIONAL" UNDER 39 U.S.C. § 3622(d)(1)(E).

The Postal Service's initial posture in this case was that the "extraordinary or exceptional" circumstance that justified an above-CPI rate increase under 39 U.S.C. § 3622(d)(1)(E) was the drop in mail volume and revenue resulting from recession that began at the end of 2007. *See* Request at 1, 7; Corbett Statement at 16; USPS Response to Motion to Dismiss (Aug. 2, 2010) at 12, 18-20, 55-56.

For the reasons explained by AMA in its July 26 Motion to Dismiss, the recent downturn in volume and the projected short-term volume shortfalls in FY 2010 and FY 2011 do not constitute "extraordinary or exceptional" circumstances in the sense of the statute. The erosion of mail volume to the Internet has been underway since the 1980s, and recessions are recurring events. Moreover, the recession that began at the end of 2007, although above-average in severity, was not severe enough to prevent well-run large American businesses (and certainly those with the degree of market power that the Postal Service still possesses) from returning to profitability by cutting costs within a quarter or two after the recession bottomed out in the spring of 2009. AMA Motion to Dismiss at 40-45.

Corporate Profits (in Billions)



The above figure, which displays Bureau of Economic Analysis data on Corporate Profits (Seasonally Adjusted at Annual Rates), underscores how quickly private firms were able to rebound from the trough of the recession. Finally, the financial impact of the recent recession is only a small fraction of the \$30+ billion in additional revenue that the Postal Service expects to gain from the proposed exigent rate increases over a ten-year period.

This analysis finds confirmation in the August 9 letter-comments by Sen. Susan Collins, the author of 39 U.S.C. § 3622(d)(1)(E) and one of the primary authors of the 2006 legislation as a whole. In a detailed analysis of the genesis of the exigency provision, Senator Collins demonstrates that the causes of the Postal Service’s “current financial condition,” primarily “its own failure to sufficiently update its business model to adapt to predictable and natural cyclical changes in the economy and mail usage,” are not the “‘extraordinary or exceptional circumstances’ required by law to initiate an exigent rate case.” Comments of Sen. Collins at 1.

The Postal Service argues that the economic downturn and the rise of the Internet fall within the “plain language” dictionary definitions of “extraordinary or exceptional” circumstances. The Postal Service brushes off the contrary interpretation advanced by Sen. Susan Collins, the primary author of 39 U.S.C. § 3622(d)(1)(E), as the uninformed opinion of a dilettante that is “inherently entitled to no weight.” USPS Response at 11-15; Tr. 1/116 (Corbett) (“How someone outside the organization who spends a couple hours a month on this would have any clue I have no idea.”). It is the Postal Service, however, whose statutory analysis is faulty.

First, the Postal Service gains nothing with “plain language” dictionary definitions: the cited definitions for “extraordinary or exceptional” (e.g., “beyond what is usual,” “exception,” “rare instances,” “unusual”), like the words “extraordinary” and “exceptional” themselves, are “simply too protean” to resolve the issue. *Verizon Communications Inc. v. FCC*, 535 U.S. 467, 501 (2002).

Second, the Postal Service makes no attempt to reconcile its expansive reading of “extraordinary or exceptional” circumstances with the structure or purpose of section 3622(d)(1)(E). A fundamental rule of statutory construction is that words and phrases should be interpreted not in isolation, but in light of the underlying purpose and context of the statute *as a whole*. *Albuelhawa v. United States*, 129 S.Ct. 2102 (2009); *Dolan v. USPS*, 546 U.S. 481 (2006). As AMA explained in its July 26 Motion to Dismiss, giving a narrow scope to the exception for “extraordinary or exceptional” is essential

to preserving the incentive effect of an index-based price cap, and protecting customers if the regulated monopoly fails to respond adequately to the incentives. Motion to Dismiss at 9-15. That is precisely why exigency provisions of this kind have tended to be very narrowly drawn. *Id.* at 12-13. The Postal Service simply ignores these facts.

Third, the Postal Service's attempt to dismiss Sen. Collin's interpretation of section 3622(d)(1)(E) as merely a "post-enactment legislative history" ignores the fact that her comments are based not merely on her personal recollection today, but also on a detailed recital of many years of *pre-enactment* statements by key legislators and officials.¹

Fourth, the Postal Service's contention that AMA's interpretation would effectively write the exigency provision of section 3662(d)(1)(E) out of the act by barring relief unless the Postal Service enters a "Nirvana state" of perfection (USPS Response at 21) is an attack on a straw man. Even a Postal Service with considerable inefficiencies would be entitled to relief under section 3622(d)(1)(E) if curing the inefficiencies would still leave the regulated firm short of funds necessary to operate. *See Consolidated Rail Corp. v. United States*, 812 F.2d 1444 (3rd Cir. 1985).

¹ The Postal Service's attempt to exclude any implication of unforeseeability from the concept of an extraordinary or exceptional circumstance (USPS Response at 15-18) is equally unfounded. As Time Warner explains in its separate comments, the Postal Service's claim that the Commission excluded any element of unforeseeability from the Postal Service's proof requirements under section 3622(d)(1)(E) is a crude misreading of the Commission's decision.

In light of the evidence submitted by the Postal Service at the Commission next week, however, the Commission need not spend time on these issues. The Postal Service's belated embrace of a ten-year loss projection causes any possible claim of "extraordinary or exceptional" circumstances to collapse entirely. Losses of this duration cannot be blamed on the recession of 2007-2009, which is likely to be far in the past by 2020. Rather, if such losses occur, they will result from the continued long-term migration of communications to the Internet since the 1980s, and the Postal Service's continued failure to control its costs.² Furthermore, the information produced by the Postal Service on August 14 in response to a Commission information request revealed that the majority of the projected \$115 billion—\$63.3 billion—will occur after FY 2015.³

In addition, a significant driver of the projected losses is the Postal Service's projected inability to limit unit cost increases from FY 2011 to FY 2020 to the rate of inflation despite only gradual declines in volume. According to the Postal Service's projections, unit operating costs will increase by 30 percent during this period, from 43.2 cents per piece in FY 2011 to 56.2 cents per piece in FY 2020.⁴ Finally, more than \$18 billion of the

² By 2020, the recent recession should be years in the past. Even the Great Depression did not last 13 years.

³ See www.prc.gov/Docs/69/69700/ANM.MPA.McK.xls (worksheet entitled "March 2, 2010 Mgt Plan") (row entitled "EOY Debt Balance").

⁴ The Commission can verify these values by dividing FY 2011 and FY 2020 operating costs by volume from ANM.MPA.McK.xls (filed on Aug. 13, 2010 and available at www.prc.gov/Docs/69/69700/ANM.MPA.McK.xls). On the other hand, the same workpaper projects that the CPI will increase by only 18.5 percent during the same period. *Id.*

projected losses are interest payments (primarily in the later years). These chronic conditions are the antithesis of extraordinary or exceptional circumstances.

As Commissioner Langley asked: “How do you [defend the proposed rate increase as] exigent when it’s [justified as] part of a seven-prong approach to *long-term* solvency?” Tr. 2/205-206. Commissioner Blair made a similar point:

But it sounds that these liquidity problems are going to be a year-to-year crisis and clinging from one crisis to the next, and I’m trying to get a sense of what is extraordinary and exceptional, and was it extraordinary and exceptional this year, or is this a continuing ordinary and exceptional circumstance over the next five years that we’re going to be seeing rate increases over and above inflation in the Postal Service?

Tr. 2/196-197. *See also* Tr. 2/181 (Chairman Goldway) (expressing surprise at the extent of the Postal Service’s focus on longer-run projections rather than the “short-term emergency, which is what one would normally presume this request would be for”).

Mr. Corbett admitted the routine and recurring nature of the diversion of First-Class Mail volume in a colloquy with Vice Chairman Hammond:

VICE CHAIRMAN HAMMOND: Now, the Internet has been around for awhile and the volume of single piece First-Class has been in a general decline pretty much for several years, that’s right, isn’t it, overall?

THE WITNESS: That’s correct.

VICE CHAIRMAN HAMMOND: Okay. So gradual decline in first-class volume is not an extraordinarily or exceptional circumstance as I read your testimony. The extraordinary and

exceptional thing was the major volume decline at the end of 2008, and it's gone through 2009. That's correct, isn't it?

THE WITNESS: That's correct.

Tr. 1/49-50.

III. THE POSTAL SERVICE COULD GENERATE BILLIONS OF DOLLARS OF ADDITIONAL SAVINGS EACH YEAR THROUGH “BEST PRACTICES OF HONEST, EFFICIENT AND ECONOMICAL MANAGEMENT.”

The Postal Service’s August 2 Response and testimony on August 10-12 also confirm the Postal Service’s failure to show that it would face a cash crisis—or suffer any losses at all—if it adhered to “best practices of honest, efficient, and economical management.” 39 U.S.C. § 3622(d)(1)(E). The Alliance’s July 26 motion summarizes decades of official reports, from the 1968 Kappel Commission to the present, documenting the Postal Service’s inefficiencies and the uneconomic costs that result from them. Specifically:

- The Postal Service maintains an inefficiently large network of undersized and obsolete mail processing facilities. Motion at 21-25.
- The Postal Service has an oversized work force, inflexible work rules, and low productivity. *Id.* at 25-30.
- The total compensation of Postal Service employees—more than \$80,000 per employee on average—is well above the amounts paid in the private sector for comparable work. According to the Postal Service’s own experts, this compensation premium is probably more

than 30 percent. This inefficiency costs the Postal Service and the public \$10 to 14 billion or more in needless costs annually. *Id.* at 30-34, 55-56.

- The loss of mail volume to the Internet was not an unforeseeable surprise. The Postal Service had notice of this threat years before significant volume losses occurred. *Id.* at 35-39.
- The Postal Service's failure to cope effectively with the 2008-2009 recession is further evidence of structural inefficiency. The average firm in the private sector saw its revenues collapse by nearly as much as the Postal Service; and many large firms saw their revenues collapse by 20 percent or more. Well-run private firms, including the Postal Service's competitors, responded to the downturn with immediate headcount reductions and other aggressive and painful austerity measures that resulted in a return to profit relatively quickly, even while sales volume and revenue remained depressed. The Postal Service, by contrast, contented itself with a business-as-usual incremental approach to cost cutting that allowed productivity to plummet and unit costs to get further out of control. *Id.* at 39-55.⁵

⁵ The Postal Service tries to downplay the relative effectiveness of UPS and FedEx in dealing with the recession on the theory that the two private companies suffered smaller volume declines than the Postal Service, and have raised their rates faster than the Postal Service is proposing. USPS Response at 43-48. The Postal Service neglects to mention, however, that both FedEx and UPS also experienced large declines in average revenue *per piece* in 2009. The average revenue per piece received by FedEx Express,

- The Postal Service’s financial loss projections in this case assume no major improvements in cost control in the future. *Id.* at 55-57.

Moreover, a ten-year time horizon multiplies the Postal Service’s opportunities to get its costs under control and, in the words of section 3622(d)(1)(E), to move towards “best practices of honest, efficient, and economical management.” By contrast, the exigent rate increase, if approved, could serve as a \$3 billion-a-year crutch that undermines support for the long-term solutions the Postal Service really needs: controlling its costs and obtaining credit for its overfunding (or, more precisely, its customers’ overfunding) of the Postal Service’s pension obligations. As Chairman Goldway noted, the proposed rate increases just don’t solve the “short run or

which accounts for most of FedEx’s revenues, declined by 16 percent from the quarter ending November 2008 to the quarter ending November 2009. Federal Express Statistical Book (FY2010, Q4) (downloaded from <http://www.fedex.com/us/investorrelations/> on August 3, 2010). The average revenue per piece received by UPS declined by 8.1 percent between 2008 and 2009. UPS 2009 Annual Report (at 23).

The Postal Service’s further claim that both UPS and FedEx rode out the recession through price increases of the same magnitude now proposed by the Postal Service is equally misleading. The price figures cited by the Postal Service are the percentage increases in the two private carriers’ *published* prices. Both FedEx and UPS, however, routinely offer discounts from their published prices. As a result, each company’s average *effective* prices are considerably lower. The Postal Service’s pricing witness, James Kiefer, admitted during the July 23 technical conference in this case that widespread discounting from list price by FedEx and UPS made their published price increases meaningless. (Source: audio of technical conference posted on PRC website, approximately 37 minutes after the beginning of the audio.) In fact, the average revenue per piece received by UPS and FedEx Express declined from Calendar Year 2008 to Calendar Year 2009. The published price increases were further offset by reductions in fuel surcharges. (Source: USPS Response to AMA (filed August 2, 2010) at 45.

the long run” problems the Service faces. Tr. 2/238-239. Similarly, Commissioner Blair likewise found himself “troubled” that “we’re bouncing back and forth on a path that doesn’t seem to provide a long-term solution to the Postal Service’s fundamental problems, and I’m concerned that this [rate increase] may add to the problem rather than subtract from it.” Tr. 2/245.

Even worse, approval of this exigent rate increase is likely to lead to further exigent rate increase proposals during the decade. “Do you see the Postal Service operating in the future under this price cap regime?” Commissioner Blair asked Mr. Masse. Tr. 2/191. “Is it a viable pricing or ratemaking structure for the Postal Service over the next five to 10 years?” *Id.* “[I]t sounds that these liquidity problems are going to be a year-to-year crisis.” *Id.* at 196. “[I]s it fair to anticipate an exigency request every time the economy fails? . . . Are we going to be back in this room again in 12 months or 18 months?” Tr. 2/192, 193 (Commissioner Blair). Mr. Masse’s responses were un reassuring: “Only time will tell,” he said repeatedly. Tr. 2/191, 193.

The Postal Service’s August 2 Response, while long on rhetoric, does not seriously dispute the existence and magnitude of the Postal Service’s deep-rooted inefficiencies. To the contrary, the Postal Service concedes that its costs are rigid and excessive in many ways. USPS Response to Motion to Dismiss at 6-7, 9, 27-35, 41-42, 47; Tr. 1/98-99 (Corbett). Equally damning is the Postal Service’s statement that it cannot live within the CPI cap on rate increases *even if* it receives some \$50-55 billion in credits from Congress. *See*

Tr. 1/55-56 (colloquy between Vice Chairman Hammond and USPS witness Corbett). As Commissioner Blair noted during the hearing, the CPI cap, without an X-factor offset for productivity, “is, frankly, a very generous cap in a regulatory regime like we have.” Tr. 2/195-196.⁶

The Postal Service defends itself on the theory that its bloated costs are the fault of other people, beyond the Postal Service’s control, and therefore not the Postal Service’s responsibility to eliminate. USPS Response to Motion to Dismiss at 6-7, 27-35, 41-44, 47. While efficiency is “in the” Postal Service’s “DNA” (Tr. 1/59 & 116 (Corbett)), a “lack of operating flexibility” is paralyzing (Tr. 1/82-83 (Corbett)).

This buck-passing does not begin to satisfy the efficiency requirement of 39 U.S.C. § 3622(d)(1)(E). The Postal Service undoubtedly faces institutional constraints that private firms do not face.⁷ But the Postal

⁶ The Postal Service’s assertion that the CPI is a “challenging” cap because it already has productivity embedded in it (USPS Response at 48-49) is incorrect. While the unit prices of the goods and services used to construct the CPI undoubtedly reflect the productivity of the firms that *produce* those goods and services, the CPI does not reflect the productivity (or lack thereof) of the Postal Service in transforming those goods and services into *its own* outputs. It was for precisely analogous reasons that Drs. Caves and Christensen, among others, argued so vehemently for the addition of a productivity adjustment to the railroad cost index. *See Western Coal Traffic League v. United States*, 677 F.2d 915 (D.C. Cir. 1982) at 919 (last full paragraph).

⁷ The Postal Service also enjoys unique advantages that private competitors lack. The Postal Service cites a December 2007 finding by the Federal Trade Commission that “that the Postal Service’s unique legal status ‘likely provides it with a net competitive disadvantage versus private carriers.’” USPS Response (Aug. 2,2010) at 43-44 (quoting FTC, *Accounting for Laws That Apply Differently to the United States Postal Service and Its Private Competitors* at 8 (December 2007)). The Postal Service neglects to mention,

Service's self-serving portrayal of itself as a pitiful, helpless giant, legally barred from making a significant dent in its billions of dollars of excess expenses (and hence relieved of any responsibility for controlling them), is a caricature. The Postal Service has many cost-saving opportunities available to it that remain to be pursued seriously. Given the magnitude of the Postal Service's inefficiencies, even a modest improvement could result in billions of dollars of additional savings annually. For example:

(1) The Postal Service makes much of the supposed legal obstacles to closing retail post offices. But the Postal Service cites no legal obstacles (including restrictive language in appropriations bills) to the closure of most Processing & Distribution Centers and other central mail processing facilities. Since 2005, however, the Postal Service has closed only 2 of its 270 P&DCs. "U.S. Postal Service: Strategies and Options to Facilitate Progress toward Financial Viability," Report No. GAO-10-455 (April 2010) at 13-14, 31. Instead, the Postal Service boasts because it saved \$68 *million*—only about 1/10 of one percent of total USPS revenues—from area mail processing consolidations ("AMPs") in the past year. Tr. 1/60-61 (Corbett).

however, the findings of the same FTC report that the Postal Service has numerous cost advantages over the private sector (e.g., exemption from many federal, state and local taxes, lower borrowing costs as a result of the Postal Service's status as an establishment of the federal government, sovereign immunity from many potential tort claims, ability to exercise eminent domain, and the postal and mailbox monopolies). *Id.* The net cost disadvantage of the Postal Service, after offsetting these preferences, is only about \$213-743 million per year—a small fraction of the rate increase proposed by the Postal Service, and an even smaller fraction of the total squandered each year because of the Postal Service's inefficiencies. *Id.*

(2) A number of enterprises in the United States have asked their employees to reopen existing collective bargaining agreements in light of the recession. *See* Motion to Dismiss (Aug. 2, 2010) at 15, 45-46. Given the supposedly parlous state of the Postal Service's finances, reopening of existing collective bargaining agreements with postal labor would be a logical step. During the August 10 hearing, however, USPS witness Corbett admitted that he was completely unaware of whether such relief would be sought. Tr. 1/100.

(3) Two of the Postal Service's national collective bargaining agreements expire in November 2010 (with the American Postal Workers Union and the National Rural Letter Carriers' Association), and two more in November 2011 (with the National Association of Letter Carriers and National Postal Mail Handler Union). The expiration of these agreements presents a timely opportunity to negotiate reductions in head counts, greater freedom to employ layoffs and furloughs, and improved flexibility in work rules and employee utilization. Successful negotiations could narrow, or even eliminate entirely, the forecast 10-year shortfall.

(4) The expiration of the same collective bargaining agreements also presents a timely opportunity to deal with the more than \$10 billion in above-market compensation that the Postal Service concedes it pays. The Postal Service, however, already appears to have taken the renegotiation of these compensation premiums off the table. Tr. 1/120-121 (Corbett). Instead, the Postal Service appears content simply to try to reduce its share of the

total cost of the health benefit packages—from the current 81% down to 72%, the percentage paid by other federal agencies. *Id.* Even a full nine-point reduction would save the Postal Service only about \$750 million per year. This is a small fraction of the \$10 to \$14 billion or more in excess costs that the Postal Service incurs each year because of the existing compensation premiums. Moreover, even these limited savings would occur with halting slowness: the Postal Service does not seek to increase the employee contribution by more than one percentage point per year. Tr. 1/121 (Corbett). At that pace, even the \$750 million savings target will not be reached until 2020.

(5) The Postal Service suggests that seeking relief in arbitration from inflexible hiring and work rules and above-market compensation premiums is useless because arbitrators tend simply to rubber-stamp the *status quo*. USPS Response at 31-33. But the Postal Service has not invoked its right under 39 U.S.C. § 1207 to arbitrate its major collective bargaining agreements in years, and certainly not since the beginning of the recent recession. It is premature to assume without exhausting the arbitration remedy that arbitrators today would ignore the supposedly “extraordinary” and “exceptional” economic developments since the last arbitration decisions, and the desperate financial straits the Postal Service says it now faces as a result. This is particularly so given the number of economic concessions made by unionized employees of state and municipal government employees as well as private sector employees—including the unionized employees of the Postal Service’s customers—since the beginning of the current economic

downturn. Motion to Dismiss (July 26, 2010) at 45-46; Brophy (Consumers Union) Impact Statement. At a minimum, best practices of “honest, efficient and economical management” certainly require that the Postal Service at least exhaust its administrative remedies under 39 U.S.C. § 1207 rather than throwing up its hands and shifting \$3 billion in costs annually to mailers as the stakeholders of first resort.

(6) Finally, the Postal Service’s analysis of the legal implications of the “honest, efficient and economical” standard is as inaccurate and one-sided as the Postal Service’s discussion of the facts. The notion that the standard of “honest, efficient and economical management” requires the regulator to ignore inefficiencies that result from past decisions by the regulated company (USPS response at 23-25) is contrary to precedent and would have perverse consequences. It is well-established, for example, that the standard of honest, efficient and economical management supports the disallowance of capital investment in long-lived assets as imprudent when made, even though the investment was the result of past decisions, and is now sunk and irrevocable. *Missouri ex rel. Southwestern Bell Tel. Co. v. PSC*, 262 U.S. 276 (1923); *Verizon Communications Inc. v. FCC*, 535 U.S. 467, 485-486 (2002). Indeed, the regulator may deny a regulated company a return on a sunk long-lived investment that was prudent when made but “rendered useless by unforeseen events.” *Verizon*, 535 U.S. at 484 n. 6 (citing *Duquesne Light Co. v. Barasch*, 488 U. S. 299, 311-312 (1989)).

In any event, a very large share of the Postal Service's excess costs is neither fixed nor sunk. Inefficient Processing and Distribution Centers, for example, can be closed or consolidated in a relatively short period. Likewise, as previously discussed, the Postal Service's major collective bargaining agreements are up for renegotiation when they expire this year or next, even if the Postal Service is unwilling to seek to reopen them during their term.⁸

⁸ The Postal Service argues at length that an unsuccessful attempt in Docket No. R2000-1 by one member of the Affordable Mail Alliance, ANM, to persuade the Commission to disallow portions of the Postal Service's revenue requirement in an omnibus rate case under "honest, efficient and economical" standard of the Postal Reorganization Act proves that the corresponding provision of PAEA is toothless. USPS Response at 56-58. This argument is nonsensical. In R2000-1, ANM argued that the "honest, economical and efficient" standard warranted disallowance of part of the Postal Service's revenue requirement. The Postal Service, relying on *Newsweek, Inc. v. USPS*, 663 F.2d 1186, 1203-1206 (2nd Cir. 1981), argued that "honest, economical and efficient" standard gave the Commission no authority to disallow any part of the revenue requirement. In its decision, the Commission finessed the statutory issue by finding that it had such authority, but that ANM had not proven the existence of inefficiencies with sufficient certainty. R2000-1 Op. & Rec. Decis. (Nov. 13, 2000) at ¶¶ 2060-2066. The Commission's action, while resting on grounds narrower than those urged by the Postal Service, was consistent with the Commission's general reluctance after *Newsweek* to enforce the "honest, economical and efficient" standard of the Postal Reorganization Act aggressively. But the PAEA, unlike the Postal Reorganization Act, unambiguously vests authority to enforce the "honest, economical and efficient" standard of PAEA on the Commission, not the Postal Service or its Board of Governors. Moreover, here, unlike in R2000-1, there can be no serious dispute about the existence of cost inefficiencies in this case: the Postal Service, as noted above, has admitted to them.

CONCLUSION

For the foregoing reasons, the Postal Service's Request should be denied in its entirety.

Respectfully submitted,

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APPENDIX A

MEMBERS OF THE AFFORDABLE MAIL ALLIANCE

Associations

Alliance of Independent Store Owners & Professionals
Alliance of Nonprofit Mailers
American Academy of Family Physicians
American Business Media
American Catalog Mailers Association
American Forest & Paper Association
Association for Mail Electronic Enhancement
Association for Postal Commerce
Association of College and University Mail Services
Canadian Printing Industries Association
City & Regional Magazine Association
Coalition of Religious Press Associations
Continuity Shippers Association
Custom Content Council
Direct Marketing Association
DMA Nonprofit Federation
Drug Information Association
Financial Services Roundtable
Graphic Arts Association (GAA)
IDEAlliance
Kentucky Press Association
Magazine Publishers of America
Mailing & Fulfillment Service Association
Major Mailers Association
Midwest Circulation Association
Missouri Press Association, Columbia, MO
National Alliance of Standard Mailers & Logistics
National Catholic Development Conference
National Newspaper Association
National Postal Policy Council
Pacific Printing and Imaging Association
PINE
Printing & Graphics Association MidAtlantic
Printing & Imaging Association of MidAmerica
Printing and Imaging Association of Georgia
Printing Association of Florida
Printing Industries Alliance

Printing Industries Association of San Diego
Printing Industries Association, Inc. of Southern California
Printing Industries of America
Printing Industries of Arizona/New Mexico
Printing Industries of Michigan
Printing Industries of Ohio - N.Kentucky
Printing Industries of St. Louis, Inc.
Printing Industries of the Gulf Coast
Printing Industries of the Midlands
Printing Industries of Utah, Inc.
Printing Industries of Virginia
Printing Industries of Wisconsin
Printing Industry Association of the South, Inc.
Printing Industry of Illinois/Indiana Association
Printing Industry of Minnesota, Inc.
Promotional Products Association International
Reserve Officers Association
Texas Press Association
The Envelope Manufacturers Association
The National Association for Printing Leadership
The Printing Industry of the Carolinas, Inc.
Visual Media Alliance
Wisconsin Newspaper Association

Companies (Other Than Local Newspapers) and Non Profit Organizations

1105 Media
4imprint, Inc.
ABIS, Inc.
AccuList USA®
Active Interest Media
Acxiom Customer Data Integration
Address N' Mail
Advecor
ALG Worldwide Logistics
Allergy Control Products
Allied Media, LLC
American Girl
American Institutes for Cancer Research
American Lung Association
American Master Products, Inc.
American Media, Inc.
America's Test Kitchen

Analytics Data, LLC.
Andrus Associates, LLC
Antiques & Fine Art Magazine
Aon's Affinity Insurance Services, Inc.
Arandell Corporation
Association of Marian Helpers
Association of State Baptist Papers
Baesman Group Inc.
Ball Publishing, West Chicago, IL
Barton Cotton
Baudville Inc.
BCC Software
Belleville Post
Belvoir Media Group
Benchmark Brands
Berres Brothers Coffee Roasters, Inc.
Blood-Horse Publications
Bluestone Perennials
Boardroom Inc.
Boise Inc.
Bonnier Corporation
Bon-Ton Stores, INC.
Bookspan
Böwe Bell + Howell
Bowling This Month
Brannon Publishing Services, Inc.
Brown Printing Company
Budco Bank Supplies
Budco Cable Supplies
Bust Magazine
Canon Communications
Catamount Color, a division of the Offset House
Center for Science in the Public Interest
Century Direct
Channing Bete Company
Charley's Greenhouse and Garden
Chefwear, Inc.
Chilcutt Direct Marketing, Inc.
Christian Book Distributors
Classic Designs by Matthew Burak
Clerics of St. Viator
Concord Litho
Condé Nast
Congregation of Notre Dame

Consumers Union
Cooking Enthusiast LLC
Corporate Press Communications Companies
Costco Wholesale
Crayola, LLC
Creative Age Publications, Inc.
Crosslists, Cross & Company
Cuddledown
Das Fenster German Magazine
Data-Mail, Inc.
DATAMATX
Deer-resistant Landscape Nursery
Diamond Marketing Solutions
DIR Corporation
Direct Brands, Inc.
Direct Response Associates, Inc
Disabled American Veterans
DMW | Direct
Domtar Paper Company, LLC
Donald E. Ferguson & Associates, L.L.C.
Dove Creek Press
Dresden Direct
DRG
DST Mailing Services
DTN/The PROGRESSIVE FARMER
Dwell LLC
Dynamic Targeted Branding
Eagle America Corporation
East Orange Record
Easter Seals
Editorial Projects in Education, Inc.
Edmund Optics
eMarketing Strategy
ESPN the Magazine
Everglades Direct, Inc.
Experian
Farm Progress Media
Farmers Insurance
Federal Direct
Fidelity Investments
First American Home Buyers Protection
First Data Corporation
FIS
Flagship Press

Forbes Inc.
FS Marketing Services, Inc.
GameInformer Magazine
Gardener's Supply Company
Gill Ashton Food Service Media Group
Glatfelter
Grand View Media Group
GrayHair Software
Great American Business Products
Guideposts
Hagadone Printing Company
Harlequin Enterprises Limited
Harte-Hanks
Haymarket Media Inc.
Hazelden Foundation
Hearst Magazines
Hemisphere Marketing
High Country Gardens
High Plains Publishers
Highlights for Children, Inc.
Hoard's Dairyman
Hodges Badge Company, Inc.
HoustonPBS
Human Rights Campaign
Huntsinger & Jeffer
I Do Magazine, Champaign IL
idm
ie-business
IlliniHQ Magazine, Champaign IL
Imaging Network Group
IMS Inc.
inde supply chain consultancy
InfoPrint Solutions
Insight Out of Chaos
Integrated Media Cooperative
intelisent
Interlink, Inc., Berrian Springs, MI
InterMedia Outdoors
International Masters Publishers
International Paper
IPC Print Services
Irvington Herald
Is It There Yet?
IWCO Direct

JJS&A Inc.
Johnson Publishing Company, Inc
JST Marketing Solutions, LLC
JVW Direct
K. Van Bourgondien & Sons
Key Communications Inc.
Lake Superior Magazine
LCH Direct
LDS Group Inc.
Lehigh Direct
ListGIANT
Lubenow & Associates
M&D Printing Co.
M&M Bedding, LLC
M2MEDIA360
Magazines of Politics, Policy, and Current Events
MAGIC Magazine
Mailbox Marketing Inc.
Manhattan Mailers
Marketsmith Inc.
Mason Companies, Inc.
Master Print Communications
Master Print Group
Masterworks
MCH, Inc.
MCS Management Services
Measured Intentions
Medco Health Solutions
MedTech Media
Meister Media Worldwide
Mercy Home for Boys & Girls
Meredith Corporation
Monadnock Paper Mills Inc
Motheral Printing Company
Mount Vernon Printing Co.
MPA Media
Mt. Lebanon Magazine
Myllykoski-North America
Mystic Logistics
National Committee to Preserve Social Security and Medicare
National Geographic Society
National Wholesale Co., Inc
Nature Publishing Group
Naval Aviation Museum Foundation

Naylor
NetGram
New Page Corporation
New York Magazine
NewBay Media
Newport Business Media
News-Record of Maplewood and South Orange
Nice Lines Direct Mail Inc.
Nomis Publications, Inc.
North American Membership Group
NPI, Dallas, TX
Nutley Journal
Nutshell Marketing, Inc
Omaha Steaks
Orange Transcript
Our Lady of Victory Homes of Charity
Our Sunday Visitor, Inc
Palm Coast Data
PARCELite Solutions
Penton Media
PESI HealthCare
PetEdge
PIME Missionaries
Plow & Hearth
Postal Systems Inc.
Premier Education Solutions, powered by PESI
ProMail Services, Inc.
Publishers Clearing House
Putman Media, Inc.
Quad/Graphics
Quadratic Inc.
qualitycolorgraphics
Raceline Direct, Inc.
Raymond Geddes & Company, Inc.
RBC Ministries
Reader's Digest
Reed Business Information
Response! Targeted Marketing
Ripon Printers
Rodale, Inc.
Rogers Printing Inc.
Rolling Stone
RR Donnelley
RSES

Sacred Heart Southern Missions
Santa Fe Greenhouses, Inc.
Sappi Fine Paper – North America
Scholastic Inc.
Scientific American
Sears Home Improvement Products
Senior Direct, Inc.
Servants of the Paraclete
ServiceMaster
Sisters of St. Louis
SkillPath Seminars
Southern MediaCom, Inc.
Southworth Company
Specialists Marketing Services
SRDS
St. Croix Press, Inc.
Stamats Business Media
Stenhouse Publishers
Stony Creek Brands LLC
String Letter Publishing
Structural Graphics
Summit Business Media
Summit Media
Summit Racing Equipment
tabs direct
TAPPI
TDO Communications
The Association of the Miraculous Medal
The Congregation of the Blessed Sacrament, Saint Ann's Shrine
The Eastwood Company
The Fence Post
The Franciscans/St Anthony's Guild
The Hartford
The Kiplinger Washington Editors, Inc.
The Magazine Factory
The Marist Brothers
The Port Network
The Sheridan Group
The Society of the Little Flower
The State Bar of Wisconsin
The Taunton Press
Time Inc.
Torchmark Corporation
Total System Services, Inc.

Trainers Warehouse
Transcontinental RBW Graphics
Trend Offset Printing
Trinity Direct
TurnKey Direct, Inc.
U.S. Data Corporation
Union County LocalSource
Unity School of Christianity
Uno Alla Volta LLC
UPM, North America
US Conference of Catholic Bishops
Vailsburg Leader
Vance Publishing
Velocity Print Solutions
Verso Paper
Vertis Communications
Vicon Publishing
Virginia Diner, Inc.
W. A. Wilde
Washingtonian Magazine
WATT
West Orange Chronicle
Williams Publications Company
Williams Sonoma
Wine Country Gift Baskets
Wm. K. Walthers, Inc.
WoodwardBizMedia
World Marketing Inc.
Yankee Publishing

Local Newspapers

Access Press, St. Paul, MN
Adair County Community Voice, Columbia, KY
Akron (CO) News-Reporter
Allegan County News, Allegan, MI
Alliance Times-Herald, Alliance, NE
Alvarado (TX) Star
Announcer, Wagner, SD
Appalachian News-Express, Pikeville, KY
Argus-Press, Owosso, MI
Associated Newspapers of Michigan, MI
At Home in Central Illinois, Champaign IL
Auburn Citizen, Sangamon County, IL

Auburn Journal, Auburn, CA
Auburn Trader, Auburn, CA
Baldwin Herald, Baldwin, NY
Battle Mountain Bugle, Battle Mountain, NV
Baxter Springs News, Baxter Springs, KS
Bellmore Herald, Bellmore, NY
Benkelman Post and News Chronicle, Benkelman, NE
Big Buck Saver (Eau Claire, Chippewa Falls, Menomonie, WI)
Bismarck (ND) Tribune
Bixby Bulletin, Bixby OK
Blackwell Journal-Tribune, Blackwell, OK
Bolivar Herald-Free Press, Bolivar, MO
Bottineau Courant in Bottineau, ND
Bowling Green Times, Bowling Green, MO
Breckenridge (TX) American
Broken Arrow Ledger, Broken Arrow OK
Brownsville States-Graphic, Brownsville, TN
Brush (CO) News-Tribune
Buffalo Bulletin, Buffalo, WY
Buffalo Reflex, Buffalo, MO
Burke County Tribune, Bowbells, ND
Burlison (TX) Star
Burlington (CO) Record
Burnet Bulletin, Burnet, TX
Cadillac News, Cadillac, MI
Cambridge Clarion in Cambridge, NE
Campbellsport News, Campbellsport, WI
Cañon City Daily Record, Cañon City, CO
Carson Press, Elgin, ND
Cass City, Cass City, MI
Cass County Reporter, Casselton, ND
Catoosa Times, Catoosa OK
Cedar County Republican, Stockton, MO
Cedar grove/Verona Observers, Cedar grove and Verona, NJ
Central Illinois Business, Champaign IL
Central Illinois Families, Champaign IL
Centralia Fireside Guard, Centralia, MO
Charles Mix County News, Geddes, SD
Charlevoix Courier, Charlevoix, MI
Charlton County Herold, Folkston, GA
Chatham Clarion, Sangamon County, IL
Chatham Courier, Chatham Township and Chatham Borough, NJ
Chester County Independent, Henderson, TN
Chippewa Herald, Chippewa Falls, WI

Chippewa Valley Business Report
Choteau Acantha Publishing Inc. ,Choteau, MT
Christian County Headliner News, Ozark MO
Chronotype Publishing Co.
Citizen Tribune, Morristown, TN
Civil War Courier, Morristown, TN
Clark Fork Chronicle, Superior, MT
Coalfield Progress, Norton, VA
Colfax Record, Colfax, CA
Collinsville News, Collinsville OK
Colorado Hometown Weekly, Longmont, CO
Columbus Advocate, Columbus, KS
Commercial Record-Resorter, Saugatuck, MI
Community News, Saratoga Springs, NY
Community Publishers, Inc., Bentonville, AR
Comstock Chronicle, Virginia City, NV
Copper County News, Globe, AZ
Cottage Grove Sentinel, Cottage Grove, OR
Coweta American, Coweta OK
Crawford County Independent and Kickapoo Scout in Gays Mills, WI
Crested Butte News, Crested Butte, CO
Crowley (TX) Star
Cuba Free Press, Cuba, MO
Cut Bank Pioneer Press in Cut Bank, MT
Daily Jefferson County Union, Fort Atkinson, Wisconsin
Daily Leader, Brookhaven, MS
Daily News, Wahpeton, ND
Daily Sentinel, LeMars, IA
Daily Sparks Tribune, Sparks, NV
Dakota Action Rocket, Wagner, SD
Dawson (MN) Sentinel
Dawson News, Dawson, GA
Dayton Courier, Dayton, NV
Delta County Independent, Delta, CO
Desert Times, Tucson, AZ
Detroit Legal News, Detroit, MI
DeWitt Times News, DeWitt, NE
Dickenson Star, Clintwood, VA
Dickinson (ND) News
Divernon News, Sangamon County, IL
Dodge County Pionier, Mayville WI
Douglas County Post-Gazette, Elkhorn, NE
Duncannon Record, Duncannon, PA
Dunn County Herald, Killdeer, ND

Dunn County News, Menomonie, WI
East Meadow Herald, East Meadow, NY
Eastern Times-Register, Roland OK
Echoes-Sentinel, Warren, Watchung, Long Hill Twp, Gillette, Millington and
Stirling, NJ
Edmond (OK) Sun
El Defensor Chieftain, Socorro, NM
El Dorado Hills Telegraph, El Dorado Hills, CA
Elk Valley Times, Fayetteville, TN
Elko Daily Free Press, Elko, NV
Elko Independent, Elko, NV
Ely Times, Ely, NV
Emmons County Record, Linton, N.D
Enderlin Independent, Enderlin, ND
Estes Park (CO) Trail-Gazette
Eureka Sentinel, Eureka, NV
Everman (TX) Star
Faribault Daily News, Faribault, MN
Farmers' Progress, Columbia, KY
Fennimore Times in Fennimore, WI
Fernley Leader, Fernley, NV
Flint Genesee County Legal News, Flint, MI
Florham Park Eagle, Florham Park, NJ
Folsom Telegraph, Folsom, CA
Foothills Marketplace, Grass Valley, CA
Foothills News, Tucson, AZ
Fort Bragg (CA) Advocate-News
Fort Morgan (CO) Times
Forum Newspaper, Inc., Nucla, CO
Franklin Favorite, Franklin, KY
Franklin Square/Elmont Herald, Franklin Square, NY
Frontier County Enterprise, Curtis, NE
Gasconade County Republican, Owensville, MO
Gatesville (TX) Messenger & Star Forum
Gaylord Herald Times, Gaylord, MI
Georgia Press Association, GA
Gilmer Mirror, Gilmer TX
Glacier Reporter, Browning, MT
Glasgow Courier, Glasgow, MT
Glen Ullin Times, Glen Ullin, ND
Glenpool Post, Glenpool OK
Grand Rapids Legal News, Grand Rapids, MI
Grant County News, Elgin, ND
Grant County Press, Petersburg, WV

Grundy County Herald, Tracy City, TN
Guthrie News-Leader, Guthrie, OK
Hannibal Courier-Post, Hannibal, MO
Hanover Eagle, East Hanover Township and Hanover Township, NJ
Harrison Daily Times, Harrison, AR
Hastings Banner, Hastings, MI
Hastings Tribune, Hastings, NE
Havre Daily News, Havre, MT
Hayes Center Times Republican, Hayes Center, NE
Hays Free Press, Buda, TX
Henderson News, Henderson, Nebraska
Herald Located, New England, ND
Herald Times Reporter, Manitowoc, WI
Hermann Advertiser-Courier, Hermann, MO
High Desert Advocate, West Wendover, NV
High Timber Times, Conifer, CO
Hillsboro Banner, Hillsboro, ND
Hitchcock County News, Trenton, NE
Hood County News, Granbury, TX
Hudson Star-Observer, Hudson, WI
Humboldt Chronicle, Humboldt, TN
Hunterdon Review, Hunterdon, NJ
Indianapolis Business Journal, Indianapolis, IN
Ingham County Legal News, Mason, MI
Jacksboro (TX) Gazette-News
Jackson County Legal News, Jackson, MI
Jackson Hole News & Guide, Jackson, WY
Janesville Argus, Janesville, MN
Jenks Journal, Jenks, OK
Joshua (TX) Star
Journal Publishing Inc. publisher of The Journal of Crosby, ND and the
Tioga Tribune, Tioga, ND
Journal-Advocate, Sterling, Colorado
Journal-Republican, Monticello IL
Julesburg (CO) Advocate
Juniata Sentinel, Mifflintown, PA
Keene (TX) Star
Kenosha News, Kenosha, WI
Kenyon Leader, Kenyon, MN
Kulm Messenger, Kulm, ND
Lahontan Valley News, Fallon, NV
Lake Andes Wave, Wagner, SD
Lake Country (TX) Shopper
Lake Country (TX) Sun

Lake County Examiner, Lakeview, OR
Lake Geneva Regional News, Lake Geneva, WI
Lakeshore Guardian, MI
LakeVille Messenger, Millington, MI
Lamar (CO) Ledger
LaMoure Chronicle, LaMoure, ND
Landmark Community Newspapers, LLC Shelbyville, KY
L'Anse Sentinel, L'Anse, MI
Laramie Boomerang, Laramie, WY
Las Vegas Review-Journal, Las Vegas, NV
Le Center Leader, Le Center, MN
Le Sueur News-Herald, Le Sueur, MN
Leader Telegram, Eau Claire, WI
Leelanau Enterprise, Lake Leelanau, MI
LH Weekly!, Morristown, NJ,
Lincoln County Record, Caliente, NV
Lincoln News Messenger, Lincoln, CA
Litchville Bulletin, Litchville, ND
Long Beach Herald, Long Beach, NY
Long Island Graphic, Freeport, NY
Longmont Times-Call, Longmont, CO
Lonsdale News-Review, Lonsdale, MN
Loomis News, Loomis, CA
Lorraine Press, Salt Lake City, UT
Loveland Reporter-Herald, Loveland, CO
Lovelock Review-Miner, Lovelock, NV
Ludington Daily News, Ludington, MI
Lynbrook/East Rockaway Herald, Lynbrook, NY
Macomb County Legal News, Pontiac, MI
Madelia Times-Messenger, Madelia, MN
Madison Eagle, Madison, NJ
Mahomet Citizen, Mahomet IL
Mail Box News, Fernley and Fallon, NV
Malverne/West Hempstead, Malverne, NY
Manchester Times, Manchester, TN
Mannford Eagle, Mannford OK
Maple River Messenger, Mapleton, MN
Marana Weekly News, Marana, AZ
Maryville Daily Forum, Maryville, MO
Mason Valley News, Yerington, NV
McIntosh County Democrat, Checotah, OK
McKenzie County Farmer, Watford City, ND
Mendocino (CA) Beacon
Merrick Herald, Merrick, NY

Milton Times Inc., Milton, MA
Mineral County Independent-News, Hawthorne, NV
Minot (ND) Daily News
Mobridge Tribune, Mobridge, SD
Monroe Publishing Co., Monroe, MI
Montmorency County Tribune, Atlanta, MI
Mount Desert Islander, Bar Harbor, ME
Mount Horeb Mail, Mount Horeb, WI
Mount Olive Chronicle, Mount Olive Township, Flanders and Budd Lake, NJ
Mountain Citizen, Inez, KY
Mountain View Telegraph, Moriarty, NM
Mt. Pleasant News, Mt. Pleasant, IA
Mt. Pleasant Shopper, Mt. Pleasant, IA
Muskegon Legal News, Muskegon, MI
Nance County Journal, Fullerton, NE
Nassau Herald, Lawrence, NY
Nebraska Journal-Leader, Ponca, NE
Neosho Daily News, Neosho, MO
Nevada Appeal, Carson City, NV
Nevada Legal News, Las Vegas, NV
Nevada Rancher, , NV
New Berlin Bee, Sangamon County, IL
Newcastle News Letter Journal, Newcastle, WY
Newcastle News, Newcastle, WA
Newport News-Times, Newport, OR
News-Enterprise, West Concord, MN
News-Monitor, Hankinson, ND
Newton County Times, Jasper, AR
Nixa Xpress, Nixa, MO
Nodaway News Leader, Maryville, MO
Norman County Index Ada, Minnesota
North Lake Tahoe Bonanza, Incline Village, NV
North Vernon Plain Dealer, North Vernon, IN
Northern Neck News, Warsaw, VA
Northern Wyoming Daily News, Worland, WY
Northfield News, Northfield, MN
Northumberland Echo, Heathsville, VA
Oakland County Legal News, Troy, MI
Observer-Tribune, Washington Township, Chester Township, Chester,
Mendham Township, Mendham and Harding Township, NJ
Oceanside/Island Park Herald, Oceanside, NY
Oregon Lithoprint, Inc, McMinnville. OR
Otis Telegraph, Washington County, CO
Owasso Reporter, Owasso OK

Owatonna People's Press, Owatonna, MN
Ozark County Times, Gainesville, MO
Pahrump Valley Times, Pahrump, NV
Palmyra Spectator, Palmyra, MO
Pauls Valley Daily Democrat, St. Pauls Valley, OK
Pawnee Post, Sangamon County, IL
Paxton Record, Paxton IL
Pennsylvania Newspaper Association, Harrisburg, PA
Perry County Times, New Bloomfield, PA
Petoskey News Review, Petoskey, MI
Pierce County Herald, Ellsworth, WI
Pike County Journal Reporter, Zebulon, Ga.
Pinedale Roundup, Pinedale, WY
Placer Herald, Rocklin, CA
Pleasant Plains Press, Sangamon County, IL
Port Aransas South Jetty, Port Aransas, TX
Port Townsend & Jefferson County Leader, Port Townsend, WA
Potter County News, Gettysburg, SD
Prairie Pioneer, Pollock, S.D
Presque Isle Newspapers, Rogers City, MI
Press-Sentinel, Jesup, GA
PrimeTime Xpress, Nassau County, NY
Prosser Record Bulletin, Prosser, WA
Pure Gold advertiser, Madelia, MN
Quad-City Times, Davenport, IA
Rantoul Press, Rantoul IL
Rawlins Daily Times, Rawlins, WY
Record-Harold, Greensburg, KY
Reno Gazette-Journal, Reno, NV
Reppert Publications, Anna, IL
Republic Monitor, Republic, MO
River Falls Journal, River Falls, WI
Riverton Register, Sangamon County, IL
Rochester Times, Sangamon County, IL
Rockaway Journal, Far Rockaway, NY
Rockville Centre Herald, Rockville Centre, NY
Rome (NY) Daily Sentinel
Roseville Press-Tribune, Roseville, CA
Roxbury Register, Roxbury Township and Mount Arlington, NJ
Sacramento Gazette, Sacramento, CA
Saint James Press, St James, MO
Sammamish Review, Sammamish, WA
San Miguel Basin Forum Newspaper, Nucla, CO
Sand Springs Leader, Sand Springs OK

Scotland Journal, Scotland, SD
Sequoyah County Times, Sallisaw, OK
Shelby Promoter in Shelby, MT
Shelton Mason County Journal, Shelton, WA
Sheridan Press, Sheridan, WY
Sidney Herald in Sidney, MT
Siuslaw News, Florence, OR
Skiatook Journal, Skiatook OK
SnoValley Star, North Bend, WA
South County Express, Sangamon County, IL
South County Mail, Rogersville, MO
South County Publications, Ltd. ,Sangamon County, IL
South Lincoln News, Lincoln, OR
South Shore Record, Hewlett, NY
Southeast Dakota Publishing, Inc., ND
Southwest Newspapers
St. Cloud (MN) Times
St. Louis/Southern Illinois Labor Tribune, St. Louis, MO
St. Peter Herald, St. Peter, MN
Stamford Times, Stamford, CT,
Staples World, Staples, MN
Statesboro (GA) Herald
Steelville Star-Crawford Mirror, Steelville, MO
Sturgis Journal, Sturgis, MI
Sublette Examiner, Pinedale, WY
Swift County Monitor, Benson, MN
Sylvania Telephone, Sylvania, GA
Texarkana Gazette, Texarkana, TX
The Aberdeen Times, Aberdeen, ID
The Advance, Vidalia, GA
The Advocate Messenger, Danville, KY
The Alma (GA) Times
The Alpena News, Alpena, MI
The Amboy News, Amboy, IL
The Arizona Silverbelt, Globe, AZ
The Ashton Gazette, Ashton, IL
The Atascadero News, Atascadero, CA
The Banner Press, Austin, Colorado and Fayette Counties, TX
The Beacon, Clifton, NJ
The Bernardsville News, Bedminster, Bernards Township, Far Hills,
Peapack/Gladstone and Bernardsville, NJ
The Bethany Republican-Clipper
The Bird City Times, Bird City, KS
The Blackshear (GA) Times

The Boscobel Dial in Boscobel, WI
The Bridger Valley Pioneer, Lyman, WY
The Brookings Register, Brookings, SD
The Bucks County Courier Times, Levittown, PA
The Budget, Sugarcreek, OH
The Burlington County Times, Willingboro, NJ
The Business Farmer, Scottsbluff, NE
The Canadian RECORD, Canadian, TX
The Canyon Courier, Evergreen, CO
The Caroline Progress, Bowling Green, VA
The Cass Lake Times, Cass Lake MN
The Catholic Times, Saginaw, MI
The Catholic Weekly, Saginaw, MI
The Center Post Dispatch, Center, CO
The Central Record, Lancaster, KY
The Central Virginian, Louisa, VA
The Chaffee County Times, Buena Vista, CO
The Chronicle, Centralia, WA
The Citizen, Boonton Township, Denville Township, Dover, Mountain Lakes,
Montville, Rockaway Borough and Rockaway Township, NJ
The Clear Creek Courant, Idaho Springs, CO
The Climax Crescent Newspaper, Kalamazoo County, MI
The Clinton County Leader, Plattsburg, MO
The Clinton Daily Journal, Clinton, IL
The Colby Free Press, Colby, KS
The Collierville Herald, Collierville, TN
The Columbia Press, Warrenton, OR
The Conejos County Citizen, Monte Vista, CO
The Country Advocate , Colby, KS
The Country Today, Eau Claire, WI
The County Star, Savoy IL
The Courier-Times.Roxboro, NC
The Current Local, Van Buren, MO
The Daily News, Iron Mountain, MI
The Daily Press, Escanaba, MI
The Daily Reporter, Milwaukee, WI
The Daily Southerner, Tarboro, NC
The Darien News in Darien, GA
The Del Norte Prospector, Del Norte, CO
The Eagle Post, Oakgrove/Fort Campbell, KY
The East Haven Courier, Madison, CT
The Eclectic Observer, Eclectic, AL
The Ellsworth American, Ellsworth, ME
The Elsberry Democrat, Elsberry, MO

The Eufaula Indian Journal, Eufaula, OK (The oldest newspaper in Oklahoma)
The Fairbury Journal-News, Fairbury, NE
The Farmers Independent of Bagley, MN
The Florence Citizen, Florence, CO
The Frankston Citizen, Frankston, TX
The Freeport Shopping News (IL)
The Glen Ridge Paper
The Gonzales Tribune, Gonzales, CA
The Goodland Star-News, Goodland, KS
The Graham (TX) Leader
The Grandview Herald, Prosser, WA
The Grant County Express, Dry Ridge, KY
The Grant County Herald Independent in Lancaster, WI
The Grant County News, Dry Ridge, KY
The Grant Tribune-Sentinel, Grant, NE
The Greenfield News, Greenfield, CA
The Gretna Guide & News, Gretna, NE
The Guernsey Gazette, Guernsey, WY
The Guilford Courier, Madison, CT
The Hanska Herald, Hanska, MN
The Harbor News, Madison, CT
The Hebron Journal, Hebron, NE
The Herald Chronicle, Winchester, TN
The Herald Democrat, Leadville, CO
The Herald Progress, Ashland, VA
The Herald-Gazette, Barnesville, GA
The Highlander, Marble Falls, TX
The Hillsboro Sentry-Enterprise in Hillsboro, WI
The Holyoke Enterprise, Holyoke, CO
The Honker, Middle River, MN
The Hour, Norwalk, CT,
The Humboldt Sun, Winnemucca, NV
The Huron Plainsman, Huron, SD
The Imperial Republican, Imperial, NE
The Independent News-Gazette, Georgetown, IL
The Independent Press of Bloomfield
The Independent, Massillon, OH
The Independent, Monroe County, MI
The Independent-Journal, Potosi, MO
The Independent-Observer, Conrad, MT
The Intelligencer, Doylestown, PA
The Interior Journal, Stanford, KY
The Issaquah Press, Issaquah, WA

The Jack County (TX) Herald
The Jackson County Star, Walden, CO
The Jessamine Journal, Nicholasville, KY
The Jewish Star, New York City and Long Island, NY
The Johnstown Breeze, Johnstown, CO
The Jones County News, Gray, GA
The Journal-Enterprise, Providence, KY
The Karnes Countywide, Karnes City, TX
The Kemmerer Gazette, Kemmerer, WY
The Lake Powell Chronicle, Page, AZ
The Lander Journal, Lander, WY
The Leader, Covington, TN
The Leader, St. Joseph-Ogden IL
The Lincoln County Journal, Troy, MO
The Lingle Guide, Lingle, WY
The Llano County Journal, Llano, TX
The Louisiana Press-Journal, Louisiana, MO
The Lusk Herald, Lusk, WY
The Lyons Recorder, Lyons, CO
The Marion Press, Marion, MI
The Marshfield Mail, Marshfield, MO
The Mendota Reporter, Mendota, IL
The Milan Standard, Milan, MO
The Millington Herald, Millington, MI
The Minden Courier, Minden, Nebraska
The Mineral County Miner, Crede, CO
The Mining Gazette, Houghton, MI
The Mining Journal, Marquette, MI
The Missaukee Sentinel, Lake City, MI
The Monday Extra, Norton, KS
The Monroe County Reporter, Forsyth, GA
The Monroe Shopping News (WI)
The Monroe Times (WI)
The Monte Vista Journal, Monte Vista, CO
The Moody County Enterprise, Flandreau, SD
The Moore County News, Lynchburg, TN
The Morris News Bee, Morris Plains, Morris Township and Morristown, NJ
The Mountain Mail, Salida, CO
The Mountain Statesman, Grafton, WV
The Nebraska Signal, Geneva, Nebraska
The New Richmond News, New Richmond, WI
The Newberry Eagle, La Pine, OR
The News Guard, Lincoln City, OR
The News-Gazette Corp, Lexington, VA

The News-Gazette, Champaign IL
The News-Messenger, Fremont, OH
The News-Sun, Newport, PA
The North Haven Courier, Madison, CT
The North Vernon Sun, North Vernon, IN
The Northern Michigan Review, Petosky, MI
The Northwoods Press, Nevis MN
The Norton Telegram, Norton, KS
The Obelrin Herald, Oberlin, KS
The Observer News Enterprise, Newton, NC
The Ogle County LIFE, Oregon, IL
The Olney (TX) Enterprise
The Ozona Stockman, Ozona, TX
The Park County Republican and Fairplay Flume, Bailey, CO
The Paso Robles Press, Paso Robles , CA
The PayDay/Print Shop, Huron, SD
The Phonograph-Herald in St. Paul, NE
The Pinconning Journal, Pinconning, MI
The Plains Reporter, Williston, ND
The Platt County Merchant, Wheatland, WY
The Platteville Journal, in Platteville WI
The Post, Big Stone Gap, VA
The Power County Press, American Falls, ID
The Progress, Caldwell, Essex Fells, Fairfield, North Caldwell, Roseland and West Caldwell, NJ
The Randolph Guide, Asheboro, NC
The Randolph Reporter, Randolph and Mine Hill, NJ
The Ranger, Riverton, WY
The Record Delta , Buckhannon, WV
The Record Times, Wheatland, WY
The Record-Courier, Gardnerville, NV
The Record-Review, Abbotsford, WI
The Redfield Press, Redfield, SD
The Register-Pajaronian, Watsonville, CA
The Repository, Canton, OH
The Republican Journal in Darlington, WI
The Retrospect, Collingswood, NJ
The Richland Observer in Richland Center, WI
The Riverdale Press, Bronx, NY
The Rochelle News-Leader, Rochelle, IL
The Rocket-Miner, Rock Springs, WY
The Rustler, King City, CA
The Saint Francis Herald, St. Francis, KS
The Saratogian, Saratoga Springs, NY,

The Sebekka Menahga Review Messenger, Sebekka MN
The Sentinel, Cheyenne, WY
The Shopper Times, Lebanon, MO
The Soledad Bee, Soledad, CA
The Sound, Madison, CT
The Source, Madison, CT
The South Fork Times, South Fork, CO
The Splash, Liberty Lake, WA
The Star News, Medford, WI
The Statesman, Kewaskum, WI
The Suburbanite, Green, OH
The Sun-Times, Williamsville and Sherman, IL
The Tallassee Tribune, Tallassee, AL
The Telfair (GA) Enterprise, McRae, GA
The Thomasville Times, Thomasville AL
The Three Lakes News, Eagle River, WI
The Times-Reporter, , OH
The Torrington Telegram, Torrington, WY
The Tribune-Phonograph, Abbotsford, WI
The Uinta County Herald, Evanston, WY
The Valierian in Valier, MT
The Valley Courier, Alamosa, CO
The Valley Courier, Madison, CT
The Vandalia Leader, Vandalia, MO
The Walsh County Record, Grafton, ND
The Wauneta Breeze, Wauneta, NE
The Westfield Leader & The Scotch Plains-Fanwood Times, Westfield, NJ
The Wetumpka Herald, Wetumpka, AL
The Wilton Villager, Wilton, CT,
The Winchester Sun, Winchester, KY
The Wind River News, Riverton, WY
The Wolbach Messenger in Wolbach, NE
The Zeeland Record Co., Zeeland, MI
Times Leader, Princeton, KY
Times Printing Company, Random Lake, WI
Times Tribune, Beaver City, NE
Tonopah Times-Bonanza, Tonopah, NV
Tradin' Post Buyer's Guide (Eau Claire, WI)
Trail County Tribune, Mayville, ND
Tri-City Register, Sangamon County, IL
Tri-City Reporter, Dyer, TN
Tri-County Press in Cuba City, WI
Troublesome Creek Times, Hindman, KY
Tullahoma News, Tullahoma, TN

Tulsa Business Journal, Tulsa OK
Tulsa Daily Commerce and Legal News, Tulsa OK
Union Enterprise, Plainwell, MI
Valencia County News-Bulletin, Belen, NM
Valley Stream Herald, Valley Stream, NY
Vandalia Leader, Vandalia, MO
Vermillion Plain Talk, Vermillion, SD
Vernon Daily Record, Vernon, TX
Vian Tenkiller News, Vian OK
View Newspaper Group (publisher of 14 newspapers), MI
Vilas County News-Review, Eagle River, WI
Voice News, Hickman, NE
Wagner Post, Wagner, SD
Wagoner Tribune, Wagoner OK
Walhalla Mountaineer, Walhalla, ND
Wallis News-Review, Wallis, Texas
Waseca County News, Waseca, MN
Washtenaw County Legal News, Ann Arbor, MI
Wayne County News, Waynesboro, TN
Wayne County Outlook, Monticello, KY
Weiser Signal American, Weiser, ID
West Essex Tribune, Livingston, NJ
West River Eagle, Eagle Butte, SD
Westmoreland News, Montross, VA
Wetumpka Weekend, Wetumpka, AL
Wilber Republican, Wilber, NE
Wilkes Journal-Patriot, North Wilkesboro, NC
Williamson County Sun, Georgetown, TX
Williston (ND) Herald
Winnebago Voice, Winnebago, MN
Wise County Messenger, Decatur, TX
Wyoming Tribune Eagle, Cheyenne, WY
Xpress Coups, Nassau County, NY
Yale Expositor, Yale, MI
Yankton Daily Press and Dakotan, Yankton, SD
York News-Times, York, NE
Zion Benton News, Zion, IL