



April 14, 2008

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

Dear Sharon:

The American Catalog Mailers Association (ACMA) respectfully submits comments on behalf of its members in response to the Notice of Proposed Rulemaking on Letter-sized Booklets and Folded Self-mailers ("slim jims"), as published in the Federal Register on March 14, 2008 (Vol. 73, No. 51, Ref: 39 CFR Part 111).

Catalogers view the shape of their mailpiece as an essential ingredient driving their brand awareness and are deliberate in making changes to their brand attributes. Size and shape of the mailpiece are essential drivers of brand awareness. Most ACMA members have not adopted "slim jim" formats due to (i) the significant cost to redesign catalogs to accommodate this, (ii) uncertainties on the impact on response rates, and (iii) reports that the slim jim format does not run well currently and that new standards will be required. Some members have migrated a portion of their mail plan to the slim jim format and are experimenting with its impact. Our comments are necessarily general given the nature of the advance notice and the catalog industry's short history with this format.

Many catalogers view the slim jim as a less desirable alternative to traditional flat mailpieces because it is the front and back cover that generate interest in the mailpiece on receipt, causing the recipient to delve inside. The reduced cover space and the real or perceived difficulty in opening the piece compared to a traditional catalog are believed by many catalogers to negatively impact both open rate and response rate. While some ACMA members have moved a small number of their output to slim jims, more have been working on finding other lower cost alternatives to the traditional catalog for prospecting and house list order generation. Some of these solutions include other mailed items such as large format postcards. Many others involve non-mail substitutes. The range of approaches is varied. The results of these activities are still generally not understood fully in the catalog industry. Thus, it is difficult to gauge this industry's interest in slim jim type formats in the future.

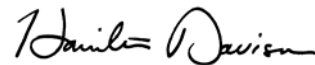
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Those catalogers we consulted with had significant concerns about reducing the thickness of slim jims as it would reduce the number of pages and thus increase the cost per page mailed. "Advertising cost per item" is driven by the number of items on a page and the number of pages in the mailpiece. When considered with the price, gross profit and amount of that item ultimately ordered, the cost per item and thus the cost per page are sensitive inputs to cataloger decision making. Generally, anything that increases the cost of presenting an item to a customer or prospect is a negative. The economic impact of reducing booklet thickness to 1/16<sup>th</sup> of an inch is expected to make this format less attractive and may eliminate it altogether as an option for some catalogers.

Increasing the tabbing and strength of tabs (and presumably, the difficulty for the recipient to open the slim jim on arrival) is considered to be negative as anything that decreases the open rate impacts the number of orders generated (response rate) from the mailpiece.

Further testing and study are needed to understand the interplay of all these factors. All other things being equal, catalogers would like to preserve the slim jim as an alternative mailing vehicle if a way to address flat postage cost cannot be found. We are happy to address any questions raised by these comments or to work to provide further feedback based on specific plans or proposals under consideration. We appreciate the opportunity to provide input and welcome working with the Postal Service to resolve issues impacting catalog mailers.

Sincerely,  
AMERICAN CATALOG MAILERS ASSOCIATION



C. Hamilton Davison  
Executive Director