
BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ADVANCE NOTICE OF PROPOSED RULEMAKING
REGARDING PERFORMANCE INCENTIVE
MECHANISM

Docket No. RM2021-2

**REQUEST FOR EXTENSION OF
INITIAL COMMENTS DEADLINE**

**NATIONAL ASSOCIATION OF
PRESORT MAILERS**
(March 29, 2021)

The National Association of Presort Mailers (“NAPM”) respectfully submits this request for the Postal Regulatory Commission (PRC) to extend the current April 14, 2021, deadline for initial comments in this proceeding. NAPM bases its request for an extension on several recent developments, as outlined below.

First, the USPS on March 23, 2021, unveiled a new 10-year strategic plan which includes a variety of anticipated changes. In its Advance Notice of Proposed Rulemaking (ANPR) RM2021-2, the PRC notes that the proceeding “is initiated to explore whether additional regulatory changes may be necessary to promote longer-term financial stability, increased efficiency and cost reductions, while maintaining high-quality service standards, and if so, how to best design these potential changes.” Without fully understanding the details of the USPS new strategic plan as well as timing for the various significant changes included in the plan, NAPM contends that it is premature to be able to determine whether an additional performance-based incentive is necessary and to what performance metrics any incentive or penalty

should be based on. The USPS obviously has developed a plan that it believes will achieve long-term financial stability, and that plan does not include any performance-based incentive. While we do not yet fully understand all the elements of the new strategic plan, we believe there may be alternative or additional measures the USPS could take to improve its long-term financial stability without additional performance incentive-based rate authority. Lacking a better understanding of the USPS' new plan, it would be difficult if not impossible to determine what additional performance-based mechanisms should be considered.

Second, the USPS has initiated a request for an advisory opinion from the PRC on changes to service standards for First-Class Mail and Periodicals (N2021-1), and has scheduled a public conference on April 6, 2021. Since one element of the Performance Incentive Mechanism discussion the PRC has asked for feedback on is whether additional regulatory mechanisms are needed to ensure that the USPS maintains high quality service standards...it is confusing to NAPM how we effectively carry on that discussion at the same time as the USPS is proposing to lessen service standards.

Third, over the last week, the USPS has filed at least five new proceedings that will require stakeholder mailing associations, including NAPM, to participate which will put a significant amount of pressure on staff and member resources in an attempt to provide the PRC with meaningful feedback as well as identifying instances where more information is needed in order to respond. NAPM would appreciate the Commission's consideration of the impact of these multiple proceedings being filed at the same time --with more expected to come -- when it establishes procedural schedules and comment deadlines.

About NAPM. NAPM represents mail owners preparing their own mail, mail service providers (MSPs) that presort and commingle client mailings, mail service providers that perform printing and other mail-related services, and vendor solutions providers to the mailing industry. Mail processed by NAPM members in FY2020 represented \$7.9 billion in USPS postage. Our MSP members interact with, and collect mail from over 23,700 business mail consumers, providing them with access to affordable postage prices, excellent customer service, and add value to their mail by presorting, commingling, barcoding and more so that the client can receive the benefits of workshare postage discounts with minimal involvement with the complex mailing standards required by the Postal Service. Collectively, NAPM represents over 45 percent of the total commercial First-Class Presort Mail volume and over 60 percent of the USPS' total IMb Full-Service volume. NAPM members in FY2020 provided the USPS with Intelligent Mail data on over 21.7 billion pieces of mail – data that supports a long list of USPS initiatives to reduce costs, plan more effectively, improve service and grow revenue. While NAPM members present a significant volume of First-Class Mail, our members also present a growing volume of Marketing Mail, as well as handling Periodicals, Package Services and competitive parcel products.

Respectfully submitted,



Robert Galaher
Executive Director and CEO

NATIONAL ASSOCIATION OF PRESORT MAILERS
PO Box 3552
Annapolis, MD 21403-3552
(877) 620-6276