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January 31, 2011

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
901 New York Avenue NW, Suite 200
Washington, DC 20268-0001

Re: Docket No. MT2011-3 Market Test—Marketing Mail Made Easy

Honorable Commissioners:

I am deeply concerned about the re-emergence of unaddressed mail for letters on city carrier routes. It was a horrendous error in the early 50s, and it will lower the general opinion of the USPS if it returns now—especially after the super and progressive improvements generated by the modern day USPS!

I have some strong memories of this whole matter because I was there—working in the industry in my father's mail shop--in the 1950s and through the eventual recovery and have stuck with it for a lifetime. Over time, I saw our company's volume of bulk rate mail (now Standard Mail) grow from less than a million pieces a year to over 400 million pieces annually that got solid results from our customers—mostly retailers and fund raisers who kept the volume up for the USPS and dynamic grown both for themselves and the USPS!!

In 1968 we helped Wal-Mart in its early growth by working to promote their Grand Openings through direct mail when they opened their 8th store in Arkansas. We continued serving them (except during a brief hiatus about 1970 when they switched to newspaper inserts). It was not successful and they soon returned to direct mail as their medium of choice. By 1991 we were mailing about 23,000,000 sale mailers each month as they grew tremendously!

Our company, Harry Turner and Associates, Inc., closed in 1992. When it closed, I joined National Mail in Houston, then went to Harte-Hanks to work in the arena of direct mail for retailers before joining ACE Mailing in Atlanta before it became a division of World Marketing, Inc. in the mid 90s.

And, I still work in the direct marketing industry...and more specifically selling leading edge computer programs to promote and improve ROI for direct mail and direct marketing companies through target marketing. I am working with former business associates at EQ3 Partners in Dallas to promote direct mail success.

After some 15 years of volunteer work as a regular participant (nearly 30 days per year) at the Mailers Technical Advisory Committee (MTAC) and as the first non-postal

recipient of the USPS Partnership for Progress Award, I am stunned to see this VERY poor idea come back to the table.

But, unaddressed mail for city carrier routes again?? I just can't believe it!! After the awful results in the early 1950s, I cannot believe that this terrible idea has raised its ugly head again.

Unaddressed bulk mail was a terrible idea back then and it would be even worse today! So much waste...no decent delivery stats to get the number of addresses on a route...and a much-abused product by retailers...and it didn't help the mail volume. In fact, it hurt it dramatically for many years—both by retailers who would no longer mail and by the tremendous increase in waste disposal by the Post Office.

When I mention “waste,” I remember how impossible it was to get carrier counts in those days. Even if you called for them twice a week, they were different—and you had to call every Post Office or every “zone”—in big cities (long before we had zip codes). And, this was in the days when there were no consistent reports on vacancies, or seasonal mail etc. I do understand that the USPS may now provide a website for mailers to download carrier route counts (rather than the mailer calling Post Offices for them), but I do not believe that consumer choices (seasonals) have been addressed nor vacancy codes included. If not, the huge waste disposal problem will be even larger!! That's awful!!!

When those days ended, the unaddressed mail was relegated to politicians and governmental mail. It destroyed the image of the mail, the Post Office and mailers...and that was in the era of one and a half cent postage. If computers had not been developed and proliferated in the 1960s and 1970s to help direct mail companies, we might still be mired down in very low mail volume in the 1980s and 1990s today.

The USPS has done a wonderful job with its Address Information Service in cleaning up the nation's addresses and requirements for clean mailing lists by Move Update and other services. The computer has been a tremendous aid to the mailing industry and now you want to throw out all those improvements in image and results? I simply can't believe it!! Targeted mail works!! Unaddressed mail won't!! It didn't back in the 50s and it surely won't today!!

I would hate to see unaddressed mail come back to cripple the USPS again!! This is a new and progressive time...and unaddressed mail is a very poor idea!!

Sincerely,

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