



March 30, 2007

Nancy Morris, Secretary
Securities and Exchange Commission
100F Street N.E.
Washington, D.C. 20549-1090

Ladies and Gentlemen,

We appreciate the opportunity to offer comments regarding the SEC's proposed Universal Internet Availability of Proxy Materials Rule, File Number S7-03-07. MailExpress is a leading provider of distribution services for expedited mailed documents such as proxies and annual reports. We are supportive of the commission's efforts in this area and have the following questions and recommendation that we believe will facilitate a smoother implementation of the new rules.

- 1) What records must the issuer (or the issuer's service provider) keep to validate that the 3 day requirement was met for the fulfillment of hard copy proxy materials requested by shareholders? Regardless how the records must be kept, we recommend the date that the request was made be printed so that it shows through the window of the fulfillment envelope or on the outside of the envelope so it can be easily compared to the date on the postmark or indicia to determine if the 3 day turnaround requirement was met.
- 2) Because the industry will initially rely on preprinted documents to fulfill requests for hardcopy proxy materials, it is likely that stock-outs will occur. In a stock-out situation, it is possible that the 3 day turnaround requirement will be missed. If the 3 day requirement is missed, how should the late package be sent? We suggest that materials missing the turnaround requirement by one day should be delivered via a 2 day express service and materials missing the requirement by more than one day should be sent via overnight service.
- 3) Does the day the request is taken count against the 3 day requirement? For example: if a request is received on Monday and Monday counts against the requirement, then the fulfillment package must go out by Wednesday. If the day the request is received does not count against the 3 day requirement, then the fulfillment package can go out by Thursday. The mailing industry traditionally views the requested day as the start of the service standard and so for the case of a Monday request, Tuesday would be the first day for fulfillment of that request and Thursday would be the last day for fulfillment of that request. We recommend that the day the request is taken not count against the 3 day requirement so it is consistent with industry standards.
- 4) We suggest that regardless of the answer to #3 above, the cutoff time be midnight in determining conformance to the 3 day requirement. For example, if a request came in on Monday at 11:00 PM, and the day the request is received does not count against the requirement, then the fulfillment package must be mailed by Thursday. If the request was to come in 2 hours later at 1:00 AM Tuesday morning then the last day the materials could be sent out would be Friday.



We would like to meet with you to discuss the above recommendations and will call to schedule a time that is convenient for the Commission staff. Thank you for the opportunity to comment on the proposed regulations.

Sincerely,

Robert T Moss
Chairman and CEO
MailExpress