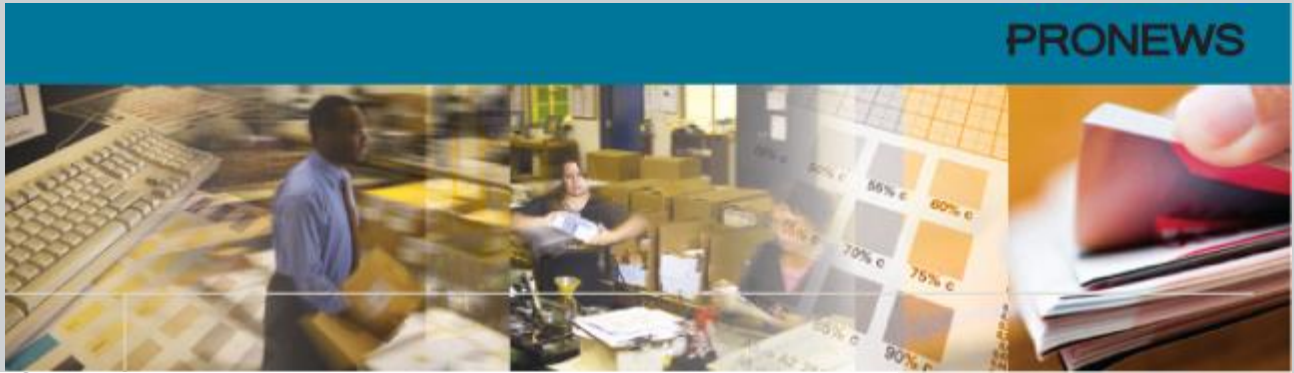


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September 2018 -
SPECIAL ISSUE

New Proposed Content Rules

Please don't ever make us take the word "proposed out of this headline!

ProList, Inc. is an Industry Innovator in data management and direct mail services solutions.



In our [August ProNews](#) (if you didn't read it, please do), we alerted you to a new rule proposed by USPS to restrict letter and flat mail to paper products only. The rule:

This proposed change would limit all USPS Marketing Mail, regular and nonprofit, letter-size and flat-size, to content that is only paper-based/printed matter; no merchandise or goods will be allowed of any type regardless of "value." All items not eligible to be sent as USPS Marketing Mail letter-size or flat-size pieces would need to shift to another product (e.g., Priority Mail®, Parcel Select®) to be mailed.

We NEED you to comment on this disastrous rule. It's really easy:

Mail or deliver written comments to the Manager, Product Classification, U.S. Postal Service, 475 L'Enfant Plaza SW, Room 4446, Washington, DC 20260-5015. Comments and questions can also be emailed to ProductClassification@usps.gov using the subject line "USPS Marketing Mail Content Eligibility."

Quality Service Guaranteed!



You have until October 22. Our comments to the USPS are below – feel free to borrow from them, copy them, or write your own. Just make sure you get your comment in. Postage payers get a lot more attention than mail service providers (that's us).

ProList Comments to USPS:

Sir/Madam,

I am writing regarding the proposed rule change related to the change to content standards for USPS Marketing Mail.

Contact Us Today!

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ProList, Inc. prepares more than 60,000,000 pieces of mail per year for more than 200 organizations across the United States. The majority of the mail we process is USPS Marketing Mail. A significant portion of that mail is fundraising for nonprofit organizations, renewal notices, and advocacy mailings. These organizations count on the US Postal Service to deliver their mail at a fair price. Included in many of these mailings are non-paper items: plastic membership cards, gift cards, window decals, bookmarks with tassels on them, plastic bumper stickers, and coins affixed to cards, among other items. We and our clients go to great lengths to be certain that these items meet automation requirements, in terms of flexibility and uneven thickness. To reclassify any of these items as a parcel would simply be devastating to the efforts of our clients. This appears to be a misguided attempt to boost package volume by forcing letters and flats into that much more expensive category. It is much more likely to simply drive those pieces out of the mail.

To convert such items to packages would be financially unviable to our clients. The preparation requirement for IMpb mail is untenable at scale. The dramatic increase in postage going from a letter or a flat to a package would bankrupt many of our customers. They count on using premiums as an inducement for donations. Sending membership cards is essential. They simply could not afford to do so as parcels. They would cease many of their mailings and look for alternative distribution channels. The Postal Service has failed to demonstrate that non-paper items create any undue difficulties in processing. In fact, letters as a mail classification generally are shown to cover their costs. Some flats may be “under water” in some cases, but that is not a result of non-paper items within them.

The Postal Service has been touting through its Irresistible Mail program to use imaginative designs and substrates to keep mail viable. This rule seems to be in direct contradiction.

Regarding the three “goals” in the proposed rule posting:

1. Facilitate levels of service expected for the processing and delivery of merchandise that include end-to-end tracking and visibility.

Nonsense. There is no enhanced service to package shipping, and a membership card is not “merchandise.” Informed Visibility provides end-to-end tracking and visibility. There is no customer demand for any such “enhanced” service.

2. Move fulfillment of merchandise and goods out of USPS Marketing Mail, consistent with the transfer of fulfillment parcels out of Standard Mail.

An item not being printed on paper does not make it merchandise. There are already content restrictions for letters and flats. Characteristics of content may drive mail class – an invoice must

be First-Class for example, but should not change the mail category. Changing USPS Marketing Parcels to a different class of parcels is one thing – changing a letter to a parcel because it has a plastic sticker enclosed is absurd.

3. Reduce operational inefficiencies when machines are unable to process letter-size or flat-size shaped inflexible items.

If there are operational issues with letters and flats, modify or tighten rules as to flexibility and irregular thickness. Mailers want their mail to process efficiently – if the current mix doesn't work, tell us what you need. These content restrictions are simply arbitrary.

The damage that this rule would do to the direct mail industry is difficult to overstate. It would reduce the volume of mail, and the relevance of mail. Many of our customers would simply find other channels for marketing and communication with their customers.

Thank you.

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