Web Offset: Shorter Runs, Technology Innovations Enable Competitiveness in a New Print World

In a world of short run lengths, personalization, and fast turnaround, can the industry's traditional behemoths, commercial and newspaper web presses, continue to compete? Absolutely, according to industry leaders. Companies like Goss International, MAN Roland, and other web press makers are pursuing innovations that can enable web printers not merely to stay viable but to compete vigorously for more kinds of business than ever before. While most web press print production is advertising-driven, changing trends in the marketplace are reshaping the business model.

Traditionally, web presses offer significant advantages. They're extremely fast and productive, and paper cost for a web run can be as much as 20 percent less than that of cut sheets. Moreover, web presses deliver finished 16- or 32-page signatures, or larger, accommodating an enormous range of publishing and advertising needs. Yet vendors and printers alike recognize that business revisioning and technical enhancements are vital if webs are to compete, domestically and internationally, for their share of a hugely and increasingly diverse marketing communications “spend.”

While a host of new media tools are rapidly emerging to compete for advertising budgets, a recently completed study by the Print Industries Market Information and Research Organization (PRIMIR) found that print run lengths in many important segments are not declining much. In such areas as mass circulation magazines, special interest magazines, newspapers, commercial printing, packaging and catalogs, overall run lengths are expected to remain fairly stable through 2011.

Still, PRIMIR saw an “explosion” in short run printing, brought about largely by clients’ realization that it has become economical to print in run lengths that were never realistic before. Handling shorter run lengths economically will enable printers to attract their share of these new jobs, which can include more customized and personalized work than in the past. And this trend is extending into the web offset world. One need only look toward the book business and other industry sectors where shorter, targeted, and versioned runs are coming into play more than in the past.

“Web presses are reaching down into run lengths that people have not previously associated with webs,” says Bob Brown, CEO of Goss International. “There used to be a cleaner run-length break between sheetfed and web jobs, but the gray area is getting larger.”

“On commercial web presses today, we have customers sometimes running down to 5,000 impressions, which is amazing,” agrees Vincent Lapinski, Chief Operating Officer, Web Operations North.
Adaptation Leads to Innovation

A Washington, D.C.-area subway station is an unusual place to acquire fodder for a column, and indeed, at the time, it wasn’t immediately apparent. On my way to attend NYU’s Annual Prism Awards in June, I hopped the subway in suburban D.C. to make my way to Reagan National Airport. Outside the Metro station, a newspaper man handed out copies of a relatively new tabloid called express. It is a shorter, commuter-friendly version of the Washington Post.

As it was rush hour, the train was packed. Fifteen minutes into the ride, I perused my half of the subway car of about 30 people and noticed two individuals on laptops, two with iPod buds in their ears, and 14 people reading express. Who said newspapers are dying? As I later confirmed in a telephone call with Christopher Ma, the publisher of express, despite the allure of many other means of information transfer, newspapers are still very popular, but not in the old way. No one was reading the Washington Post on the subway that day, most likely because it isn’t designed for the tight confines of a subway car. Yet some innovative thinkers have realized that with adjustments to the old model, specifically format and distribution, the Washington Post can still create a profitable, growth business in the shrinking newspaper industry.

There is no need to cite the multitude of studies that paint a bleak future for newspapers in the U.S. What the Washington Post did was innovate and adapt its current model to create a compelling new piece from a shrinking pie.

Consider another example of success in a challenged sector of print: the small and short-run, quick-print business. Participants at the recent PRIMIR summer meeting had an opportunity to tour VistaPrint in Windsor, Ontario. Robert Keane, who founded VistaPrint, has built a printing company (although some would argue it is actually a technology company that happens to print) in the challenging area of short-runs...very short runs. VistaPrint’s average order is $30, of which they get 15,000 per day...in a market that few printers even consider, let alone develop a business around. But like express, Keane decided there was a place and as it turns out, a very profitable place for business if it wasn’t tied to the old way of print.

Front-end technology has permitted VistaPrint to realize 50 to 60 percent margins on the smallest of orders, most of which are business cards for very small businesses. Between North America and Europe, Keane estimates there are 38,000,000 very small businesses that his product and technology can make very happy. The keys: technology and staff that are more focused on the business, rather than the product. VistaPrint employs eight M.I.T. grads in its I.T. Department, 260 telephone customer service reps, not one with graphic arts background, and a senior staff with few, if any, ties to the printing industry. Like the Washington Post and express, innovation and adaptation have allowed VistaPrint to succeed tremendously in a market that many pass off as dying, dead, or unprofitable.

What are you doing to create and adjust your business model in seemingly highly stressed sectors? Are you playing in a “blue ocean” or “red ocean” sector? And equally important, are you linking your business to customers who think and act like the Washington Post and VistaPrint?

Ralph Nalli
NPES President

The NPES Annual Conference 2006 to Focus on 21st Century Economics, November 4-6 in Ponte Vedra Beach, Florida

NPES members on the leading edge know the future of print has arrived. Industry consolidation, surging international markets, converging cross-media technologies, a changing labor pool, and other elements are driving change at the speed of thought. Our speakers at the NPES Annual Conference will address these and other pivotal issues affecting your business roadmap and bottom line.

The keynote presentation on Sunday, November 5th will be 21st Century Economics, delivered by Dr. Lowell Catlett, an internationally known futurist whose vast knowledge of technologies and their implications on the way we will live and work has galvanized audiences from corporate and association communities around the globe. Other speakers include:

Ravi Bhaskaran, a partner at Fog City Capital and expert on cross border investments between Asia and the U.S., who will discuss The Rise of India and China: Implications for the Printing Industry Value Chain.

Philip Kuehl, senior staff consultant at Westat, who will present Pathways to Greatness, an exposition on “Four Essential Factors for Organizational Success in a Changing Economy” that has inspired leaders in our industry and many others.

The Conference will take on added depth with a star-studded interactive printer panel discussion led by NAPL president Joe Truncale. These printer panels have always been among the most popular features of our Annual Conference program. You’ll also enjoy in-depth tutorials from key industry CEOs, and a world-class level of networking, exchange, and leisure activities that members have come to expect from NPES.

The NPES Annual Conference will be held November 4-6 at the Ponte Vedra Inn and Club, conveniently located 45 minutes southeast of Jacksonville International Airport. A full conference agenda and registration information will be available soon at www.npes.org.
America, MAN Roland. “No one ever thought you would see that on a web press.”

Technology enhancements are also driving greater efficiency in web press environments. While this has long been evident on the commercial heat set web side, where vendors have focused for years on improving productivity through shortening make-ready and job-to-job changeover times, the trend has gained considerable momentum in the newspaper pressroom as well.

“Newspapers are focusing on efficiency and workflow integration to take costs out of their production, much as the commercial side of the business has been doing for years,” says Lapinski. “Now it’s all about automation and bringing computer integrated manufacturing to newspaper production.” He points to CIM projects that MAN Roland has been driving in the U.S. and Europe through the integration of its flagship automation system, printnet, including a recent major order for printnet at The New York Times and one in Denver, in which the client will see a return on investment within a year’s time.

Reducing manpower requirements in the web pressroom is an important part of the competitive strategy, particularly in regions like the U.S., where labor is expensive. American printers increasingly find themselves competing with companies overseas, and differences in labor costs can often be decisive. Consequently, manufacturers have been exploring different technical paths to get more production out of press time while reducing personnel required to run the equipment.

MAN Roland has been active in developing direct digital imaging on press, while Goss’s product strategy has stressed offline imaging using CTP, coupled with automatic plate changing. Another trend for both companies is “non-stop” make-ready. June 2006 saw the first installation of what Goss terms the world’s first web press equipped with Automatic Transfer to complete four-color job changeovers without stopping the press.

Basically, the Automatic Transfer (AT) system enables an eight-unit web press to continue printing one job on four of its units while make-ready proceeds for the next job on the other four units. The changeover from job to job is accomplished while the press is running at production speed. This technology increases the initial cost of a printing system, of course. But this initial outlay can be recouped through savings in make-ready times. For example, a print shop with an average run of 50,000 copies may do an average of a dozen make-readies each day, with each process requiring 20 minutes. If these separate make-readies can be eliminated, the daily savings is roughly four hours.

Innovations in plant automation also impact materials handling throughout the pressroom production chain. Vince Lapinski cites MAN Roland’s extensive work in inventory control and material logistics, encompassing the flow of paper, ink, and other supplies moving from the loading dock to wherever they are needed in the plant. “We’re seeing this technology becoming more prevalent in big commercial plants,” he says, “not only on the back end of the machine, where good things have been done with robotics, but also on the front end.”

Another major technical trend in the web offset world centers on convergence between newspaper and commercial applications. Newspapers, Goss’s Bob Brown says, are expanding their range to “do more of the things commercial printers do in order to be successful.” Vince Lapinski adds that “we see more of our presses sold to newspapers being used for directory work and other commercial applications, thanks to their versatility to be able to print at quality levels on a number of different stocks.”

This convergence is particularly prevalent in Europe and Asia, where traditional newspaper businesses have long been thriving and evolving. In Asia, new publications are springing up continuously and investing aggressively in modern web equipment for production. Contributing to this phenomenon is the spread of literacy and affluence in societies like China.

Much of the value-add being created by web printers comes in the finishing realm, where newspaper publishers are moving quickly to adopt new, automated systems to handle advertising inserts, zoned distribution, and other functions at full press speed. On the commercial printing side, companies are delivering more saddle stitching, adhesive binding, and similar capabilities to support customized content in shorter press runs.

The surging presence of internet-based advertising and marketing, from online catalogs and buy sites to worldwide classifieds on craigslist, is certainly reshaping market spending in every sector. Web press manufacturers and their customers alike know that they have an active stake in driving the R.O.I. of print within a multimedia world – and their outlook is optimistic. “Print volume is going to continue to grow, driven by growth in advertising spending,” says Bob Brown. “We see a lot of opportunity to use automation and new technology to bring web into promising new areas.”

“Ten years from now, we can expect more consolidation within the industry, but you’ll also still see the presence of strong independent printers who have niches they are very successful in,” predicts Lapinski. “With all kinds of new applications emerging in both newspaper and commercial, printers who are progressive with their investments today will certainly be better positioned for the future.”

Between 1990 and 2005, U.S. sales of commercial (heatset) and newspaper (coldset) web offset presses grew 39 percent.
for decades, print has been the media of choice by media buyers... in fact, they are often called "print buyers" because of the volume of print orders they make. It's not to say that print is in disfavor today, but there are far more options available to the media buyer coupled with the fact that many are younger and have grown up with computers and electronic alternatives to print. The concern becomes that these younger buyers have a bias to the electronic alternatives, but why? The primary reason is the rise of the internet as the method of choice to research almost anything a person or business is trying to purchase or find information about. Other reasons tend to deal with the non-flexibility of print. Once something is printed you can't revise it without reprinting it resulting in the waste of your inventory. Unlike the internet, print is difficult for just-in-time worldwide adoption. You have to ship or mail the printed pieces all over the world (push model) whereas with the internet, people anywhere in the world can instantaneously access your website (pull model) at their leisure 24/7 and get the information they desire. Still other reasons deal with the cost of printing, especially in cases when the printed matter becomes dated and must be thrown away. So in relation to the flexibility and interactivity of electronic-based communications, print is at some disadvantage. Obviously, print still has many advantages over electronic communications methods, which is why we are still a massive $165 billion domestic industry today. Most notably, direct mail is the only method to reach every single address in the USA.

When we look at the media pie of today, there are far more options available than there were just 10 years ago. For most of the 20th century, you could choose from radio, tv or print and that was pretty much it! Today the media buyer can choose from:

- Magazines
- Newspapers
- Direct mail
- Network Television
- Cable Television
- Satellite Television
- AM/FM Radio
- Satellite Radio
- Internet advertising

But even of more concern is the plethora of electronic technologies that are just beginning to gain traction in the marketplace that will provide several more alternatives in the media pie. To better understand those technologies and where and when they might begin to displace print revenue PRIMIR, the Print Industries Market Information and Research organization commissioned a study entitled "Electronic Displacement of Print" which was completed at the end of 2005. The study identified the following 13 new technologies (not including the internet) which could have an impact on print:

- Blogs
- Social Networking and social software
- E-books and readers
- E-mail
- Podcasts and iPods
- XBRL
- Really Simple Syndication (RSS)
- Search
- Paper-like electronic displays (E-paper)

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Source: Electronic Displacement of Print, PRIMIR, November 2005
Tablet PCs
Wikis
Wireless technologies
RFID
Supplemental electronic media

Undoubtedly, some of these are familiar to you today and their impact is obvious. For instance, Google is now a household name, as is Yahoo! Their impact as the leaders of the Search industry is well known but their impact on print may not be so obvious. Google alone represents almost $6 billion per year of advertising revenue... revenue that would have gone to other media only five years ago. The chart at left shows each displacing technology and the print industry segment where they will eventually have an impact.

Since early May, NPES staffers have been contacting members as part of a recently launched Membership Outreach Program. Just as you – our member companies - make routine customer calls to keep in touch with your clients, NPES is following suit and phoning members to get your thoughts on the industry, our programs and services, and the future direction of the Association.

The goal of the program is to contact every NPES member by the end of the year. From a staff perspective, the effort is comprehensive, with everyone, from the receptionist to the president, getting involved.

NPES President Ralph Nappi, who spearheads the program, notes that “We recognize that we can’t take the loyalty of our members for granted. We have to make sure that we’re always meeting member needs – and the only way to know that is by asking. The feedback coming in from these calls is proving to be extremely valuable to us.”

“I appreciated the call,” said Mark Doxtader, President of Carton Craft Supply in the Atlanta area, when he was contacted in June. “Like many small businesses, we just get so absorbed in day to day details that we forget to take time out for the kind of industry info exchange that groups like NPES provide.”

Jim Raffel, CEO of ColorMetrix Technologies in Wisconsin, was also called in June and echoed this sentiment. “NPES is a strong organization, and I do actively recommend it to my peers. The fact that you’re reaching out to the base is bound to be a helpful reminder about the benefits you offer.”

In addition to calling members, NPES is also supporting personal staff visits out to member companies. “Getting face-to-face time with members in their own work environments is time well spent,” says Marketing/Communications Director Doug Sprei. “You can’t beat it as source of impressions and information about what’s happening in every niche of our industry.”

To date, more than 180 member calls and over a dozen member visits have been made. If you have not yet been contacted, please take a few moments to speak to us when you are called. Your input is critical to ensure that NPES continues to meet the needs of member companies, and learn about your business and challenges. If you would like to reach NPES before NPES reaches you, just call or e-mail Ralph Nappi at (703) 264-7200 or mappi@npes.org.
Founded in the mid 1970s, GT Graphic Technology, Inc. has enjoyed a steady climb to success within a niche of the industry that some would characterize as “well lit” or even “illuminating.” At its small facility in upstate New York, the company designs and manufactures state of the art viewing stations for ultra-precise proofing of color printing and photography. Vice president Robert McCurdy is active running the business along with his father, Fred, the founding president. I toured the company in July and sat down in conversation with Robert McCurdy. - Doug Sprei

What forces in the industry are driving opportunities for GTI?

Right now the biggest thing is digital workflow, and the combination of photographic techniques, printing techniques, and tools that are all merging. The image is now digital from day one.

You could be talking to a photographer who is trying to output a dozen prints on an inkjet printer. He is as concerned about repeatability and accurate color rendition on those prints as somebody doing a million run job for Time, Inc. He needs the same tools. Obviously you are talking about a one-person operation, but he's going to need the same light quality, control, and consistency – because he's looking at a print and communicating with his client who could be a publisher, a catalog house, or the printer who is ultimately going to run the images on a brochure.

The material coming off presses and going into your proofing stations includes catalogs, signage, greeting cards, photography...

...Not to mention stamps, and even currency. Believe it or not, there's an authentic currency producer in Nigeria who purchased one of our viewing systems to check their color.

What new standards and refinements stand out in your 30-year history?

When we started, we were working with American National Standard which related to the North American Continent for viewing in the printing graphic arts application. In 2000 that was replaced by ISO 3664, a worldwide standard for illuminating color images for quality control evaluation. That tightened certain specifications, making it more consistent around the world and more difficult as a manufacturer to make sure that you’re complying. The reality is that some clients’ needs are far more difficult to match than that, and we are well versed at meeting their requirements on a specialized basis. But for the general market, this ISO spec and its standards and tolerances are very good.

Do you look at how your products are being deployed in the field and get input from customers about how you can improve?

We have a service called Light Support that involves measuring the technical characteristics of the viewing systems both at the client, like a publisher, let's say, as well as at their printer. So we can immediately see whether there is good color correlation between where the creative work originates and what comes out replicated in the pressroom.

From that we've developed a very large database of information about what our viewing systems will look like five or ten years down the road compared to new systems in clean or dirty environments. We really have a great idea of what we are up against in terms of delivering consistency.

You mentioned photographers, a different population from printers, yet convergences between the two are stronger than ever. How has that affected your business?

With digital cameras and the new technologies out there that enable printing in different formats, we've developed a range of products for wide format that relate very well to companies that are doing fine art reproduction, actually printing on canvas and producing something that looks just like an artist just took his brush off it. That is very, very critical imaging work – so it's fun.

Do you look at the overall position of print within the cross-media communication world and see that changing and affecting your business?

We do, with the same concern and anticipation that most people in the printing industry are showing. You can look back and see where new technology came along and affected existing technology. Theoretically you might have said, “Gee, this is going to replace it,” but that hasn’t happened because the experi-
enence is different. When you are looking at a catalog or magazine and reading an article, there's an interaction between the paper and the person reading it. I don't see that yet being replaced by a screen. Print is a great medium to reach people. You may not see the leads responses from print advertising, because people will access your information online, and take it to the next step online.

As a niche-oriented company, how do you market and develop your business most effectively?

We exhibit at a lot of trade shows, like Graph Expo, Ipex, Photokina, and that continues to be an effective marketing vehicle for us. Another thing is that our product is a key contributor to the successful implementation of any color imaging device. We have relationships with Adobe in a big way, as well as Apple, HP, Komori, Heidelberg...almost anyone who makes an imaging device. Ultimately when that sheet comes off a press, someone is looking at it with a critical eye, and our product influences what they see.

Do you see more international business development on the horizon?

Absolutely; the weak dollar is helping exporters. The market in Europe has been growing, our U.K. office has been very active since 2000. The new office in Germany is getting up to speed, and we have a lot of good things coming.

A small, family owned business, manufacturing in upstate New York... interesting combination.

It is. It works!

What makes it work? Doing business in New York State can be challenging, by many accounts.

It's true. The government is our partner in a venture called capitalism, but there are a lot of services the government needs to provide and they aren't bashful about asking for assistance. Yeah, it's a challenge; therefore our costs may be higher than some other states or countries. But the work we are doing is of such a specialized nature that we are able to cover those costs by employing, and retaining, very skilled people that are hard to replace. That's a key benefit.

NOTES FROM NPES GOVERNMENT AFFAIRS

JUDICIARY COMMITTEE APPROVES H.R. 3509

A NEW STATUTE WOULD REDUCE THE BURDEN OF UNREASONABLE LAWSUITS

Good news for NPES member companies: The Judiciary Committee of the U.S. House of Representatives has approved the Workplace Goods Job Growth and Competitiveness Act of 2006. If enacted into law, the legislation would provide a federal 12-year statute of repose for liability claims arising from injuries incurred on workplace durable goods, where workers’ compensation is available to the claimant.

What is a statute of repose?

A statute of repose specifies that after a certain length of time, in this case 12 years, an injured party can no longer file a product liability suit. Twelve states currently have statutes of repose ranging from six to fifteen years. If passed, this legislation would preempt those state statutes and provide a national 12-year standard.

What does this mean for you?

Judiciary Committee approval of H.R. 3509 is a major advance for the legislation and a significant victory for NPES members. Injured workers often see NPES member companies as deep pockets in injury claims stemming from accidents on workplace printing equipment. In the vast majority of these cases, these injuries are the result of unsafe workplaces and/or practices, and are not the result of defective equipment. If passed, H.R. 3509 will reduce the burden of costly legal fees associated with defending these unfounded and burdensome product-related lawsuits on over aged equipment. It is important to note, however, that this bill only applies to cases where workers’ compensation is available.

An important amendment

Under amended provisions of the bill, the statute of repose will not apply if the cause of injury was a product defect that was fraudulently concealed. A clear definition of the term “fraudulent concealment” was included in order to reduce the number of arduous product-related lawsuits. Congressman Dan Lundgren (R-CA) offered the amendment that included this definition, and deserves much credit for this key refinement of the bill.

What’s next?

The next step in the legislative process is for the Judiciary Committee to issue a report on the bill in preparation for a vote on it by the full House of Representatives in September. The goal is to advance the bill as much as possible before the approaching final days of the 109th Congress.

What can I do?

Take note of the fact that the legislation is sponsored by Congressman Steve Chabot (R-1-OH), and co-sponsored by Congressmen Henry Hyde (R-6-IL), Howard Coble (R-6-NC) and Mark Green (R-8-WI). NPES has sent letters of congratulation and thanks to Congressman Chabot, Judiciary Committee Chairman James F. Sensenbrenner (R-5-WI) and the other members of the House Judiciary Committee who voted for H.R. 3509. NPES urges its members to also thank these members of congress, especially if they represent districts in which NPES member facilities are located. For more information, contact NPES Government Affairs Director Mark J. Nuzzaco at 703-264-7235, FAX 703-620-0994, or mnuzzaco@npes.org.
PRIMIR TO LAUNCH FIVE NEW RESEARCH STUDIES

The PRIMIR Executive Committee met in Windsor, Ontario this past July to map out new research studies for the coming year. Five task forces were formed for the following 2007 studies:

Future Trends in General Commercial Printing

This study will provide an overall industry assessment and trends for the future of general commercial printing in North America in 2007 using 2006 as the base year. It will profile the number of plants by geographic region, identify markets served and profile the typical products produced. It will also provide a profile of equipment and estimate consumables utilized.

Global Trends in Packaging

This study will identify how packaging trends vary on a worldwide basis by region and will delve into labels, folding cartons, corrugated, flexible and retort pouch packaging and specific substrate and coating requirements. The study will evaluate food versus other packaged goods and identify the package format specifiers and their future needs.

Trends in Sheetfed Lithography

This North American study will evaluate the current and future trends in sheetfed press technology. Markets covered will be general commercial, packaging and specialty. The study will identify trends in consumable usage by end use or application and evaluate hybrid workflows with digital printing.

Market Potential and Installed Base for Traditional Bindery/Finishing Technologies

This study will profile the North American installed base of in-line and off-line production bindery/finishing equipment and address barriers and drivers for bindery investment decisions. It will delve into the drivers and barriers in the decision process for new vs. used equipment. It will identify bindery areas where printers still depend upon manual hand labor operations, and areas in greatest need for automation.

Effect of Postal Reform on the Demand for Print

This study will evaluate the effects of postal reform and potential postage increases on the demand for print, evaluating the impact on various print markets such as commercial printers and inplants. This study will identify the "trickle down" effect postage changes have on all segments of the printing industry value chain.

For more information on these or other PRIMIR studies, please visit www.primir.org or contact Jackie Bland at j bland@npes.org.

SAVE THE DATE!

NPES ANNUAL CONFERENCE

NOVEMBER 4-6
PONTE VEDRA INN & CLUB
PONTE VEDRA BEACH, FLORIDA

“TELL IT LIKE IT IS” SESSIONS HIGHLIGHT EXECUTIVE OUTLOOK® 2006 PROGRAM

What are the next “disruptive technologies” lurking in the wings waiting to stir up the printing business? Where should printers direct investment dollars today to enhance their success tomorrow and stay ahead of competitors?

These are among the probing questions that will be answered for attendees at the annual EXECUTIVE OUTLOOK® Conference on Saturday, October 14 at McCormick Place in Chicago.

Held the day before the opening of GRAPH EXPO® and CONVERTING EXPO®, the all-day conference presents information on a variety of technologies — changes to the old and established, significant evolutions and improvements to technology, and most importantly, emerging and/or new or about-to-come-on-to-the-market technology. This year’s conference theme, Connecting Technology for Profit, will shape a full day of general and breakout sessions, including the “Tell It Like It Is” sessions which will assess the current and future status of a wide range of industry technologies, including concrete recommendations for effective investments.

EXECUTIVE OUTLOOK is part of a 60+ session seminar program that accompanies GRAPH EXPO and CONVERTING EXPO. Complete information about the program and the show is available at www.gasc.org.

JUST THE FAX

The Direct Marketing Association (DMA) has issued a set of fax guidelines, following the Federal Communications Commission’s release of regulations to implement the Junk Fax Prevention Act of 2005. Here is part of what fax marketers must know to comply with the law that takes effect later this year:

• Faxes containing unsolicited advertisements are subject to notice and opt-out requirements. An unsolicited advertisement is “any material advertising the commercial availability or quality of any property, goods, or services.”

• All faxes, whether unsolicited or solicited and whether sent by fax machine or computer, must include the date and time sent, registered name, and phone and fax numbers of the company sending the fax.

• Opt-out notices must appear on the first page of the fax, be clear and conspicuous and be separate from the advertising copy.

• Opt-out notices should clearly state that the recipient may opt out of any future faxes, provide clear instructions for doing so and list one cost-free domestic telephone and separate fax number for transmitting the request.

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