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February 4, 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:

Background:

Calmark has been serving the direct mail industry for over 50 years. We mail approximately 500 million pieces of mail annually. While we handle all classes of mail the majority of our mail is Standard Class letter size mail. We also serve primarily the nonprofit segment of the industry. I have worked in the direct mail industry since 1977 and have been at Calmark for 30 years.

I am submitting my comments because I believe the industry needs a financially strong USPS to ensure the growth of both the USPS and the industry. I also believe that the December 16 postal bulletin allowing unaddressed flats for city routes entered at Destination Delivery Units and the Marketing Mail Made Easy (MMME) concept in Docket No. MT2011-3 will not achieve the goal of significant revenue for the USPS and could cause significant damage to the mailing industry.

Comments on United State Postal Service Simplified Mail Program (SPP) and Marketing Mail Made Easy (MMME).

In March 2009 MTAC Workgroup 129, Eliminating Obstacles to Mail Growth, was formed. The group submitted its final recommendations in March 2010. One recommendation that was submitted was to relax the restrictions for simplified addressing for city routes. This recommendation was highly controversial as not all in the group felt this was a good idea. Service providers who maintain and sell resident lists saw this as affront to the livelihoods and others saw the opening of the mail box to more unaddressed mail as a 'cheapening' of the USPS brand. Others felt that this would add more fuel to groups advocating do not mail legislation.

Calmark does not maintain or sell residential files. My concern for simplified addressing and MMME is on a variety of fronts. First while not having to buy an address may save initial costs the mail owner must still determine which carrier routes they want to mail. The USPS does have a website that will provide you with route numbers and quantities for a particular city and state. However without mapping capabilities knowing that a particular route has a certain number of deliveries is of little help to the mail owner without knowing what streets the route covers. Missing this bit of information requires the mail owner to seek the same professional help (service provider) that the program is designed to allow the owner to avoid. In many cases the cost of mapping is included in the cost of the residential list. Additionally the mail must be placed in bundles and a facing slip affixed to each bundle. The mail pieces must be counted to create the correct bundles. Counting can be done by weight, by hand or by machine. So is the mail owner any better off and has the process really been simplified? I don't believe it has.

At <http://www.usps.com/promotions/simplifiedaddressing.htm> the USPS provides an explanation of the program and a step by step 8 page user guide. In step 3 the USPS explains how to select the routes and the minimum number needed to mail. Interestingly that the next bullet point states *"Mailing should exclude people that don't wish to receive your mailings."* How can one exclude particular addresses from delivery when there is no address on any of the mail pieces? I have been told that the procedure will require the person that doesn't want the mailing to contact the mail owner. The mail owner must then maintain this list and provide it to the USSP when submitting the mailing. This is problematic in many ways. First it requires an individual to first receive a mailing from a particular company to decide they do not want future mailings. Then the recipient must contact the mail owner and register the request. As stated earlier the mail owner must maintain a list of those not wishing to receive their mailings. Once compiled the list must be delivered to the USPS with the mailing. The delivery carrier now has the responsibility to use this list when list when delivering this mail. I question how many lists will the USPS be maintaining at any one time? Presently there are systems in place that allow consumers to be removed from multiple lists without contacting each mail owner. The Simplified Mail program is anything but simple for the consumer, the mail owner or the USPS. What it does do is provide additional fuel for legislation for do not mail registries which would have a far more negative impact on the industry than any revenue that might be raised by this new program. Both New York (SB1958 and SB2063) and Indiana (SB14) have recently introduced legislation against unsolicited mailings. I feel introduction of non addressed mail for city routes will encourage more such legislation.

The changes created by MMME simply the mailing process only by eliminating the need for the mail owner to purchase a permit number. However many service providers have eliminated this need for their customer by allowing mail owners to use the service provider's permit thus avoiding the present \$370 cost. In addition MMME is limited to 5,000 per delivery unit. Other than these changes the rest of the simplified address rules apply. These rules require the mail to be bundled by carrier route in predetermined bundle sizes, and delivery of the mail to the delivery unit. The mail owner must also submit documentation of the number of active deliveries per the USPS Delivery Statistic File. Finally while a permit is not required if the mail owner does not have one they will be required to 'register' with the postal service so their mailing data can be tracked. So while there is no fee there is a form to be completed. This process is truly no simpler for a local merchant whose business is other than direct mail. In the end the merchant would be better off contacting a mail service provider and let them handle the details.

In summary I believe that the simplified addressing of city route mail may be damaging to the USPS brand and the direct mail industry. Not being able to adequately eliminated unwanted mail from the mail stream will only feed the do not mail registry advocates. The MMME program doesn't really provide the mail owner with an easier way of mailing. The MMME program simply eliminates permits and the associated fees. All other simplified addressing requirements must be met. Meeting those requirements is far easier when done by a mail service provider than by a local merchant not involved in the mailing process. If the USPS believes the permit fees are a major barrier to people mailing then perhaps they should just eliminate the fees.

Thank you for the opportunity to comment on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Colella". The signature is fluid and cursive, with the first name being more prominent.

Stephen Colella
Vice President Postal Affairs
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