



United States Postal Service Periodicals Eligibility Review PS Form 3548 Review and Verification of Circulation Guidance

More Publishers are turning to BPA Worldwide for their Periodicals Rate Postal Audit. Here's why:

Savings on distribution expenses:

A publication that qualifies for Periodical Rates enjoys considerable savings on its USPS mailing expenses compared to Standard A Rates.

Qualifying for Periodicals Rates:

A publication qualifies for Periodical Rates if it can prove that 50% of its distribution is either paid for or requested.

BPA is USPS authorized:

BPA Worldwide is authorized by the USPS to conduct the initial audit and periodic audits for the purpose of qualifying publications for Periodical Rates. BPA can conduct these postal audits for business and consumer publishers. Publisher need not be a BPA member to contract for this service.

BPA's audit advantage:

BPA staff, as part of their normal media audit procedures, verifies printed, telemarketing, and electronic sources of paid and non-paid subscriptions. The use of our unique confirmation process replaces the need for written signatures on telemarketing and electronic sources. BPA's expertise in auditing these telemarketing and electronic sources generally provides for a quicker turnaround time than the USPS method of sending mailed verification surveys to an audit sample, and requiring a minimum response rate.

Which Publications Require Review?

The following Periodicals publications require an eligibility review:

- a. Publications (except foreign) for which new applications for Periodicals authorization are submitted.
- b. Publications (except foreign) with a paid/requested circulation of 60 percent or less, as shown on PS Form 3526, Statement of Ownership, Management, and Circulation

Note: Publications reviewed by BPA do not require an eligibility review by the Postal Service if the percentage of paid or requested circulation is over 50%.

Forms Used in the Review Process:

The publisher of an authorized Periodicals publication must complete the following two forms:

- a. PS Form 3526, Statement of Ownership, Management, and Circulation (All Periodicals Publications Except Requester Publications). The publisher must submit this form every year by October 1. For a requester publication only, the publisher must submit PS Form 3526-R, Statement of Ownership, Management, and Circulation (Requester Publications Only), rather than PS Form 3526.



b. PS Form 3548, Review and Verification of Circulation. If an eligibility review is required (based on the information in the PS Form 3526 submitted by the publisher), then the Postal Service will notify the publisher that the publisher must also complete and submit PS Form 3548. The publisher completes Column A (“Publisher’s Count”), and BPA completes Column B (“Verified Count”).

Completion of the PS form 3548:

Line 1: “Total Number of Direct Subscriptions (*Including gift subscriptions*).”

Use this line to record all direct subscriptions, including gift subscriptions paid for at a rate above a nominal rate (i.e., more than 30 percent of the basic subscription price).

1. Total Number of Direct Subscriptions (<i>Including gift subscriptions</i>)	All direct subscriptions, including gift subscriptions paid for at a rate above nominal rate (i.e., more than 30 percent of the basic subscription price). Qualified paid individual (not sold through agents).
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From a BPA report, this line would include the qualified paid individual subscriptions not sold through agents.

Line 2: “Total Number of Subscriptions as Part of Dues.”

Use this line to record subscriptions that were paid from a portion of membership dues.

When subscriptions are part of a member’s dues, the publisher must separate the subscription payment, at a rate above nominal, from the dues payment. Publishers must be able to show that subscriptions to their publications are voluntarily made, that the subscription price is paid, and that the relationship of the subscriber is fully understood and agreed to.

If members pay for subscriptions when paying dues in an organization, the organization’s application, transmittal, and billing forms should include clauses that detail the subscription and dues payment.

2. Total Number of Subscriptions as Part of Dues	Subscriptions that were paid from a portion of membership dues. Qualified paid membership benefit.
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From a BPA report, this line would include the qualified paid membership benefit subscriptions.

Line 3: “Total Number of Paid Subscriptions Through Agents.”

Use this line to record mailed subscriptions sold by agents, but do not include newsstand or over-the-counter sales.

3. Total Number of Paid Subscriptions Through Agents	Mailed subscriptions sold by agents, but do not include newsstand or over-the-counter sales. Qualified paid individual (sold through agents).
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From a BPA report, this line would include the qualified paid individual subscriptions sold through agents.

Line 4: “Total Number of Direct Requests Including Internet and Telephone (Only for requester publications).”

Use this line to record direct requests from the subscriber.

4. Total Number of Direct Requests Including Internet and Telephone <i>(Only for requester publications)</i>	Qualified non-paid direct request from the recipient: written, telecommunications, and electronic.	
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From a BPA report, this line would include the qualified non-paid direct request written, telecommunications, and internet subscriptions.

Line 5: “Single Copies Sold Over Counter, Coin Machines, Street Vendors.”

Use this line to record single copy sales other than those through newsstand agents and dealers.

5. Single Copies Sold Over Counter, Coin Machines, Street Vendors	Single copy sales other than through newsstand agents and dealers.	
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Line 6: “Copies Furnished to News Agents and Dealers.”

(a) “With Return Privilege.”

Use this line to record single copy sales through newsstand agents and dealers with return privileges. Record the returned copies in line 16, since they are considered undistributed copies.

(b) “Without Return Privilege.”

Use this line to record single copy sales through newsstand agents and dealers without return privileges.

Copies Furnished 6. to News Agents and Dealers	With Return Privilege <i>(Report returned copies in line 15)</i>		Total Sold ▶	Single copy sales through newsstand agents and dealers (with returns).	
	Without Return Privilege		Total Sold ▶	Single copy sales through newsstand agents and dealers (without returns).	

Line 7: “Copies Purchased in Bulk Other Than News Agents and Dealers/Bulk Requests (Not invariably paid).”

Use this line to record copies paid for in bulk by companies and other organizations for use by their own employees or members.

7. Copies Purchased in Bulk Other Than News Agents and Dealers/Bulk Requests <i>(Not invariably paid)</i>	Copies paid for in bulk by companies and other organizations for use by their own employees or members. Qualified paid group subscriptions.	
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From a BPA report, this line would include the qualified paid group subscriptions.

Copies bought in bulk by hotels, restaurants, or similar establishments for free distribution to their patrons are not paid circulation and must be recorded on line 13.

Line 8: “Other Requested Copies.”

Use this line for requester publications to record requester copies in bulk made for specific persons.

These copies are usually group requests or bulk orders to companies or organizations made by employers at those companies or organizations. To be valid, these requests must specify the employees (by name or position in the company or organization) who are to receive the copies of the requester publication.

This line would also be used for requester publications issued by a membership organization that has adopted a resolution that each member receives a copy of each issue.

8. Other Requested Copies	Copies in bulk made for specific persons. These copies are usually group requests/bulk orders to companies/organizations made by employers at those companies/organizations. Qualified non-paid request from recipient’s company. Also included are non-paid membership benefit copies.
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From a BPA report, this line would include the qualified non-paid request from recipient’s company and qualified non-paid membership benefit.

Line 9: “Advertiser Proof Copies (*No more than one copy per advertiser*).”

Use this line to record advertiser copies.

No more than one copy to each advertiser may be included. Additional copies are recorded in line 13a.

9. Advertiser Proof Copies (<i>No more than one copy per advertiser</i>)	Advertiser copies.	
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Line 10: “Exchange Copies.”

Use this line to record copies that the publisher sends to other publishers in return for copies of their publications.

Only one copy per publisher is counted as paid/requested circulation.

10. Exchange Copies	Copies that the publisher sends to other publishers in return for copies of their publications. (Only one copy per publisher is counted as paid/requested circulation.)
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Line 11: “Other Paid Circulation (Specify).”

Use this line to specify paid circulation not otherwise covered in lines 1 through 10.

Record any subscriber copies delivered other than through the mail.

11. Other Paid Circulation (<i>Specify</i>)	Paid circulation not otherwise covered in lines 1 through 10.	
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Line 12: “Total Paid/Requester Circulation (Lines 1 through 11).”

Add the figures on lines 1 through 11 and record the total on this line.

12. Total Paid/Requester Circulation (<i>Lines 1 through 11</i>)	▶ Add the figures on lines 1 through 11 and record the total on this line.	
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Line 13: “Nonsubscriber or Nonrequester Copies.”

Use this line to record copies that are samples to be distributed to persons who have not paid for or requested copies. Categorize and record these copies in the first six sections of line 13 as follows:

(a) Section a: “Mail Samples.”

Record here any free copies circulated through the mail that are not paid above a nominal rate or not requested. Additional advertiser proof copies are recorded here.

(b) Section b: “Requests Induced by Premium Offer or Other Material Consideration.”

Record here requester copies sent in response to premium offers or other material considerations.

(c) Section c: “Nominal Rate (*Except requester publication*).”

Record here copies sold at a nominal rate (i.e., for less than 30 percent of the basic subscription price).

(d) Section d: “Carrier Samples.”

Record here sample copies sent at no charge to private carriers for distribution to persons who have not paid for or requested the copies.

(e) Section e: “Expired Subscriptions/Requests.”

Record here any expired subscriptions or requests.

For expired subscriptions, publishers may continue to mail copies at the Periodicals rates for up to 6 months after the expiration date.

For requests, publishers may mail copies at the Periodicals rates up to 3 years after the date specified on the request.

(f) Section f: “Other.”

Record here any other nonsubscriber or nonrequester copies (for example, copies given free at a trade show), and specify how the copies are given away.

From a BPA report, this line would include the qualified non-paid communication other than request and passive sources.

(g) Section g: “Total Nonsubscriber or Nonrequester Copies (Sum of lines 13a through 13f).” Add the subtotals in sections a through f and record the total in this section.

13. Nonrequester Copies Copies that are samples to be distributed to persons who have not paid for or requested copies.	a. Mail Samples	Free copies circulated through the mails that are not paid above nominal or not requested. Additional advertiser proof copies are included here.
	b. Requests Induced by Premium Offer or Other Material Consideration	Copies sent in response to premium offers or other material considerations.
	c. Nominal Rate (Except requester publication)	Copies sold at a nominal rate (i.e., for less than 30 percent of the basic subscription price). Paid subscriptions are not valid if sold at a nominal rate.
	d. Carrier Samples	Sample copies sent at no charge to private carriers for distribution to persons who have not paid for or requested the copies.
	e. Expired Subscriptions/Requests	Expired subscriptions or requests.
	f. Other	Any other nonsubscriber or nonrequester copies (for example, copies given free at a trade show). Communication (other than request) and passive sources.
	g. Total Nonsubscriber or Nonrequester Copies (Sum of lines 13a through 13f)	Add the subtotals in sections a through f and record the total in this section.

Line 14: “Total Distribution (Sum of lines 12 and 13).”

Add the subtotals on lines 12 and 13 and record the total on this line.

This total is the paid/requested circulation plus the circulation not considered paid/requested. This is also referred to as the copies consumed.

14. Total Distribution (Sum of lines 12 and 13) (Copies Consumed)	Add the subtotals on lines 12 and 13 and record the total on this line. This total is the paid/requested circulation plus the circulation not considered paid/requested.
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Line 15: “Copies Furnished to News Agents and Not Sold (Returned or destroyed).”

Use this line to record all unsold copies sent to news agents with return privileges. Record only the unsold copies returned by news agents or those documented as returned or destroyed.

15. Copies Furnished to News Agents and Not Sold (Returned or destroyed)	All unsold copies sent to news agents with return privileges. Record only the unsold copies returned by news agents or those documented as returned or destroyed.
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Line 16: “Office Copies, Spoiled Checking Copies, etc.”

Use this line to record the number of copies kept by the publisher.

The publisher must have records to document the number of copies or the actual copies on hand or destroyed.

16. Office Copies, Spoiled Checking Copies, etc.	Copies kept by the publisher.
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Line 17: "Total Production (Sum of lines 14, 15, and 16)."

Add the figures on lines 14, 15, and 16 and record the total on this line.

This total must match the press run.

17. Total Production (Sum of lines 14, 15, and 16)	▶ Add the figures on lines 14, 15, and 16 and record the total on this line. This total must match the press run.	
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Line 18: "Percent Paid/Request Circulation (Line 12 divided by line 14)."

Calculate the percentage of circulation by dividing the total paid or requested circulation by the total distribution.

For Periodicals privileges, this result must be 50 percent or more.

18. Percent Paid/Request Circulation (Line 12 divided by line 14)	Calculate the percentage of circulation by dividing the total paid or requested circulation by the total distribution.	
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Electronic Copies:

Copies of Periodicals publications distributed through email or by accessing a password protected website may be counted toward an approved or pending general or requester publication's eligibility for Periodicals prices. The following conditions additionally apply:

- a. Electronic copies that may be counted toward a publication's eligibility for Periodicals prices:
 1. Must be paid at a price above nominal rate for publications approved in the General category; or
 2. Must be requested in writing or by electronic correspondence for publications approved in the Requester category.
- b. Electronic copies of a Periodicals publication for which access is offered free in conjunction with printed copies of the same issues may not be counted when determining total circulation for the publication.
- c. At least 40% of the total circulation of each issue must consist of printed copies distributed to paying subscribers or requesters, as applicable. Up to 10% of the distributed copies used to qualify or remain eligible for Periodicals prices may be copies that are paid or requested to be sent electronically.
- d. If less than 60% of a Periodicals publication's total circulation consists of printed copies distributed to paying subscribers or requesters, as applicable, annual Postal eligibility audits must be conducted by a certified audit bureau.

USPS' role in BPA audits:

The USPS reserves the right to review all documents and audit procedures relating to the Periodical Rates audits conducted by BPA. At the conclusion of the audit process, BPA's audit findings are forwarded directly to the USPS for review and decision on rate status.