

Via Email:

December 10, 2007

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

Dear Mailing Standards Manager:

I write on behalf of the American Catalog Mailers Association (ACMA) to express concerns over proposed address and barcode requirements published in the Federal Register, Vol. 72, No. 195 (October 10, 2007). ACMA represents both B2B and B2C catalogers around the United States that send billions of flat-sized mail pieces through the U.S. Postal Service each year. Mail is an essential component of catalogers' marketing strategies and business plans.

The Postal Service should not finalize address placement requirements without fully understanding the effect on the catalog industry of the proposed changes. In particular, the proposed rule would require catalogers to change the location of the address on the back and front covers. Catalogers carefully calibrate each inch of a mail piece and test changes over time to maximize the catalog's effectiveness. Once they arrive at a successful formula, they modify it only after extensive testing. The front and back covers represent prime real estate, and the top portions of the covers are some of the most carefully designed parts of all. A slight change to either of the covers can have a disastrous effect on response rates. Decreased response rates will ultimately drive catalog volumes down--hurting not only our industry, but the Postal Service itself.

No cataloger would willingly make abrupt changes to the layout of its covers without first testing the change. We ask that the Postal Service work with us to do that before finalizing requirements that could result in concrete financial losses to the industry.

Like the Postal Service, ACMA members would like to increase efficiency and decrease the delivery costs of flat-sized mail, but those changes must be carefully considered and implemented on a cooperative basis. If not, they threaten to cause serious and long-term harm to our industry, and, ultimately, to catalog volumes--an important part of the Postal Service's current business and potential

for future growth. This year's postage increases of between 20-40%, coupled with double-digit increases in the price of paper, have left catalogers reeling, and an additional mandate that would cut into our prime selling space and threaten our response rates would be a hard blow to take.

We would welcome the opportunity to sit down with the Postal Service and see whether we can find a solution and/or develop an effective way to test this proposed address placement change. We believe that--working together--we can.

Thank you for your time and attention to this important matter.

Respectfully yours,
/s/ Hamilton Davison
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