

Jerry Cerasale
Senior Vice President,
Government Affairs

January 28, 2009

Ms. Sharon Daniel
Manager, Mailing Standards
U. S. Postal Service
475 L'Enfant Plaza SW Room 3436
Washington DC 20260-3436

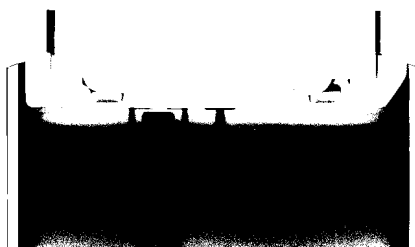
Re: Proposed Rule, New Standards for Letter-Size Booklets and Folded Self-Mailers,
Federal Register Vol. 73, No. 249, 74930-79435

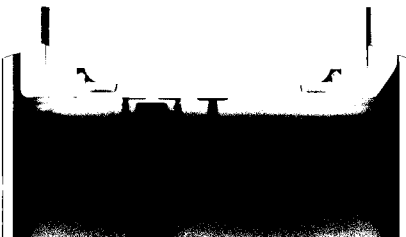
Dear Ms. Daniel,

The Direct Marketing Association reiterates the importance to its member companies of the comments filed jointly with Postcom, MSFA and ANM. It also writes to reinforce its concerns about the potential impact of proposal as it relates generally to Self-Mailers and several other specific provisions.

While we appreciate the Service's willingness to engage the mailing industry on matters associated with the processing of booklet-shaped mailpieces, we are mindful of the fact that the use of this format long pre-dates the suggestion associated with the R2006-1 shift to shape-based rates that this format would be an acceptable substitute in mitigating rate increases for flat-shapes mail. It was only after mailers responded to that suggestion that the Service made known that problems existed in the processing this mail on automated letter sorting equipment. We are unaware of any similar problems in processing self-mailers, which in and of itself begs the question as to why this particular format was even considered for inclusion in the abovementioned proposed rule.

Those of our members who use the self-mailer format are mystified by the proposed changes for this type of mailpiece. They report few, if any problems, over the years in the acceptance, processing and delivery of their products—products that include more than one page, discount cards glued within or small samples attached. They also express dismay that there appears to have been no request for production run samples of this type mailpiece and, to the best of their knowledge, testing of such mailpieces. The requirements, we are advised, are so onerous that they are likely to produce result akin to the self-inflicted wounds to mail volume emanating from the rate increases imposed on Standard flat mail. These regulations not only will eliminate entire business lines for some of our members, but also drive some members out of business. The collateral damage to an industry already reeling from the effects of the economic downturn borders on the unthinkable.





Likewise, we are concerned that testing of tabs for booklet-shaped mail may not have exhausted the range of possibilities—for example, reverse ratio perforated tabs that might meet both the Service's operation needs and those of mailers in presenting a well-received and attractive to the consumer. Of equal concern is the proposal to limit the size of certain booklet-shapes pieces; again without an evidence to support diminishing the value of this type piece as a product.

We urge the Service to give these concerns full consideration along with the many others addressed in the joint comments. We request, in the very least, that the Service delay the effect date of all proposed changes at least one year in order to provide the industry to understand and work with the Service on crafted requirements that will benefit both the Service and the mailing industry

Sincerely,