

Nonprofits Get Standard Mail Rule They Can Live With

A full-court press by nonprofit mailing groups to explain the impact on their direct mail fundraising techniques of the new Standard Mail eligibility rule finally got the attention of USPS officials who last week issued a Customer Support Ruling (CSR) that mailers say addresses their biggest concerns about their ability to continue business as usual.

Since USPS issued its final rule to define what qualifies as Standard Mail, nonprofit mailers had been growing increasingly concerned about various CSRs that were issued to explain what would be considered allowable for the Standard Mail rate. They were worried that the Postal Service didn't understand how technology has enabled them to prepare more sophisticated mailpieces in order to generate the best giving response by donors.

And nonprofit mailers were particularly concerned that the CSRs that were being issued still left too much room for interpretation by local postal officials and could lead to arbitrary and inconsistent results.

The new CSR-323 – entitled Computer-Prepared Mailpieces Entered by Nonprofit Organizations – is a blueprint of what is acceptable for nonprofit mailings at the lower Standard Mail rate. The ruling goes into effect June 1, so mailers will still need to make some adjustments to mailings in time for that deadline, however.

Examples of Donation Solicitations

Customer Support Ruling 323 gives a dozen examples of the kinds of requests in mailpieces that will satisfy the Postal Service that the mailing is a solicitation for donations, thereby qualifying at the Standard Mail rates. Below is a sampling of some of those examples that go beyond a simple request for new or additional donations of funds:

- A request that the addressee join the mailer's membership organization or renew membership.
- A request that the addressee complete and mail an opinion survey, feedback or evaluation form, petition, open letter or note or card.
- A request that the addressee contribute other services in kind to the organization, such as a donation of time.
- A request or suggestion that the addressee read literature in the mailpiece or take any other action that relates to the nonprofit purpose of that mailer.
- A request that the addressee attend a seminar or event sponsored by the mailer that relates to the nonprofit purpose of that mailer.
- An invitation in the mailpiece that the addressee buy or lease goods or services from the mailer, or make a donation to the mailer, by visiting a website noted in the mailpiece.

"Nonprofit mailers have become very creative in their solicitation mailings, and we want them to be as confident as possible in their understanding of our mailing standards," USPS Chief Marketing Officer Anita Bizzotto said in a statement. Bizzotto noted that four mailing groups helped in drafting the comprehensive CSR: the Free Speech Coalition, the Assn. of Direct Response Fundraising Counsel, the DMA Nonprofit Federation and the Alliance of Nonprofit Mailers.

CSR-323 does not change the focus of the Standard Mail eligibility rule: the requirement that the mailing be an advertisement or a solicitation for a donation and that in cases where there is personal information in the mailpiece, that personal information must be directly related to the advertising or solicitation.

Rather, the change in the CSR that is most useful to nonprofits' direct mail efforts is the definition of "solicitation for donation." This now encompasses monetary and nonmonetary support for a nonprofit purpose for the mailer – a critical point because so many nonprofit mailings go beyond simply asking donors to write a check (see box).

The CSR explains that the solicitation does not have to expressly say: "please contribute," "please purchase" or the like. Rather, the content must indicate the requested action. A reply envelope with the endorsement "additional gift" would be considered a solicitation, for example.

USPS also said the mailpiece may have more than one solicitation. It may, for example, include a request for a financial donation and request that the addressee sign and return a petition to a government official. In these cases, the personal information in the mailing need only relate to one of the solicitations.

Phrases like "tax receipt" and "keep this for your records" continue to suggest a dual purpose for the mailing, and therefore a mailpiece with that language would be ineligible for Standard Mail rates. But phrases like "Your contribution may be tax-deductible" and "No goods or services were provided in exchange for this gift" do not cause the mailing to be ineligible.

The entire CSR can be viewed by going to www.ribbs.usps.gov and clicking on the Domestic Mail Manual link running down the left-hand column.

Or if you would like us to send it to you, or provide you with any of the other customer support rulings that have been issued to explain how the rule will be applied, call our editorial office at 301-229-1197 or contact us by email at lshearl@aol.com.