

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

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Notice of Market-Dominant)
Price Adjustment) Docket No. R2015-4
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Comment of the Direct Marketing Association

March 31, 2015

The Direct Marketing Association (DMA) submits this brief comment concerning the price adjustments for Periodical mail, particularly the adjustment to the rates applicable to editorial content for both commercial and nonprofit periodicals.

As the Postal Service (USPS or Service) noted in its initial notice in this Docket: “[T]he Postal Service is cognizant of Periodicals’ value to the public (Factor 8, Factor 11).” Notice of Market-Dominant Price Adjustment, p. 27. The price adjustments noticed by USPS bely that statement, however. Those price adjustments impose significantly great increases upon light weight, high editorial content publications. It is precisely those publications which carry little, if any advertising, that require the greatest protection and consideration under Factors 8 and 11 of 39 USC section 3622(c).

Non advertising or low advertising content periodicals cannot cover increased postage costs through advertising. They have three options: increase subscription prices, reduce editorial content or cease publication. With those consequences DMA does not understand how USPS considered “the educational, cultural, scientific, and informational value to the recipient.” 39 USC section 3622(c)(11) It is the editorial matter in both for-profit and nonprofit periodicals that provide the educational, cultural, scientific, and informational value to the American public. USPS should not burden that content with above average postage increases which DMA contends violate 39 USC section 3622(c)(11). As this Docket progresses, DMA asks the Commission to require USPS to protect editorial content of Periodical mail as directed by statute and reduce the above average increased postage burden on editorial content.

Respectfully submitted,



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