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

Re: Docket MT2011-3, Marketing Mail Made Easy

Honorable Commissioners:

Globe Direct is a Total Market Coverage (TMC) mailer that drops 1,250,000 shared mail packages every week in the Metropolitan Boston area. We believe we already offer an economical advertising route for the small and medium size businesses in our area. We are quite sure that many other TMC mailers, couponers and local shoppers offer the same services we do.

This proposed program effectively takes customers away from mailers that have partnered with the USPS. It also seems to skirt the permit fees issue by allowing mailers to drop mail without paying annual fees.

Large volume mailers, like Globe Direct and other NAAD members, work closely with the USPS to manage costs and revenues as a team. This program pushes that relationship aside and will not raise postal revenues due to its complexity at the carrier level.

Most mail from members of the National Association of Advertising Distributors (NAAD) has already had the addresses validated and cleaned of DNM. This program would allow multiple bundles of advertisements to arrive at a delivery unit along with a "do not deliver" manifest. Think of the burden the carrier will have on the route.

This additional mail will not only complicate the carrier's duties but will significantly impact the timeliness of our products delivery. Who will decide what mail goes out the door on a busy day? If there are two MMME mailings, a long standing TMC product and a town's newspaper all going out with weekend sales in all of them who will pick and choose what the carrier can take?

TMC mailers, as well as the other mailer I've listed above, allow the small advertiser to economically reach their customers. We do that within the well defined regulations of the USPS right now. Why would adding another, more complicated mail stream help?

I appreciate your time, but I must speak against this program.

Richard Dempsey
Manager, Quality Assurance
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