
Market Test of Experimental Product –
Mail Marketing Made Easy

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: Docket No. MT2011-3
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**REPLY COMMENTS OF THE SATURATION MAILERS COALITION
AND VALASSIS DIRECT MAIL, INC.**

(February 15, 2011)

Pursuant to Commission Order No. 649, the Saturation Mailers Coalition (SMC) and Valassis Direct Mail, Inc. (Valassis) hereby submit their reply comments on the Postal Service's proposal to conduct a market test of an experimental product it terms "Mail Marketing Made Easy" ("MMME").

A number of the parties who submitted initial comments have criticized both (1) the Postal Service's determination in December 2010 to extend the simplified addressing option long used on rural routes to city delivery carrier routes; and (2) the Postal Service's proposal in this docket to conduct a market test of its MMME concept that, among other things, would employ simplified addressing. These are separate issues, and only the latter MMME concept is properly before the Commission here. Simplified-addressed mail has been allowed on rural carrier delivery routes for more than fifty years. The Postal Service's decision in December to extend that addressing option to city carrier delivery routes is an operational determination entirely within its jurisdiction, and is not a legitimate issue before the Commission.

Several commenters have claimed that the Postal Service's decision to extend simplified addressing to city delivery routes came as a surprise and without notice. In

truth, this issue has been a topic of discussion within the mailing community for much of the last decade. The SMC and Valassis have long urged that the Postal Service allow simplified addressing on city routes as an option for saturation mailers who could not readily undertake on-piece addressing, and as a means of encouraging saturation volume growth.¹ Those discussions within the mailing community and with the Postal Service by both industry representatives and interested parties – including parties that opposed simplified addressing – have been ongoing for years. The fact that the Postal Service was actively and seriously considering extending simplified addressing was certainly no secret.

As to the merits of MMME, some of SMC's members have concerns about its potential impact. However, we also understand that the Postal Service needs to be exploring ways to generate new volumes and revenues. In light of the limitations of this market test, we are willing to reserve judgment until the results of the test are in.

In sum, the Commission's focus in this proceeding should be confined to the merits of allowing this MMME market test independent of the Postal Service's operational decision to expand the simplified addressing option to city delivery routes.

Respectfully submitted,

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¹ See, e.g., testimony of Pete Gorman on behalf of the SMC in Docket R2006-1, SMC-T-1 at 6-8, 14-15. In that proceeding, the SMC specifically acknowledged that simplified addressing was within the jurisdiction of the Postal Service, not the Postal Rate Commission. SMC-T-1 at 14; SMC-Advo Initial Brief at 12.

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