Pitney Bowes

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DEFLECTION STANDARDS for COMMERCIAL FLATS

BACKGROUND INFORMATION:

Commercial flats are flat-size mailpieces mailed at _discounted_ prices, including presorted and automation First-Class Mail®, presorted, automation and carrier route Standard Mail®, presorted and carrier route Bound Printed Matter (BPM).

Several requirements and regulations must be met in order for businesses and organizations to mail at commercial prices. One is that of meeting the minimum volume requirement for that class or subclass of mail, such as 500 or more pieces for commercial First-Class Mail® mailings, or 200-plus pieces, or a mailing weighing at least 50 pounds, for Standard Mail®, or at least 300 pieces for BPM. Another is the Move Update regulation which applies to commercial First-Class Mail® and Standard Mail®.

In addition to other criteria that must be met in order to mail at commercial prices, specific to flat-size pieces, mailers must ensure that the flats are rectangular in shape, flexible, uniform in thickness and meet deflection criteria. On June 7th of this year, revised deflection standards took effect, and as of October 3, 2010, mailers that do not meet deflection criteria, e.g., "non-compliant flats" are subject to an assessment. This assessment means additional postage which could be in some cases, a huge hit to a mailer's budget!

There are some exceptions to the deflection standard; these include ECRWSH (Enhanced Carrier Route Walk Sequence High-Density) and ECRWSS (Enhanced Carrier Route Walk Sequence Saturation) flats, or flat-size mailings prepared at basic carrier route prices (ECRLOT, Enhanced Carrier Route Line of Travel) if drop-shipped to DDUs (Destination Delivery Units).

REVISED REGULATIONS:
While commercial flat-size mailpieces must be flexible, they must not be so flexible that they are flimsy, or droopy. To that end, some mailers call the compliance test for deflection the "droop test".

The revisions to the regulation identify which commercial flats are now subject to the criteria, and also the allowable deflection tolerance.

In short, the process of measuring deflection includes extending half the length of a flat-size mailpiece off the edge of a straight-edge surface, such as a counter or table, using a ruler and a 5-pound weight on the mailpiece to sufficiently support and stabilize the piece, measuring the vertical drop and then rotating the piece and repeating the process. Generally, the maximum drop is 2 inches less than the extended length.

For example, to test a 10-inch mailpiece, extend the piece 5″ off the counter; position the ruler and the weight. The vertical drop cannot extend more than 3 inches.

Refer to the testing requirements located in section 301 (Commercial Flats) of the Domestic Mail Manual (DMM®): http://pe.usps.gov/cpim/ftp/manuals/dmm300/301.pdf.

ASSESSMENT for NON-COMPLIANCE:
A mailer that fails the deflection criteria for a first time is instructed by the business mail entry unit (BMEU) staff that their flat-size mailpieces do not meet the deflection criteria; however the mailing will be accepted at the postage price presented. Subsequent flat-size mailings that are subject to deflection criteria must meet the standard or the mailer will be subject to the assessment, which in many cases means moving from a low automation price to a higher nonautomation price.

Examples of assessments:
- First-Class Mail® (FCM) flats presented at automation prices pay the FCM presorted price.
  - 1-ounce FCM flat 5-digit price of $0.380 would pay the nonautomation/presorted price of $0.757.
- First-Class Mail® flats presented at presorted prices pay the FCM single-piece (retail) flat or presorted parcel price.
  - 1-ounce FCM flat presorted price of $0.757 would pay the retail price of $0.88.
- Standard Mail® flats presented at automation prices pay the nonautomation price at the same sortation level.
  - 1-ounce Standard Mail® flat 3-digit price of $0.418 would pay the 3-digit nonautomation price of $0.464.

For additional information relative to pricing for flats exceeding maximum deflection, see section 301 (Commercial Flats) of the Domestic Mail Manual: http://pe.usps.gov/cpim/ftp/manuals/dmm300/301.pdf.

STRATEGIES:
To avoid unpleasant surprises at the BMEU, it is suggested that mailers first identify those flat-size mailings that are subject to deflection criteria. Of those, mailers should test their mailpieces per the steps outlined in the DMM® and also reach out to the Mail Design Analyst if additional clarification is needed.
For flat-size mailpieces that fail the deflection standard, mailers may want to consider redesigning the mailpiece, perhaps by simply adding an additional page or using heavier stock. In doing so, the mailpiece may meet deflection criteria and thus the lower postage pricing the mailer intended. Another option in redesigning the mailpiece would be to fold the piece to meet letter-size criteria. This can be accomplished efficiently and cost-effectively using Pitney Bowes inserters. Redesigning a light-weight flat to letter-size can substantially reduce postage spend!

In conclusion of this "Customer Connections" article, please keep the following in mind. Educate yourself on how changes to regulations may impact your business or organization. Partner with Pitney Bowes consultants to learn about and implement solutions to manage and/or meet these changes while improving processes within your document creation, mailing and shipping environments.

Please watch for additional information, strategies and tools from Pitney Bowes!

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