

Office of the Secretary  
Postal Regular Commission  
Washington, DC 20268-0001

May 24, 2013

Docket Number: R2013-6 Technology Credit Promotion

Please accept this as the comments of Conde Nast as concerns the USPS Proposal for a Technology Credit.

We have worked with the USPS for over a year in their attempt to incent more mailers to convert to the use of Full Service IMB. While Conde Nast has been using Full Service IMB from the beginning we fully supported the Service's effort to expand its use. The Tech Credit was meant to reimburse those vendors that had already incurred the costs to convert to Full Service IMB as well as to assist those that had yet to convert.

At no time was there any discussion on the fact that the Service had any intention of raising postage rates in order to recover the cost of the Credits. When their filing for the Credit was made public we realized the tremendous rate impact which we would incur if the Commission approved their filing. After many conversations with various Postal officials we were told that the increase would only be for a single year and would only apply to origin entered mail.

None of these clarifications are in writing nor are referred to in the filing. There is no definition of what constitutes origin entered mail. We have asked for such clarification but did not receive this information.

We therefore have no option other than to ask that the Commission not to approve of the Tech Credit proposal as it will cause us to absorb a rate increase for both our Periodicals and Standard letters in excess of the Tech Credit we would receive. It was a noble gesture that turned into something that was never intended to be and therefore should be denied.

Howard Schwartz  
Conde Nast