

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

Complaint on Stamped Stationery

Docket No. C2004-3

**DOUGLAS F. CARLSON
ANSWER IN OPPOSITION TO THE POSTAL SERVICE
MOTION TO DISMISS COMPLAINT**

January 24, 2006

I. INTRODUCTION

On June 24, 2004, I filed a complaint concerning Postal Service stamped stationery.¹ On August 31, 2004, the Postal Service filed its answer.² In its answer, the Postal Service promised to file “shortly” a motion to dismiss the complaint. Answer at 8. While we waited more than 16 months for the Postal Service to file this motion, the Postal Service began selling a second stamped-stationery item, the Garden Bouquet Stamped Stationery, which first appeared in the fall 2004 issue of *USA Philatelic*. This stationery also sells for \$14.95 for a pack of 12 sheets (with a postage value of just 37 cents — a staggering markup of 87.6 cents per sheet). On January 4, 2006, the Commission issued Order No. 1449 and defined the term “postal service.” The order required the Postal Service to file its motion to dismiss by January 17, 2006. The Postal Service filed its motion³ on January 18, 2006. I hereby oppose the Postal Service’s motion.

In this opposition, I will describe the long history of stamped letter sheets, the generic term for “stamped stationery.” I will distinguish stamped stationery

¹ Douglas F. Carlson Complaint on Stamped Stationery (“Complaint”), filed June 24, 2004.

² Answer of United States Postal Service (“Answer”), filed August 31, 2004.

³ Motion of the United States Postal Service to Dismiss Complaint (“Motion”), filed January 18, 2005.

from philatelic items that are not postal services. I will explain how closely stamped stationery parallels stamped envelopes and stamped cards, two postal services that the Commission has properly regulated for up to three decades. I will explain that the characterization of an item as a “philatelic item” is irrelevant to the determination of whether the item is a postal service. Finally, I will argue that the Commission, in setting a fee for a postal service, would not consider the philatelic value of a particular product that facilitates use of a postal service, and therefore the Commission would not be charged with determining the artistic value of a product such as the Disney or Garden Bouquet stamped stationery.

II. HISTORICAL BACKGROUND

In my complaint, I explained that stamped stationery is substantially similar to stamped envelopes and stamped cards. Complaint at 3, ¶ 15. I also noted that section 960 of the Domestic Mail Classification Schedule is titled “Stamped Paper”, and stationery is paper. Complaint at 3, ¶¶ 19 and 20. In addition, I noted that stamped stationery is substantially similar in use and function to aerogrammes, a traditional postal service that the Postal Service sells for international airmail. Complaint at 2, ¶ 7.

After filing my complaint, I learned that the products that the Postal Service is calling stamped stationery are known generically as letter sheets. Letter sheets have a long history dating back to the early days of our country, when people wrote letters by candlelight. According to the Web site *www.postalstationery.org*, the earliest forms of postal stationery⁴ were letter sheets and envelopes.⁵ Aerogrammes, which resemble the recently issued “stamped stationery” in form and function, are known as “air letter sheets.”⁶ Even the Postal Service describes aerogrammes as letter sheets. *International Mail Manual* Issue 32, § 251.21. For clarity, in this opposition, I will describe

⁴ The Web site defines postal stationery as “postal matter which either bears an officially authorised pre-printed stamp or device or inscription indicating that a specific face value of postage or related service has been prepaid.” http://www.postalstationery.org/html/stationery_is.html

⁵ <http://www.postalstationery.org/html/guidelines.html>

⁶ *Id.*

letter sheets sold by the Postal Service with postage pre-affixed as “stamped letter sheets” and “stamped air letter sheets” to distinguish these products from their unstamped, generic versions, which are known as letter sheets and air letter sheets.

According to the National Postal Museum’s Web site, a postal regulation in 1794 specified that letter sheets would be charged the rate for one-quarter ounce.⁷ Envelopes made their appearance in the late 1840’s.⁸

The earliest letter sheets were not postal stationery (i.e., stamped paper). Stamped letter sheets did not arrive until 1861. According to *Linn’s Stamp News*,⁹ in 1861 the Post Office Department issued a pink 3-cent George Washington embossed stamped letter sheet on blue paper. The Post Office Department withdrew this item from sale in 1864. In 1886, the Postal Service issued a 2-cent Ulysses Grant stamped letter sheet, which was printed in green on egg-shell-colored paper. The stamped letter sheet was popular with the public. Production continued until 1894, and the stamped letter sheet remained on sale until 1902. Photographs of these letter sheets from the *Linn’s Stamp News* article appear in Appendix 1. *Linn’s Stamp News* reported that the Disney stamped letter sheets were the first domestic stamped letter sheets issued in more than a century.

Stamped letter sheets, stamped envelopes, and stamped cards are forms of postal stationery. Envelopes and post cards also are available without postage, and years ago letter sheets were available without postage as well. The Postal Service now sells all three as pre-stamped postal stationery. Stamped envelopes and stamped cards are classified under DMCS 960. Stamped letter sheets are no less of a postal service than stamped envelopes and stamped cards. No one would seriously question that the aerogrammes that the Postal Service sells provide a postal service to the public. Aerogrammes are

⁷ <http://www.postalmuseum.si.edu/statepostalhistory/studyofpostalsystem.html>

⁸ *Id.*

⁹ *Linn’s Stamp News*, June 28, 2004.

stamped *air* letter sheets. Services that the Postal Service was providing in the 1800's, long before the agency branched out into selling keychains, coffee mugs, and phone cards, surely are deeply rooted in the nation's understanding of what a "postal service" is. Whether an electronic postmark is a postal service is an interesting question that arises at the intersection of traditional postal services and modern technology. Stamped letter sheets, on the other hand, date back to 1861 and are a traditional postal service.

III. STAMPED STATIONERY IS A POSTAL SERVICE

In Order No. 1449, the Commission defined a postal service to mean "the receipt, transmission, or delivery by the Postal Service of correspondence, including, but not limited to, letters, printed matter, and like materials; mailable packages; or other services incidental thereto." Order No. 1449 at 4. This definition is the modern definition of a postal service, and the Commission should apply this definition in resolving the issues in this case.

The plain language of this definition compels the conclusion that stamped stationery, or stamped letter sheets, is a postal service. Stamped stationery is a service incidental to the receipt, transmission, and delivery by the Postal Service of correspondence, including letters. Below the postage stamp or indicia, the *The Art of Disney: Friendship* stamped stationery has a graphically identifiable space for the name and address of the recipient. Complaint at 1–2, ¶ 5. The reverse side of each sheet includes lines for writing a letter or message. *Id.* Each sheet is designed to be folded, sealed, and mailed. *Id.*

The Postal Service's own advertising for stamped stationery proves that the stamped stationery is a service incidental to the receipt, transmission, and delivery by the Postal Service of correspondence, including letters. According to the Postal Service, stamped stationery is "making it easy to write home" and "will make it even easier to keep in touch with friends." USPS Stamp Release #04-038.¹⁰ The sample message in the illustration in *Postal Bulletin* includes the

¹⁰ <http://www.usps.com/communications/news/stamps/2004.htm>

following sentences in a letter on stamped stationery from a hypothetical child named Scott to “Grandma”: “Do you like my new paper? I got it at the Post Office yesterday so I could write you a letter.” *Postal Bulletin* 22129 (5-27-04) at 34. In the *USA Philatelic* catalog, the Postal Service advertises, “Add more character to your mail with the pre-stamped stationery. Plug in your message and address, then just fold, seal and mail. It’s fun and easy, especially for kids.” *USA Philatelic*, Summer 2004, Vol. 9 No. 2; Exhibit 1.

The Postal Service’s own motion states that it offered the Disney stationery to encourage children “to sit down, take out their pens, and engage in good old-fashioned letter writing.” Motion at 4.

By the Postal Service’s own admission, the new stamped stationery is a service designed to encourage and enable the public to write letters. Under the Commission’s definition, a service that makes it “easy to write home” and “even easier” to keep in touch with friends through letter writing is a service incidental to the receipt, transmission, and delivery by the Postal Service of correspondence, including letters.

Moreover, if stamped cards and stamped envelopes are postal services, the new stamped stationery, or stamped letter sheets, must be postal services, too, because they serve similar functions in enabling the public to send correspondence. In the Docket No. R97-1 omnibus rate case, without any suggestion that stamped cards and stamped envelopes were not postal services subject to Commission jurisdiction, the Postal Service explained how stamped cards and stamped envelopes enable customers to send correspondence and letters. Witness Needham testified that stamped cards¹¹ provide individual customers “the stationery to send out correspondence immediately. Postal card users can purchase postal cards at a post office, prepare a message, address the card, and enter the card in the mailstream in the same visit.” Docket No.

¹¹ Witness Needham’s testimony used the terms “postal card” and “stamped card” interchangeably. The terms refer to the same product, which the Postal Service renamed “stamped card” in Docket No. MC96-3.

R97-1, USPS-T-39 at 109–10. Witness Needham also testified that stamped cards save customers “the labor and hassle of stamping the cards.” USPS-T-39 at 105 (quoting *WordPerfect, The Magazine*). In the process, customers purchase their postage in a single transaction, as opposed to one transaction to purchase a card and a second transaction to purchase the postage. Witness Needham even urged the Commission to apply criterion 9 to the “affixation value” of stamped cards. According to witness Needham, “[p]re-affixation of postage on stationery at the time of purchase saves time, and therefore money, for postal card users.” USPS-T-39 at 113. She argued that all customers derive benefit from pre-affixation. *Id.*

Witness Needham carefully described how stamped cards provide a service incidental to the receipt, transmission, or delivery of correspondence. That is, stamped cards provide a greater service than plain, privately purchased post cards because customers can buy the card and postage in one transaction, and every customer benefits from pre-affixed postage. Stamped stationery, or stamped letter sheets, provides the same services incidental to the receipt, transmission, or delivery of correspondence as stamped cards do. Customers can buy the paper and postage in one transaction, and every customer benefits from pre-affixed postage. Moreover, letter sheets save the customer the need to buy an envelope, which potentially could require yet another separate transaction.

Witness Needham asserted that stamped envelopes provide a “high value of service to customers[.]” USPS-T-39 at 96. She testified that stamped envelopes “are convenient to use, particularly for those individuals needing to mail something who need ready access to postage and an envelope.” Once again, stamped envelopes provide a service incidental to the receipt, transmission, or delivery of correspondence, including letters. Stamped stationery, or stamped letter sheets, provides the same service incidental to the receipt, transmission, or delivery of correspondence, including letters, as stamped envelopes do. Stamped stationery accommodates individuals who need to write a letter and need ready access to postage. Stamped stationery

takes the convenience, or service, one step further than stamped envelopes by enabling a customer to write a private, sealed letter without purchasing an envelope.

The Postal Service admits that the pre-affixed postage on the stamped stationery, or stamped letter sheets, is significant. This admission appears when the Postal Service warns that Commission regulation of the fee for stamped stationery could cause the Postal Service instead “to sell unstamped stationery with a packet of stamps included, which would decrease customer convenience[.]” Motion at 5. A service that increases the convenience of sending correspondence, including letters, is a postal service.

Surprisingly, the Postal Service argues that “the fact that the Postal Service may encourage buyers of the stamped stationery to use them to write letters has no bearing on the issue of Commission jurisdiction” [footnote omitted]. Motion at 5. The Postal Service argues that it “also sells packaging supplies, presumably for the purpose of encouraging and making it easier for customers to send packages. The Commission does not exercise jurisdiction over the offering of such supplies.” *Id.*

Packaging supplies, like plain envelopes and post cards, lack the value of pre-affixed postage that witness Needham described in detail for stamped cards and stamped envelopes. Stamped cards, stamped envelopes, and stamped stationery are postal services because they provide additional *services* — the pre-affixed postage — relating to receipt, transmission, and delivery of correspondence. Absent the extra value of the pre-affixed postage, these items would be ordinary products, not postal services.

The Postal Service’s comment about packaging supplies raises an interesting observation. On December 29, 2003, the Postal Service started selling Priority Mail flat-rate envelopes preprinted with postage. *Postal Bulletin* 22119 (1-8-04) at 3. At its on-line store,¹² the Postal Service advertises that “the

¹² www.stampsonline.com / Browse Store / Mailing Products / Prepaid Envelopes and Cards

prepaid version of the envelope seeks to further customer convenience by saving time and enabling an even more simplified transaction.” If the Postal Service someday sought to charge customers a separate fee for these stamped envelopes, these envelopes would be postal services subject to Commission jurisdiction for the same reason that other stamped envelopes are.¹³

Also, in 1976, the Commission decided not to assert jurisdiction over packing materials, stamp affixers, and related items because the Postal Service was not the exclusive provider of these items. PRC Op. R76-1, Appendix F at 20–21. In contrast, the Postal Service *is* the exclusive provider of stamped stationery (stamped letter sheets). Public policy favors regulating a service that a government monopoly provides exclusively.

The Postal Service seems to be arguing its position by identifying other items, such as packaging supplies and “philatelic items,” that are not subject to Commission jurisdiction. Conspicuously absent from the Postal Service’s motion, however, is an explanation confronting the central issue and explaining how and why stamped stationery is not a postal service. This legal question is the crux of this case, and the Postal Service barely mentions the term “postal service.” Instead, to undermine my comparisons between stamped stationery and stamped envelopes, the Postal Service would like the Commission to second-guess its decision to regulate the fee for stamped envelopes.

In 1976, as the Postal Service notes, the Commission stated that it remained “arguable that the service is essentially a sale of stationery and is not a strictly postal operation.” PRC Op. R76-1, Appendix F at 16. The Commission’s statement that stamped envelopes are not a “strictly postal operation” suggests a definition of a postal service that differs markedly from the one the Commission adopted in 2006. For this reason alone, this quote is inapposite. However, the Commission would be unlikely to have reached this conclusion in 1976 if the record had included witness Needham’s explanation of how stamped envelopes

¹³ The Priority Mail flat-rate envelopes with postage pre-affixed arguably already are a postal service, and a classification, subject to Commission jurisdiction, even if no fee is charged.

enable customers to send correspondence, including letters. The language quoted from 1976 is 30 years old. With the additional evidence the Commission has received since 1976 and the new definition of a postal service that the Commission has developed, the quotation from 1976 should be afforded little weight in resolving the issues in this complaint.

Notwithstanding the other reasons to afford the Commission's statement from 1976 little weight, if there were ever an instance in which the legal principle of *stare decisis* should guide the Commission, this case is it. In 1976, the Commission invited evidence on the question of jurisdiction over stamped envelopes in future proceedings. *Id.* at 17. I found no indication that the Postal Service challenged the Commission's jurisdiction in subsequent proceedings, and the Commission has regulated the fee for stamped envelopes for 30 years since. The Commission has regulated the fee for stamped cards since 1997; prior to 1997, no fee existed. Not only has the Postal Service not challenged the Commission's jurisdiction over these services, but the Postal Service also essentially *sought* the Commission's jurisdiction when it proposed a fee for stamped cards in Docket No. MC96-3. This legal issue is settled: Stamped cards and stamped envelopes are postal services. Bearing substantial similarity to stamped cards and stamped envelopes, stamped stationery, or stamped letter sheets, is a postal service as well.

IV. WHETHER STAMPED STATIONERY IS A "PHILATELIC ITEM" IS IRRELEVANT

The Postal Reorganization Act authorizes the Postal Service to provide philatelic services. 39 U.S.C. § 404(a)(5). The statute says nothing about philatelic products or philatelic items. The Postal Service argues that the Commission "therefore does not assert authority over the sale of philatelic items on its understanding that 'providing philatelic services is not so closely related to the carriage of mail that it can be considered a special postal service within the meaning of § 3622.'" Motion at 1 (quoting PRC Op. R76-1, Appendix F at 20).

After laying what it believes is the groundwork to exempt the fee for philatelic items from Commission jurisdiction, the Postal Service then proceeds to argue that the Disney stationery is “intended to be a philatelic item[.]” Motion at 1. Postal Service intent is irrelevant. Whatever else one calls it, if stamped stationery is a postal service, the Postal Service was required under 39 U.S.C. §§ 3621, 3622(a), and 3623(b) to request a recommended decision from the Commission before setting a rate or fee for stamped stationery, establishing a new classification for stamped stationery, or selling stamped stationery. Moreover, under 39 U.S.C. § 3621, postal rates and fees shall be reasonable and equitable.

The Postal Service’s assertion that the stamped stationery is a “philatelic item” is distracting not only because it is irrelevant to the central legal question in this case — whether stamped stationery is a postal service — but also because the term lacks a clear definition. Even more problematic is the Postal Service’s suggestion of mutual exclusivity — that is, if an item is a philatelic item, it cannot also be a postal service.

The Postal Service explains why the Disney stationery has philatelic value. See Motion at 2. The Postal Service fails to acknowledge, however, that every piece of postal stationery that the Postal Service issues has philatelic value. Some stamp collectors collect every item of postal stationery that the Postal Service issues, including stamped cards, stamped envelopes, aerogrammes, and stamped letter sheets from the 19th century. These items have philatelic value to these collectors because they want a complete collection. Other people value especially attractive designs of stamped envelopes and stamped cards, and they may buy and collect selected items. Modern Postal Service stamped-card designs are, in my opinion, quite attractive and surely have philatelic value. Stamped cards, by the Postal Service’s definition, are philatelic items just as much as stamped stationery is. Trying to define a philatelic item in a legally meaningful way would be an exercise in futility because it would be hard to identify any postage item that the Postal Service produces that would not have philatelic value. However, the exact definition of a philatelic

item is irrelevant because the legal question is whether stamped stationery is a postal service.

Many items that the Postal Service would describe as philatelic items clearly are not postal services, and therefore they are not subject to Commission jurisdiction. A visit to the Stamp Products link at www.stampsonline.com reveals the wide variety of philatelic items that the Postal Service sells. These philatelic items include keychains, mugs, calendars, pens, mouse pads, notepads, lapel pins, magnets, books, teddy bears, and artwork. These items are not subject to Commission jurisdiction because they are not *postal services*. If the Commission rules that stamped stationery is a postal service, neither the Postal Service nor the Commission would have any reason to fear that the Commission would quickly become enmeshed in regulating the prices of keychains and mouse pads. Nearly every philatelic product that the Postal Service sells that is not regulated by the Commission is not a postal service. Nothing would change. The stamped stationery, however, crossed a critical line, and as such, it is a postal service subject to Commission jurisdiction.

V. THE FEE FOR STAMPED STATIONERY MUST NOT CONSIDER THE PHILATELIC VALUE OF THE PRODUCTS THAT FACILITATE THE SERVICE.

The Postal Service argues that the Commission, if it set a fee for stamped stationery, would need to discern the artistic and design value of products. Motion at 2. In reality, the philatelic and design value of stamped stationery would be completely irrelevant to the fee for the service. Instead, the Commission may consider only the factors identified in 39 U.S.C. § 3622(b). These factors would include the value of the mail *service*. For example, the Commission would consider the convenience and overall value of a sheet of stamped stationery compared to a stamped card. The Commission never considers the philatelic value of stamped envelopes or stamped cards — even though these products certainly have philatelic value. Nor should the Commission consider the philatelic value of stamped stationery, as much as the Postal Service would like to imagine the Commission's reaction to the need to

referee a battle between opposing art and design professors in a rate-setting proceeding.

The Postal Service attempts to distinguish the current stamped stationery from aerogrammes by arguing that aerogrammes are utilitarian. Motion at 3. The Postal Service also attempts to dismiss stamped envelopes as “utilitarian.” *Id.* at 2. This distinction is a false one because the relevant legal question is whether stamped stationery, or stamped letter sheets, is a postal service. An attractively designed product that implements a postal service is a postal service just as much as a blandly designed, or “utilitarian,” product that implements a postal service. If the Postal Service issued a stamped card or stamped envelope with a Disney logo on it, would the Postal Service be free to call the item a philatelic item, ignore the approved fees for stamped cards and stamped envelopes, and sell the item for whichever price it wanted? Of course not. The Commission has never considered the design of a product in setting the fee for a postal service. Attractive stamped cards pay the same fee as less-attractive, or “utilitarian,” stamped cards.

After the Postal Service began producing hologram stamped envelopes in the 1990’s, the Postal Service did not seek approval for a higher fee to reflect the philatelic value of these designs. Rather, the Postal Service obtained a Commission recommendation for a fee of eight cents for single-sale hologram stamped envelopes, instead of the seven-cent fee for plain stamped envelopes, to reflect the increased manufacturing costs. See Docket No. R97-1, USPS-T-39 at 92 and 96 and USPS-LR-H-107.

To the extent that licensing fees and other design expenses drove up the cost of the Disney stationery, the Postal Service would be entitled to recover the manufacturing costs of the stationery, just as the Postal Service is permitted to recover the manufacturing costs of stamped cards and stamped envelopes.

VI. THE POSTAL SERVICE UNJUSTIFIABLY DISMISSES THE CONCERNS OF STAMP COLLECTORS

In my complaint, I cited the concerns of stamp collectors over the Disney stationery, which the Postal Service sells at a huge premium — a whopping 87.6 cents for each sheet. Complaint at 4, ¶ 29; *Id.* at 5, ¶¶ 34–37. I argued that this excessive fee unreasonably discriminated against stamp collectors and failed to consider the effect of rate increases on the general public. *Id.*, ¶¶ 34 and 37.

Eager to characterize stamped stationery as merely a philatelic item, the Postal Service jumps on this allegation and then trivializes it by suggesting that I “may feel compelled” to buy the stationery, not to mail it but instead to complete my philatelic collection. Motion at 4. First, the Postal Service knows nothing about my philatelic collection, to the extent that I have one, and should not suggest that it does. Second, when the Postal Service produces a product that facilitates use of a postal service and then illegally charges an exorbitant, unapproved fee for the product, the Postal Service most certainly discriminates against stamp collectors if the product is priced so high that stamp collectors will be the main group of people likely to purchase it. The intent of some purchasers is irrelevant to the appropriate level of the fee or the existence of discrimination. If the Postal Service printed and sold a stamped card for an unapproved fee of 20 cents instead of two cents, all customers who purchased this card for 20 cents would be harmed, regardless of whether they planned to mail it or save it. The statute does not permit the Postal Service to price services based on the purchaser’s intent. Rather, the statute requires the Postal Service and the Commission to evaluate the value of the postal service itself, as well as other statutory criteria. All customers are protected equally under the law against discrimination and against the sale of postal services at unapproved fees.

The Postal Service also asserts that Commission regulation over the Disney stationery “might ultimately result in a diminution of philatelic choices.” My complaint included an editorial from *Linn’s Stamp News* bitterly criticizing the price of the Disney stationery. Complaint at Exhibit 2. I highly doubt that stamp collectors would bemoan the reduction in what they perceive as overpriced products designed to lighten their wallets.

The Postal Service also suggests that the “prospect of the need for Commission proceedings in advance of the issuance of stamped stationery could have an unintended, but real, chilling effect on the process, including negotiating with licensors and the timing of production, such that no future issuances might be able to occur.” Motion at 4–5. This assertion is pure speculation with no evidentiary support. Where there is a will, there is a way. Moreover, without any evidence on the production costs of stamped stationery and the proportion that is attributable to licensing, we do not know whether licensing would have a significant effect on the ultimate cost per sheet. That is, an increase in licensing costs might not result in a whole-cent increment in the ultimate fee for the stamped stationery. Also, future stamped stationery might not use artwork that required licensing. The Garden Bouquet stamped stationery, which is based on the design of the 37-cent Garden Flowers stamps, used Postal Service designs and presumably did not require licensing.

If the Postal Service is correct about the negative consequences of Commission regulation of the fee for stamped stationery, the solution is to change the law, not to flaunt it. The Postal Service has raised similar arguments about the lack of flexibility inherent in other aspects of the current law, and Congress is considering changes. Twisting the current law to claim that stamped stationery is not a postal service is not the correct solution to this perceived problem.

The Postal Service’s speculation about lost flexibility is a classic scare tactic by an agency seeking to avoid regulation. The real danger is in allowing the Postal Service to continue to provide postal services at unregulated fees. The bitter editorial in *Linn’s Stamp News* underscores this point.

VII. CONCLUSION

The Commission’s definition of a postal service, as well as a comparison to stamped cards, stamped envelopes, and aerogrammes, compels the conclusion that stamped stationery is a postal service. Fees for postal services must be consistent with pricing criteria specified in the statute. The law protects

the public against postal services priced many times above cost and the circumvention of the normal rate-setting process. The price of the stamped stationery that the Postal Service is selling — at a premium of 87.6 cents per sheet — should fully illustrate the consequences of allowing the Postal Service to set a fee for this postal service without Commission approval. The Commission should step in and issue a recommended decision establishing a classification and a fee for stamped stationery that are consistent with the policies of the Postal Reorganization Act. In the alternative, pursuant to 39 U.S.C. § 3623(b), the Commission should submit, on its own initiative, a recommended decision that recommends a new classification for stamped stationery.

Respectfully submitted,

Dated: January 24, 2006

DOUGLAS F. CARLSON

APPENDIX 1

TO OPEN, TEAR OFF THE ENDS.

IF NOT CALLED FOR
IN TEN DAYS,
POSTMASTER WILL PLEASE
RETURN TO



UNITED STATES

EMERALD SIDE MAN

ENVELOPE



TO OPEN, TEAR OFF THE ENDS.

U. S. PATENT, JULY 1, 1870.

