

**BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON DC 20268-0001**

Consideration of Technical Methods to Be)
Applied in Workshare Discount Design)

Docket No. RM2010-13

**COMMENTS OF
FLORIDA MAIL AND PRINT SOLUTIONS INC.
ON CONSIDERATION OF TECHNICAL METHODS TO BE APPLIED IN
WORKSHARE DISCOUNT DESIGN**

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The following comments are being submitted by Joel Thomas, Executive Director of the National Association of Presort Mailers, at the request of and on behalf of Michael Carlino, President of Florida Mail and Print Solutions, Inc., a member of the National Association of Presort Mailers.

Florida Mail and Print Solutions, Inc. is pleased to submit these comments in response to the Postal Regulatory Commission's Order 537 establishing this docket to consider analyses, arguments, and proposals concerning technical issues related to workshare discount design and to solicit comments as stated in the notice that appeared in the *Federal Register*, Vol. 75, No 185, on Friday, September 24, 2010 at pp. 58440-50.

I am the President of Florida Mail and Print Solutions, Inc. in Fort Myers, Florida. I have been working in the mailing presort business for the past seven years, first as a sales representative and then as the owner of Florida Mail and Print Solutions, Inc., which opened for business on April 21, 2008. Today we are one of the largest mail houses in Southwest Florida. Florida Mail and Print Solutions, Inc. automates around 45,000 pieces of

First Class metered mail. That volume that makes Florida Mail and Print Solutions a relatively small presort bureau.

The purpose of these comments is to examine the type of First Class mail we are preparing and the work we do in order to convert to Workshared Metered Mail. In my experience the First Class mail we pick up has the same characteristics as metered collection mail, and, if that is the case, then the proper discounts should reflect the full cost difference between workshared Mail and collection mail. It is my understanding that the process for determining the costs avoided by the USPS as a result of worksharing is missing some elements.

When we start a new client we spend time educating them on what kind of mail is acceptable and what kind of mail is not. This education is ongoing; we are constantly working with our clients on mail quality. Our average customer give us around 200 pieces a day. We pick up mail from businesses with volumes as low as 50 pieces a day. When we approach these businesses they have no knowledge that workshared discounts exist. They never paid attention to their mail quality, because they didn't know they needed to have any. The only reason why they pay attention to it now is because they receive a discount. If there was no discount there would be no reason to enforce the guidelines we have put in place.

Before we can barcode, presort and deliver mail it to the BMEU, there is considerable amount of processing we must do:

First the mail doesn't come to us we have to pick it up. We have six vehicles traveling around 18,000 miles a month.

Second we have to supply the client with the appropriate mail trays. I don't remember even one client that ever used a 1 or 2 foot tray, before we started supplying them.

Third we must make sure all the mail is organized and is facing the same direction. We have clients that have been receiving presorted discount for years and there are still times that we have to organize their mail properly.

All our drivers are educated on the proper dimensional standards for letter mail and bring any mail that they think may present a machinable issue to our sales rep for that client. Our mailers understand that in order to receive the discounts they have to follow certain standards. Every day we get mail that is stuck together, envelopes that have some print blocking the barcode clear zone, mail that is not sealed properly (i.e. using tape rather than tabs), and mail that wouldn't be able to run through the OCR unless some changes were made. All of these pieces are either sent back or fixed on site so they will run through the mail stream efficiently.

I guess the point I'm trying to make is there are many costs presort bureaus must incur in order to turn our clients mail into Workshared Metered Mail and those cost should be considered when evaluating the Workshared Discounts.

Respectfully submitted,

Michael Carlino

President

Florida Mail and Print Solutions, Inc.