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Postal Regulatory Commission
901 New York Avenue, NW, Suite 200
Washington, DC 20268-0001

Re: Docket No. R2009-3 – Standard Mail Volume Incentive Pricing Program

Dear Mr. Chairman and Members of the Commission:

IWCO Direct is one of the nation's leading service providers in the direct marketing industry. In partnership with our customers, we are responsible for nearly two billion pieces of letter-sized Standard Mail each year. IWCO Direct and our customers are vitally interested in the long-term financial stability of the U.S. Postal Service and the continued viability of direct mail as a marketing medium.

We are encouraged to see the Postal Service taking advantage of the pricing flexibility made available to it in the Postal Accountability and Enhancement Act (PAEA). We strongly support pricing initiatives designed to arrest the recent precipitous decline in mail volumes. The Standard Mail Volume Incentive Pricing Program, otherwise known as the Summer Sale, is a solid first step down that path.

The Postal Service should be given great latitude in exercising its pricing flexibility, with the opportunity to propose and try new approaches, and to use the knowledge gained from those experiences to enhance future proposals.

The current proposal is a good first effort. Going forward we encourage the Postal Service to offer earlier notification for future proposals to support better industry planning to participate in such pricing initiatives. Eligible participants should be defined earlier in the process and the calculation of rebates or discounts should be simplified to remove barriers to mailer participation.

We appeal to the Commission to act quickly and affirmatively on the current proposal to allow as much time as possible for mailers to plan and execute new mail volume for July through September.

Thank you for providing a mechanism for mailers to comment on the Postal Service's innovative proposal.

Kind regards,

James N. Andersen
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