

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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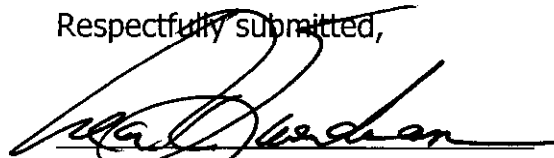
Docket No. R2000-1

**RESPONSES OF GREETING CARD ASSOCIATION
WITNESS ERICKSON TO INTERROGATORIES OF THE
UNITED STATES POSTAL SERVICE
(USPS/GCA-T1-1-7)**

Greeting Card Association hereby provides responses of witness Erickson to the following interrogatories of the United States Postal Service (USPS/GCA-T1-1-7).

Each interrogatory is stated verbatim and is followed by the response.

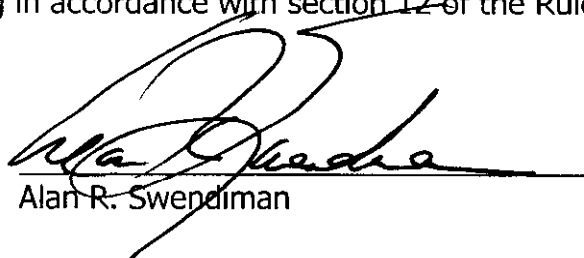
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the preceding document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Alan R. Swendiman

Dated: June 20, 2000

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USPS/GCA-T1-1. Please refer to the following passage which appears on page 8 of your testimony:

It has been suggested that one – perhaps the only – “objective” way to measure the value of greeting cards to recipients is at the point of sale of a stamp. The economist witness Bernstein, in response to GCA/USPS-T41-6, writes that sending a birthday card “reflects the mailer’s view of the value of the birthday card to the recipient.” While this may in some respects be true, the mailer’s and the recipient’s views of the value of that birthday card to the recipient are not necessarily congruent.

a. With respect to the first sentence of that passage, please identify your understanding of exactly who made the suggestion to which you refer in this sentence, and exactly where that suggestion appears.

b. Please confirm that witness Bernstein, in his response to GCA/USPS-T41-6, identifies at least three cost factors which the sender implicitly or explicitly weighs against the perceived value of sending a birthday card – the cost of the time it takes, the cost of the card itself (e.g., \$1.75), and the cost of the postage (e.g., 33 or 34 cents). If you cannot confirm, please explain fully.

c. Would you agree that the time it takes to send a greeting card may include the time it takes to get to a retail location, the time it takes to select a card, the time it takes to purchase the card once selected, the time it takes to sign or otherwise annotate the card, the time it takes to retrieve the recipient’s complete address and address the envelope, the time it takes to obtain postage (if none is already on hand), and the time it takes to mail the card? If you do not agree, please explain fully.

d. Please confirm that individuals who mail greeting cards are also likely to be the recipient of greeting cards. If you cannot confirm, please explain fully.

RESPONSE:

a. I refer to witness Bernstein's response to GCA/USPS-T41-6. My reading of that response suggested to me that, for purposes of setting postal rates, the price of postage was seen by witness Bernstein as the best and most

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objective means of measuring value to recipients because, as witness Bernstein states at the beginning of his response, "mail services are a joint activity between the sender and the recipient. . ." Witness Bernstein goes on to note the costs associated with sending the card, which are not, in my analysis, the same as the cultural value of the greeting card to the recipient.

b. Confirmed.

c. I do agree that those time factors enter into the purchase of a greeting card and the purchase of postage for that card, if none is at hand. Of course, these do not directly reflect or predict the quantitative or qualitative value of the greeting card to the recipient.

d. Confirmed.

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USPS/GCA-T1-2.

a. Do you agree that your testimony describes at some length what you believe to be the cultural value (e.g. social value, symbolic value, etc.) of greeting cards? If you do not agree, please explain fully.

b. Would you agree that the consumer research you discuss in section VIII of your testimony indicates that consumers are quite cognizant of the cultural value of greeting cards? If you do not agree, please explain fully.

c. Please confirm that consumers can reasonably be expected to take the cultural value of greeting cards into account when deciding whether to send a greeting card on any particular occasion. If you do not confirm, please explain full.

RESPONSE:

a. I agree, with this clarification. I take the social value of greeting cards to be different than their cultural value. Likewise, their symbolic value may be different, both qualitatively and, depending upon the measurement scheme devised by the researcher, quantitatively from the cultural value of greeting cards as well. The social, cultural, and symbolic dimensions of greeting cards are different. Symbolic and social values may be represented and reproduced in the cultural tradition of sending greeting cards, but these do not exhaust the cultural value of greeting cards. My testimony focuses on the cultural value of greeting cards.

b. I disagree. I would say that consumers are aware of some of the potential social value of a particular instance of greeting card sending--especially if they are the senders. And I would agree that in a general way, many

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consumers are aware of some of the cultural value of greeting cards. But not all consumers share the same knowledge of the value of greeting cards.

It is a well-accepted premise in anthropology, and in the human sciences generally, that elements of culture have a reality beyond that which is known by members of a culture. That is, many features of culture exist outside of daily conscious awareness. For that reason, I believe that consumers are not "quite cognizant" of the cultural value of greeting cards.

c. Not confirmed. It is unlikely that all or even most consumers are fully aware of even the more accessible and immediate social values of greeting cards. Without being present when greeting cards are received, it is difficult for senders to know exactly what the recipient does with the card. What the recipient does with a greeting card is, I believe, an indicator of the kinds and degrees of value greeting cards hold for a particular recipient. Senders take only some of the cultural value of greeting cards into account--they are aware of some of the immediate social value in sending the card, which is but one part of its cultural value. See also response (b), above.

USPS/GCA-T1-3. Please refer to page 9 of your testimony, where you discuss gifts and other material goods that arrive in the mail without being paid for by the recipient.

a. Would you agree that a material good (for example, a piece of jewelry) that arrives in the mail has different cultural value to the recipient depending upon whether it is a gift or has merely been ordered by the recipient from a catalog? If you do not agree, please explain fully.

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b. Do you believe that the Postal Rate Commission should attempt to determine what proportion of material goods traveling in various subclasses of mail are gifts, in order to have the requisite information on cultural value to be able to recommend appropriate rates for each subclass? If not, please explain fully.

RESPONSE:

a. I agree that gifts and purchases have different cultural value.

b. It is my understanding as a lay person that the Postal Rate Commission is required by statute to consider ECSI criteria in setting postal rates. I believe that there are patterns in the kinds of cultural value present in different sub-classes of mail that could be the subjects of empirical inquiry. I cannot speculate a priori about the extent to which knowledge of such differences might assist the Postal Rate Commission.

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USPS/GCA-T1-4. Please refer to page 9 of your testimony, where you discuss gifts and other material goods that arrive in the mail without being paid for by the recipient.

a. Do you believe that advertising catalogs received in the mail (for which recipients do not pay) have different value to different recipients? Please explain your answer fully.

b. Do you believe that advertising catalogs (for which recipients do not pay) have cultural value? Please explain your answer fully.

c. Are you aware of any studies, by anthropologists or anyone else, addressing the cultural value of advertising? If so, please identify those studies, discuss your general understanding of their conclusions, and indicate how those conclusions compare with your conclusions regarding greeting cards.

d. Would you agree with a restatement of the sentence on lines 18-20 on page 10 of your testimony to the effect that "[f]rom design to disposal, an advertising catalog can come to have multiple kinds of cultural value placed upon it by the people who interact with it and through it"? If not, why not.

e. Are you aware of any studies that examine the "itinerary" of an advertising catalog? If so, please provide a citation for any such studies, and state their general conclusions.

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RESPONSE:

a. Advertising catalogues received in the mail no doubt have different value to different recipients. The social value of any good received in the mail (and other dimensions of value as well) will depend on the relationships between that good and the social lives of those who interact with that good.

b. All material objects that form part of any culture have cultural value. Advertising catalogues are a part of American culture and have cultural value. I have not studied the particular cultural value of advertising catalogues, but as everyone knows, they are not the same as greeting cards -- their cultural value is different.

c. I am aware of studies by anthropologists of the advertising industry. One well-known contemporary study was conducted by Daniel Miller in Trinidad, and reported in Chapter 5 of his book, Capitalism: An Ethnographic Approach (New York: Berg, 1977). Miller documents how the interplay between local and extra-local forces shape advertising campaigns for soft drinks in Trinidad (where soft drinks are called sweet drinks). His analysis is congruent with my analysis of greeting cards in several ways. First, he demonstrates how commodity products are reshaped and reinterpreted when they are purchased, used, and disposed of in different social and cultural settings. And Miller demonstrates how the cultural complexities in sweet drink production in Trinidad relate to wider cultural features in Trinidadian society. He also shows how the cultural value of sweet drinks--

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and the institutions that surround them--hold somewhat different cultural value in different segments of Trinidadian society.

Two other studies come to mind. One by Frederick Errington and Deborah Gewertz appears in Vol. 98 No. 1 of the 1996 edition of the journal American Anthropologist. Their article, "The Individuation of Tradition in a Papua New Guinean Modernity" (at pages 114-126) documents the reproduction and reshaping of traditional cultural images by advertising. Another is by Susan Terrio, in the same issue of that journal. Her article, "Crafting *Grand Cru* Chocolates in Contemporary France" (at pages 67-79) details the itinerary of a commodity product--chocolate--and shows how it reflects some elements of French national culture and reshapes other elements. All these studies show how changes in traditions are shaped by the interplay of local and global cultural forces, including market forces; all these studies focus on the cultural value of contemporary material goods by documenting their manufacture, marketing, and use. Note, however, that the cultural values and effects addressed in the studies differ from those associated with greeting cards.

d. Within the narrow scope of interaction that is framed by a mail order catalogue, I agree that multiple kinds of cultural value are placed on the catalogue by those who interact with it and through it. On the other hand, my ethnographic understanding of American household consumption suggests that individuals do not communicate using catalogues in the same way that they

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communicate by using greeting cards. I don't agree that people interact through the use of mail order catalogues, as the revised quotation might suggest.

e. No.

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USPS/GCA-T1-5. At the top of page 9 of your testimony, you identify the item of American culture that you are addressing in your testimony as "the greeting card that is sent through the mail." The explicit limitation of your analysis to cards that travel through the mail appears in several parts of your testimony (e.g., pg. 4, line 2; pg. 8, line 11; page 10, lines 14-15).

a. Is the cultural value of a greeting card exchanged in person different than the cultural value of a greeting card that is mailed? Please explain your answer fully.

b. Wouldn't your "itinerary" methodology be the ideal way to explore any differences in the cultural value of cards that are mailed and cards that are not? Please explain your answer fully.

c. For purposes of setting postal rates, wouldn't you agree that differences in cultural value which relate specifically to the ability to send greeting cards by mail would be much more relevant than the general proposition that greeting cards have cultural value (upon which you claim, at line 10, page 8, that an apparent consensus already exists)? Please explain your answer fully.

RESPONSE:

a. Yes, a greeting card exchanged in person has a different cultural value than one that is mailed. A greeting card that comes through the mail travels to its destination through a postal service, an important cultural feature of nearly every contemporary culture. Greeting cards may be given in person; the social and symbolic value of this kind of giving varies considerably with the occasion and with the relationship between giver and receiver. The cultural value of greeting cards, generally, is manifested and reproduced in both kinds of giving. But for some consumers, especially those for whom travel - and hence meeting face-to-face with those from whom greeting cards may be received - is difficult, greeting cards that come through the mail have a greater potential of

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actually being received and are, therefore, of special importance to the maintenance of the cultural tradition of greeting card exchange.

b. Yes, this method could explore the difference in the cultural value surrounding both kinds of greeting cards. An ethnographic exploration of the itinerary of a greeting card that comes in the mail would explore the context surrounding the sending and receipt of the card, including the constraints and incentives that surround its sending, use, display and disposal.

c. As a non-lawyer, I can only speculate on what might be most relevant, but I believe that attention paid to "differences in cultural value which relate specifically to the ability to send greeting cards by mail" may ignore the cultural value of greeting cards to recipients. It is the value of greeting cards to recipients that is the main focus of my testimony.

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USPS/GCA-T1-6. You present your testimony as an apparent response to the question "how can one measure the value to recipients of greeting cards that come in the mail," which is posed at lines 10-11 on page 8 of your testimony.

a. Would you agree that, at least in the context in which the term appears in your testimony, the primary purpose of "measuring" an item or category of items is to create a frame of reference by which other items or category of items can be compared to the item or category of items under analysis? If not, please explain fully.

b. What is the unit of measure of cultural value that you employ in your testimony? Please explain fully.

c. If someone were interested in comparing the cultural value of greeting cards sent through the mail with the cultural value of other items sent through the mail, such as magazines, books, collectables, tapes, museum catalogs, goods ordered from museum catalogs, newspapers, etc., how would your testimony assist in that objective? Please explain fully.

RESPONSE:

a. I disagree. In many cases of ethnographic research, the purpose of measurement is to determine if a category of thing exists or not. Often, measurement of a cultural feature is done for comparative purposes - but such comparisons are not always the goal sought. The creation of a "frame of reference," as I understand the term, derives from the theoretical approach--the epistemological and ontological stance adopted by the researcher(s). Measurement can not determine a frame of reference, though it may reflect it. Whether a measurement allows comparison depends upon the nature of the scale of measurement employed.

b. My testimony is not focused on numerical measurement but instead aims to describe how value may be understood in context.

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I have in prior research devised a scale of cultural salience for individual questions about key elements of the cultural value of greeting cards. This was reported in my testimony. An aggregate measure of the partial cultural value of greeting cards, limited to the questions asked, could be derived from those responses. My testimony describes the cultural value of greeting cards to recipients, and suggests that cultural value can be documented through empirical study of the itinerary of the greeting card.

In any case, a single unit of measurement would not be adequate to describe the cultural value of a greeting card. (I believe most of my colleagues would agree that measurements are a sort of focused and narrow description, often amenable to statistical study). Narrative, non-quantitative description, such as that produced by the study of actual human behavior in its context, can be considered a kind of measurement but not the kind of measurement that lends itself to tests of statistical significance. There is little doubt, however, that such qualitative descriptions have substantive significance. I maintain that such descriptions have substantive significance for evaluating the cultural value of greeting cards.

c. Further study might suggest parallels. The itinerary approach might be a valuable way to study the cultural value of other items sent and received through the mail. But my testimony is directed at the cultural value of greeting cards, and without a review of specific cultural features like catalogues or

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collectibles, it is difficult to know exactly how--or whether--my testimony might be of use.

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USPS/GCA-T1-7. Please refer to lines 8-9 on page 20 of your testimony, where you poses [sic] the question "[i]f the price of sending a greeting card through the mail were to increase, what would that mean to people for whom greeting cards are especially salient?"

a. Please confirm that the cultural value of a greeting card is unaffected by the price of the postage at which it is sent. (In other words, even if the price of mailing a greeting card were to increase from 33 cents to 34 cents on a given date, the cultural value of any particular card sent by the same sender to the same recipient would be the same whether it was sent before or after the rate increase.) If you cannot confirm, please explain fully.

b. Please confirm that the aggregate cultural value of greeting cards is affected by an increase in the rate of postage only to the extent that the rate increase causes fewer cards to be sent. If you cannot confirm, please explain fully.

c. Does your testimony provide any basis to assess the extent to which the relevant rate increase proposed by the Postal Service to send a greeting card (33 cents to 34 cents) would cause fewer cards to be sent? Please explain your answer fully, unless it is an unqualified "No."

RESPONSE:

a. Not confirmed. My testimony does not address the particular value of a greeting card, but the cultural value of greeting cards generally as part of American culture. If, as economists describe it, the volume of mail is effected by the price of postage, then I would expect the volume of greeting cards sent through the mail to decrease as postage increases. The volume of cards is one indicator of their cultural value, as is their presence or absence in the mailpacket among a group of potential receivers.

b. Not confirmed. The cultural value of greeting cards is not evenly distributed among Americans. My research has shown that greeting cards are

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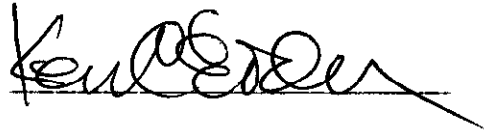
more salient, in the aggregate, among certain kinds of consumers, particularly lower income Americans, African Americans, and Latinos. For this reason, a decrease in the number of greeting cards does not reduce the cultural value of greeting cards in a uniform, linear way.

c. No.

DECLARATION

I, Kenneth C. Erickson, declare under penalty of perjury that the answers to interrogatories USPS/GCA-T1-1-7 of the United States Postal Service are true and correct, to the best of my knowledge, information and belief.

Executed June 20, 2000

A handwritten signature in black ink, appearing to read "Ken Erickson", written over a horizontal line.