Thank you for the opportunity to provide comments on the United States Postal Service (USPS) Notice of Market-Dominant Price Change. Election officials nationwide work closely with federal and state USPS partners to mail educational materials, candidate guides, ballots, and more and have a great interest in the proposed changes.

The National Association of State Election Directors (NASED) is a nonpartisan, non-profit membership association representing all 50 states, the District of Columbia, and the five U.S. territories: American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the U.S. Virgin Islands. In 16 states and territories, NASED’s member serves as the Chief Election Official; in 40 states, NASED’s member reports to the Chief Election Official.

In March 2021, USPS issued its 10 year plan, Delivering for America, which led election officials to anticipate more regular price increases to all USPS services, including both First Class and Marketing mail. It is unclear whether these increases should be expected annually or more or less frequently, or how large they may be.¹ The May 28, 2021 USPS submission to the Postal Regulatory Commission, the Notice of Market-Dominant Price Change, clearly lays out the proposed 2021 price increases, which are scheduled to go into effect August 29, 2021, at 12:01am Central Time. We are concerned, however, that the submission leaves open the opportunity for another price increase of unknown size in January 2022: “...the Governors have determined to shift from the Postal Service’s previous January implementation schedule for annual price increases to an August timeline for 2021. The Governors have not yet determined whether this timeline shift will apply to future years.”² An additional price increase in January 2022 will fall in the middle of the fiscal year for most of the nation’s election jurisdictions and will coincide with the start of primaries for the November 2022 General Election.³ Additionally, states may be required to send notices of new precincts and districts resulting from the 2020 Census. Thus, election officials will have educational materials, completed voter registration forms, and live ballots in the mail stream as of January 30, 2022.

¹ See page 17 of Delivering for America.
² See page 5 of the USPS Notice of Market-Dominant Price Change submission to the Postal Regulatory Commission.
³ 2022 election dates are still subject to change. Currently the Texas statewide primary is scheduled for March 1, 2022; domestic absentee ballots can be mailed as early as January 15 and, per Texas Election Code 86.004(a), all ballots for those who have already requested them must be mailed to voters by January 30. The North Carolina primary is currently scheduled for March 8, 2022; domestic absentee ballots can be mailed as early as January 17.
Election officials currently lack necessary clarity surrounding a future price increase, both from a timing and scale perspective. This hinders our ability to appropriately and accurately budget for the 2022 election cycle and may result in reallocation of funds from other services, where legally permitted. This could require cuts and difficult decisions for election officials in many jurisdictions that are still recovering financially from running a presidential election during the height of the COVID-19 pandemic.

A potential price increase of unknown size approximately six months after the 2021 increase introduces significant financial uncertainty for state and local election offices. In addition to midterm election year activity, 2022 is also the first year after redistricting of congressional and state legislative districts from the decennial Census, which means that election offices must conduct additional voter education as a result of new district and precinct lines. Educational outreach to voters about their new state legislative or congressional districts and voting precincts is critical to ensuring they can participate in the 2022 elections.

We recognize that the timing of any price increase is a decision made by the USPS Board of Governors, but the size of a price increase is approved by the Postal Regulatory Commission. State and local fiscal years typically follow a July 1 to June 30 cadence. Without knowledge of the frequency or scale of price increases, election officials cannot budget appropriately for 2022 or any subsequent year. Given these concerns, we request that USPS and the Board of Governors, in conjunction with the Postal Regulatory Commission, proactively communicate the timing and size of coming price changes to election officials so that any increases can be accounted for in upcoming budgets. Further, we strongly encourage USPS, the Board of Governors, and the Postal Regulatory Commission to delay any 2022 price increase until after the November 8, 2022 General Election.

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