

February 2, 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 troubled by the plan to re-insert unaddressed mail for letters on city routes. Unaddressed flats in this arena are at best image negative and letters are plainly just misplaced remixing of long vacated methods. While these ideas are not new, some of the hostile accompanying issues are both very emotional and contemporary.

Today we have the “Green Movement”, privacy advocates, and politicians all looking at ways to score points at the USPS expense. The greens don’t care about facts. They are dead set on convincing the public that a full mailbox is kindling for global warming and that we are destroying Bambi’s habitat cutting trees to print all this mail. Privacy folks are pushing “Do Not Mail” legislation anywhere they find a foothold. Never mind that if successful the economic blow could be debilitating. Lastly, the politicians are again jumping in on some postal bashing. I even heard John McCain on national TV comment on the ‘tremendous waste’ in the postal service and lament that it needed housecleaning.

I can not understand why anyone would want to put forth a market test that will do nothing but feed this three headed dragon. We will start to see mail pieces that will degrade the current quality that has been a decade long campaign in mail piece design. The carriers will be unable to accurately track and pull the “do not delivers” from multiple mailings that may be getting simultaneous delivery. Finally, it is a public relations nightmare for protecting the sanctity of the mail box. The naysayers will be front and center looking to kill off advertising mail as we know it.

People will see that mail quality is declining. The postal service will not be able to make the ‘do not deliver’ pulls and the result will be like throwing out chub for the politicians. “Do not mail” legislation will pop everywhere to protect constituents for this perceived deluge of unwanted mail. The mail will not be integrated with the other mail for the carrier. The green movement will back the effort. In the end, volume will decline and post office closings will be less political and more pragmatic.

This project is being sold to help the little to mid-range guy in the mail marketing. You are selling against shared-mail. They do a very thorough job of convincing that same market to use their concept at a cost of less than .5 cents per household. Yes 0.5 cents, not 5.0 cents or even 10 cents. Direct mail processors sell against this market daily. It is not easy.

Finally, I have to question the ability of counter personnel at the branches being able to efficiently deal with the customer. This is not selling 10 stamps and making change for a five dollar bill. A minimum of twenty minutes is what we look at to delineate a market area and approve counts for a prospective mail client. We have maps on screen and comparative demographic data available to assist in the decision. It seems someone has grossly underestimated the complexity of this issue.

I have spent a good deal of the last 40 years building up the merits of direct mail advertising. I am deeply concerned that this misguided peek into Pandora's Box will open the flood gates and cause irreparable damage to our postal system.

Respectfully,

Robert L. Faris, Jr.
Faris Mailing, Inc
5517 W. Minnesota St.
Indianapolis, IN 46241-3821