REGULATIONS CONCERNING CLASSIFICATION
Changes that Modify Product Lists : Docket No. RM2019-3

COMMENTS OF THE GREETING CARD ASSOCIATION

The Greeting Card Association (GCA) files these Comments pursuant to Order No. 5088 (May 8, 2019).

GCA is not suggesting changes in the language of the proposed rules, but only that the Commission, in any order adopting them, clarify the scope of both the “impact” and “chapter 36 policies” provisions (39 CFR sections 3020.111(a)(2) and (3), respectively).

Not all of the provisions of the Postal Accountability and Enhancement Act of 2006 which might prove relevant in the case of a weight or shape limit change potentially affecting a product list are found in chapter 36 of title 39, U.S.C. For example, section 403(c), forbidding undue or unreasonable discrimination or preference, is not part of chapter 36. The same is true of section 404(c), providing for a class sealed against inspection, with nationally uniform rates.

The Commission would no doubt act correctly in considering these provisions under proposed section 3020.111(a)(3), via the “just and reasonable” provision of objective (b)(8), the impact analysis required by proposed section 3020.111(a)(2), or both. However, it would be helpful to make it explicit, if these proposed rules are adopted, that issues implicating these non-chapter 36 provisions will be considered and decided.
GCA suggests that a Commission order adopting the proposal make clear that issues covered by a provision outside chapter 36 will receive full consideration.

June 13, 2019

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. 1B
Arlington, VA 22206-1450
(703) 998-2568
(703) 998-2987 fax
E-mail: postamp02@gmail.com