



January 18, 2008

Postal Regulatory Commission (PRC)
901 New York Ave., N.W., Suite 200
Washington, DC 20268-0001

The United States Postal Regulatory Commission issued Order 48 - NOTICE OF REQUEST FOR COMMENTS ON SERVICE PERFORMANCE MEASUREMENT SYSTEMS FOR MARKET DOMINANT PRODUCTS on December 4, 2007, and later modified on December 11, 2007

The Association for Mail Electronic Enhancement (AMEE) is comprised of Corporations which own or send mail through the USPS, the majority of which are First-Class mailers, and trade associations whose members are corporations with a primary interest in mailing in the United States, the majority of which reflect the interests of First-Class mailers; and Corporations and other entities that are engaged in developing and/or promoting technology in the area of mail electronic enhancement. We are pleased to provide comments to the proposed standards:

We commend the USPS for its efforts and AMEE believes that the USPS proposal for service performance measurement will provide a high level solution that can minimize costs. Combining IMB data with an expanded EXFC infrastructure will provide best features of newly available data with an externally managed data collection and reporting system. We recommend the USPS continue the work began in MTAC 114, through the addition of workgroups to specific requirements to support the proposed measurement. We believe early and participative engagement of the industry will provide a stronger and better supported measurement system.

1) First-Class Presort Measurement Approach

AMEE's membership of first class mailers and supporting vendors agrees that the "start-the-clock" and "stop-the-clock" elements are critical to service measurement and that the "start-the-clock" must be based on the CET needed to best integrate the work content of the mail with processing capacity and transportation networks, not an arbitrary CET. AMEE recommends the USPS better define how CET will be established and communicated to the mailing industry. Another major concern is electronic mailing information which will be used to get an accurate "start-the-clock." Several MTAC workgroups are continuing their work to define the Intelligent Mail requirements for January 2009, and member companies are also evaluating internal requirements. However, to date there is not a published standard for what needs to be included in the

electronic documentation. Such lack of clarity places a service performance system at risk. Resources to program, test and deploy and fully implement may put the establishment of a measurement system at risk.

2) First-Class Presort Flats measured by EXFC

Consistent with others in the mailing industry, AMEE disagrees with the USPS intention to use EXFC as a proxy for First-Class presorted flats. We recognize the volumes are small, however, in order to qualify for automation rates mailers are being required to adopt the use of the IMB and other processes that are identical between letters and flats. It would seem the flat measurement system should be the same as letter mail process.

3) First-Class Presort Stop-the-clock

AMEE supports the approach for determining the delivery performance using the hybrid system. The tested EXFC infrastructure and external reporters will add credibility to the overall measurement system.

4) First-Class Presort Reporting

AMEE suggests that volume be included for every report so Commission, mailers and the public can see the relative weighting. Also, there should be some capability to capture early delivery of the mail. Early delivery statistics could be valuable to the Commission in analyzing service standards.

The USPS proposed Service Performance report needs to be provided on a monthly basis and report down to the 3-digit level. Based on USPS estimates there should be sufficient volumes to report monthly.

5) Intelligent Mail Adoption

AMEE supports the expectation of a rapid adoption rate for Intelligent Mail, particularly in light of the current January 2009, requirement for automation discounts. Uncertainty could affect that expectation depending on the actual rate incentives for full and basic IMB services. In addition, undefined requirements or overburdening the mailers with data requirements are of concern to AMEE members, including generating the data, archiving the data, and transmitting the data. Another major concern of AMEE is the USPS IT infrastructure and its to have systems in place to receive the data from both the mailer and their operations scans.

AMEE member companies are at the forefront of the industry in adopting Intelligent Mail technology and products, and also hold leadership roles on MTAC workgroups. We fully support the USPS effort to develop a measurement system that can build confidence in reliable, consistent delivery of First Class mail. We appreciate the opportunity to provide these comments and will continue to work closely with USPS to develop improved processes.

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