

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Notice of Price Adjustment Technology  
Credit Promotion

Docket No. R2013-6

**DECLARATION OF BRADLEY HILL  
IN RESPONSE TO THE POSTAL SERVICE PROPOSAL FOR TECH CREDITS  
(May 24, 2013)**

My name is Bradley Hill. I am president of Interlink, Inc., a mailing software company that has served the newspaper mailing community since 1980. I am also NNA's representative on the Postal Service's Mailers Technical Advisory Committee and have served since January 2013. I assisted the Postal Service in adapting its new Mail.XML software for newspaper mailers' use. To assist the Commission in its analysis of the Postal Service's proposal, I am providing the following information as a supplement to the comments of the National Newspaper Association.

1. We represent 1,515 newspaper customers. A substantial number are members of the National Newspaper Association.
2. 0 % of these newspapers are presently using the Full-Service Intelligent Mail barcode.
3. 0.013 % have upgraded to our new Mail.XML-compatible software and are supplying their mailing statements electronically.
4. The cost of the software upgrade is not as prohibitive as the Postal Service seems to believe. Our company has offered the upgrades for only \$ 99. That price may rise somewhat, but it will not be the principal barrier to Full-Service adoption. We have heavily advertised the benefits of this upgrade and provided aggressive discounts for early adopters, but few have responded.
5. Our company has invested more than two hundred thousand dollars in programming this upgrade. The investment was deeper and longer than expected because of many defects in USPS Mail.XML system and the lack of

- accurate documentation. We had to wait for USPS to make many programming changes, and develop our own workarounds to make it work.
6. We are now offering a simple bridge program to our competitors to aid them in helping the newspaper industry convert to eDoc.
  7. As an expert in newspaper mailing software, I can see numerous advantages to the Postal Service in encouraging newspapers to use eDoc, even if the rest of the Full-Service scheme benefits are not yet of value to our industry. I do believe a financial incentive would accelerate the adoption.
  8. Most of our customers have no IT departments. They use me as their guide to using new technologies. The learning curve will be slower for small businesses than for those more able to absorb new technologies.
  9. I first suggested to the Postal Service in April 2013, that a lower tier tech credit should be available to encourage the newspaper mailers. The present threshold is set too high to capture most of them.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

  
Bradley Hill

President, Interlink, Inc.

May 24, 2013