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Lexington, VA

**July 8, 2024**

**TO: United States Postal Service**

## **COMMENTS BY THE NATIONAL NEWSPAPER ASSOCIATION**

Pursuant to the proposed changes to rules regarding Securing Bundles of Flats (89 FR 50542) the National Newspaper Association (“NNA”) submits the following comments.

NNA represents over 1600 newspapers, most of which use the US Postal Service for some or all of their delivery to subscribers. The average NNA member newspaper has a circulation of around 3000, delivered once a week, but we also have members who circulate more frequently. NNA member newspapers serve as the primary source of local news and information in many of the communities they serve.

### 1. How NNA member newspapers utilize the US Postal Service

The typical NNA member newspaper prepares bundles of newspapers presorted to the carrier route, and often in walk-sequence, and delivers those bundles to their DDU entry post office. Newspapers going to subscribers beyond the DDU, primarily to out-of-county addresses, are typically placed in flats tubs, either bundled or loose depending on the instructions from their SCF or RPDC. Many NNA members also deliver under the Exceptional Dispatch rules carrier-route sorted walk sequence bundles to offices within their local area to expedite service.

### 2. How the Proposed Rule would affect NNA member newspapers

Although NNA does not have data on the number of members currently able to comply with the Proposed Rule, anecdotal information indicates that few member newspapers own or can access equipment that would apply bands to the bundles being prepared for mailing. Some members have equipment that will bind bundles with twine or high tensile strength string. Acquiring the equipment needed to apply the plastic bands would place a substantial financial burden on small newspapers at a time when they are already under financial stress. Hand-operated binding equipment is cheaper, but applying bands with these is more time-consuming, and the security of the binding performed by this hand equipment is not known.

We believe the genesis of this proposal is to address persistent problems with bundle breakage in mail processing. The concern is a legitimate one. But its application to newspapers is more tenuous than to other types of publications that might be shrink-wrapped, prepared on pallets or otherwise more susceptible to breakage. In our experience, the newspaper preparations do not add to the breakage problems materially. Crafting a rule



that adds to the burden of these mailers requires differentiation that could be better addressed in the proposal.

### 3. Proposed modification to the Proposed Rule

NNA proposes that where a newspaper has been directed to enter loose bundles in flats trays, the rule clearly does not require them to return to bundle preparation. Our proposal addresses those bundles that are bound and may be covered by the new rule. We suggest that the Proposed Rule be modified to allow applicable flats that are carrier route sorted and entered at the entry office DDU, at authorized Exceptional Dispatch offices, and at S&DCs for local delivery to be bundled using two cross-strapped bands (as proposed in the rule change) or cross-strapped heavy cord or twine of at least 100 lbs. working load secured with double square knots or similar secure means. Because these bundles are not transported by USPS, nor are they worked on automated equipment such as bundle sorters and conveyors, they are not subjected to the stresses that would appear to make bundle breakage more of an issue. NNA does not object to the elimination of rubber bands.

### 4. Mailings prepared loose in flats trays

NNA has no objection to the proposed exemption for mailings of flats pieces be allowed to be prepared loose in flats trays. We are aware that some members have been told by their SCF or plant that they prefer this preparation We believe that the 500-piece maximum is too low and ask that this be amended to a maximum of 1000 pieces per mailing.

### 5. Conclusion

NNA members are committed to working with USPS to facilitate efficient handling of bundles of newspapers both locally and within the larger delivery system. We believe that requiring the use of plastic bands is not necessary for bundles not being transported or subject to sorting and conveyor equipment, and that proper use of appropriate cordage or twine to secure bundles will be sufficient for both the mailer and USPS for local mail entry.

A handwritten signature in black ink that reads "Matthew W. Paxton". The signature is written in a cursive style.

Sincerely,  
Matt Paxton  
*The News-Gazette, Lexington, VA*