

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

Notice of Price Adjustment

Docket No. R2009-2

**DECLARATION OF JANYCE S. PRITCHARD
OF THE FLUTE NETWORK ON THE
PRICE ADJUSTMENT FOR CONFIRM SERVICE**

1. My name is Janyce S. Pritchard, and I am the owner and publisher of The Flute Network. I am responsible for the development, production and coordination of content for each of our printed issues as well as our online offerings, and for maintaining and updating our list of subscribers for each of our mailings.

2. I am submitting this declaration on behalf of The Flute Network, in support of the separately filed Platinum Coalition comments. The Flute Network is deeply concerned with the Postal Service's plans to increase the price to mailing agents of the Platinum subscription for Confirm service to \$250,000.

3. The statements herein are made to the best of my knowledge, information and belief.

I. The Flute Network

4. The Flute Network is an entirely volunteer, non-profit, educational and service entity, now in our 25th year of service to flutists and flute teachers nationwide (...and the people who love them). Our primary offering is a printed adletter which is

designed and run to be a bulletin-board service – each issue goes out free of charge, via the USPS Mails, to some 6,100 different flutists and flute teachers 10 times a year. Our entire purpose is to help people get word out about things as economically and efficiently as possible (for example, instruments for sale or ones they maybe looking for, notices of stolen instruments, information about masterclasses, new offerings or auditions or jobs, concerts, requests for help with special projects, etc.). We mail out as a letter (a basic 8 ½ x 11 inch format, folded in half to be 5 ½ x 8 ½ with two tabs along the top, the first fold on the right side of the addressed panel, and the final fold along the bottom), under a Non-Profit Standard Mail permit. We also maintain a website, as has become mandatory for just about any business alive today. The Flute Network is an entirely volunteer operation – all revenues received go directly to production, printing, operational, and mailing costs.

II. The Flute Network Is Committed to the Mail

5. I continue to be passionate about keeping Flute Network primarily a mailed product even as the challenges to doing that continue to mount, because the one message that consistently comes through loud and clear from our subscribers is that they WANT their paper copy coming to them in the mail. Even in 2009, there remain a very respectable number of people who do not wish to have to go online for everything; indeed some who are on our list who totally refuse to have anything to do with the internet at all. It is my hope to continue to serve them by continuing to mail out The Flute Network for as long as possible.

6. The Flute Network and I have been honored to share information and insights with the PRC before – the first time was as part of the 2006 Rate case, where I

shared our findings from our first internal study of the pace of flow of two issues of Flute Network in the mail as they moved from east to west in 2006. In 2007 we replicated that study because we'd switched to working with a new printer here in California (instead of North Carolina) and we had wanted to understand if flowing from west to east might be any better (...it wasn't...).

7. Just after that, in 2007, I was honored to be a part of the MTAC Workgroup 114, and our findings from that 2007 study were shared in that forum. Later - as part of the work of that Workgroup, Flute Network teamed with GrayHair Software and together we tracked the flow of two more issues of Flute Network, this time via Intelligent Mail Barcodes with Confirm.¹ Our findings from the Confirm data on both the July/August and the September/October issues completely validated the conclusions Flute Network had reached in both our 2006 and 2007 studies, and this information contributed to our collective Workgroup efforts that fall.

8. By the end of 2007, having learned that our local USPS Business Mail Unit had put in place new practices for processing the mails, Flute Network replicated our study with our subscribers for what we thought would be the last time with the February and March 2008 issues – all in hopes of seeing if the new USPS practices might have helped. (Locally, at least, we found they did...we found there was not much difference nationally, however.)

¹ The MTAC Workgroup was particularly interested in seeing if the delays in Flute Network could be explained by the pieces going unprocessed via machine – the Confirm data on the July/August 2007 issue showed that our pieces were indeed, entirely, machined. The question then turned to whether or not our having the first fold on the left side instead of the right side of our address panel section could explain the problems, so we ran IMB/Confirm on the Sept/Oct 2007 issue which had been reformatted to address that concern. The Confirm data showed absolutely no difference in the pace of delivery between the two issues. All of this info was shared with the MTAC Workgroup, and remains available at Flute Network's website.

9. Towards the end of August 2008, The Flute Network was honored to begin an extended collaboration with GrayHair Software. Our issues from the Sept/Oct 2008 through February 2009 have all carried Intelligent Mail Barcodes with Confirm (OneCodeIMB's went out on three out of the five of those). After our September/October issue went out, with the Confirm data coming in, I was notified by a number of our subscribers of the dates they'd received their issues² and noticed that these dates didn't quite match up with that given as the final exit scan in the Confirm data. So we recently initiated yet one more postal study with our February 2009 issue to look at exactly that issue, and we are currently in the early analysis stages of that investigation.

III. The Flute Network, its Sponsors, and its Subscribers Benefit Greatly From the Value-Added Confirm Services of GrayHair Software

10. The Flute Network uses the information from Confirm primarily in three ways: (1) to knowledgeable counsel those planning the timing of their ads and notices so that they might reach our subscribers in time for it to do any good; (2) to help those who've run ads or notices to understand why they are or are not getting responses to those ads or notices, as related to good information about when subscribers in the various parts of the country most likely actually received their issues; and (3) to continue to track actual delivery performance by the USPS for The Flute Network as it compares to the wider and more general delivery performance data offered by the USPS, especially as regards the needs, concerns, and confusions, of our advertisers and subscribers.

11. Although I understand it is possible to receive the Confirm data directly from the USPS, The Flute Network does not have the computer capacity to receive it all,

² We have some very devoted subscribers, who voluntarily send me this information on receipt of their issues even when it's not specifically requested. Such devotion is never discouraged.

and I have neither the ability to manipulate the raw data scan information nor the programming skill needed to turn it all in to anything relevant for the purposes described above. GrayHair Software services are crucial to The Flute Network for those reasons (among many others). Without their support, expertise, and skill - we absolutely would not participate in Confirm.

12. In conclusion, and perhaps even more fundamentally, the Flute Network is concerned that the increase in the price of the Platinum subscription would jeopardize its receipt of many ongoing supportive services provided by GrayHair Software. Without such services, the Flute Network will very likely stop mailing all together, and go to the online-only form that we so very much wish to avoid. I therefore respectfully ask this Commission to mitigate the price increase for Confirm for mailing agents at the Platinum service level.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: _____

Janyce S. Pritchard
The Flute Network