

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

**Notice of Price Adjustment**

**Docket No. R2009-2**

**DECLARATION OF WANDA SENNE  
CONCERNING THE  
PRICE ADJUSTMENT FOR PLATINUM CONFIRM SERVICE**

1. My name is Wanda Senne, and I am employed by World Marketing, Inc. as National Director Postal Development. I establish and maintain ongoing communications between the USPS and World Marketing's six national business units. I develop, and implement postal training programs for all areas within World Marketing and consult with clients on their mail programs.

2. I am submitting this declaration on behalf of World Marketing in support of the separately filed Platinum Coalition comments. World Marketing opposes 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. How World Marketing Works With Confirm Data and Adds Value to Our Client's Mailings**

4. The USPS' raw Confirm scan data is an unrecognizable flat file with process operations codes, dates, times, and facility identifiers. World Marketing's InsideTrack® product

uses this raw data and translates it into the reporting interface that is fast, and very user friendly. Our clients simply do not have the information technology resources that would enable them to gain any benefits from a CONFIRM subscription in the absence of our product.

5. World Marketing developed InsideTrack®, an intelligent tracking, reporting and expediting service that keeps mail on track so it is delivered to our client's customers, prospects, or donors at just the right time to coordinate with any of their other media communications and efforts. We track the following types of mailpieces:

**Outbound Mail:** One-day sales events, grand openings, debit cards, gift certificates or valuables, retail promotions, medical, legal or confidential mailings. For these types of mail, Inside Track increases store traffic for store managers, and improves late or non-delivery in poor USPS delivery areas.

**Inbound Mail:** Orders and payments. For inbound mail, Inside Track enables our clients to anticipate and staff for sales or fulfillment, eliminate late notices, trigger thank you notes (primarily nonprofit) to donors. This allows our clients to mail ADDITIONAL pieces in a timely fashion and increase their donor loyalty and contribution levels.

6. Our reporting and delivery data interface has been a product of increasing value for our clients beginning in late 1998 when the Confirm program was first introduced. We have spent \$500,000 developing the InsideTrack product. InsideTrack helps our clients make informed business decisions using state-of-the-art graphics to illustrate summary mail delivery data. Daily status reports are available online or downloadable in multiple formats. The online, intuitive screens are color coded indicating early, on-time, and late delivery by state, county, and even down to the ZIP code level. Our clients can even select their specific store's sales territory for reporting tailored to each store manager's area of responsibility.

7. Our clients receive automatic email notification of their mail's progress through the USPS' distribution network according to their specific requests and needs. This additional intelligence was built into our InsideTrack product after several years, and over two hundred thousand dollars of investment.

8. The on line reporting system is populated with hourly Confirm piece scan activity and EMD shipment/pallet arrival at USPS Facility entry scan data that World Marketing processes through our proprietary data programs that estimate delivery. In addition to the Confirm scan data, we also have integrated USPS' ADVANCE reporting and our own call center communications with the USPS delivery supervisors using our proprietary telephone database.

9. Our clients use us for their mail promotions because we do an outstanding job of getting their outgoing mail delivered on time. We can do this in part because our Inside Track product enables us to monitor the Postal Service's delivery of our clients' mail through the integrated use of the Confirm data.

10. Our clients who take advantage of our Inside Track product include retail store owners – small local locations and major national retailers, government agencies, and nonprofit organizations. In the absence of our product, these organizations would not have a platform to utilize CONFIRM scans.

## **II. How World Marketing Will Likely Respond To a \$250,000 Platinum Price**

11. Historically, when our clients requested mail tracking we typically coded only 2 to 4 percent of the mail pieces. More recently, we have migrated much of our Confirm tracking to the IMb and code 100 percent of the mailpieces. This has allowed for individual tracking of pieces. Individual piece tracking has some advantages. For example, we can address the

question whether a specific person or business has received the mailpiece (based on predicted delivery). If the new price adjustment is implemented, however, we will return to monitoring only a small percentage of the mail, and will code only the mail for the specific addresses the client requests (company executives, seeds).

12. Many of our clients feel that the USPS should provide tracking at no charge to help support the PAEA service reporting requirements. If the Confirm pricing becomes unrealistic, we will obtain Confirm scan data on fewer pieces. Because we have migrated to using the IMb, the USPS will still have scan information through their Full Service regulations, but individual mail owners will NOT have the same data to help support their other media needs and help assure timely delivery. The USPS service performance reporting is very new and utilizes only data from their pilot partners. The anticipated pricing of Confirm will withhold from mailers information on the performance of their mailings relative to standard.

13. Many of our clients are provided the InsideTrack service as an added value for doing business with World Marketing, for no additional fee. If the price adjustment is implemented, we would need to charge for this added-value service, and we estimate most of our clients would elect to end their use of CONFIRM data.

14. Given the budget pressures on clients and industry, we are not likely to aggressively develop products utilizing Confirm, as we expect our clients will not be able to pay to cover our development expense.

15. **Because we anticipate that facing any increase in price in the current economic climate, our clients would decline to continue using our Inside Track service, we will not pay the \$250,000 for a platinum Confirm subscription.** We would drop back to a Gold level and return to coding and monitoring a small percentage of mail pieces. Thus, we

believe the USPS overestimates its expected revenues for Platinum subscription level.

Moreover, it is an additional burden on both the USPS and their “customers” to have to monitor and “babysit” the number of scans received.

16. We expect that the excessive Platinum pricing is likely to lead to consolidation of the industry overall, and far fewer subscribers than the Postal Service anticipates.

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

Executed on: \_\_\_\_\_

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