

POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-001

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Postal Rate and Fee Changes, 2006

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Docket No. R2006-1

DIRECT TESTIMONY OF  
ANDREA SUE LISS  
On behalf of  
GREETING CARD ASSOCIATION

September 6, 2006

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## **List of Exhibits**

Exhibit 1 – GCA-T-4-A - Annual LOUIE Awards Competition Entry Result/Comparisons

Exhibit 2 – GCA-T-4-B - Square Finalists and Winners in the LOUIE Awards  
Competition

## Executive Summary

My testimony is an analysis of the square shaped mailing piece from the perspective of standard design principles and consumer appeal. My opinions are based on my more than 20 years of experience as a graphic designer of printed materials, most of which have ended up in the mail stream – from direct mail catalogs and brochures to greeting cards and wedding invitations.

Regardless of the end use of the piece being produced, designers begin their process with a concept, and use a variety of creative elements to bring their concept to life; the most basic of these are shape and size. A primary factor in determining the shape and size of a finished piece is how best to break through the clutter and get noticed. Because a square size is not the standard, designers find it to be an effective tool in helping their designs to stand out from the crowd of bills and direct mail pieces in the mailbox.

In my own work, designing for a wide range of clients, I have found that the square shape has strong consumer appeal. Be it in my showroom with individual clients, or when I make a presentation to a corporation or institution, clients often gravitate to the square. In addition to its uniqueness, the square has a basic appeal to people beyond what they might put into words, as evidenced by its use in art and architecture throughout history.

It is my belief, based on my experience with clients, greeting card industry trends, and the square's historic and symbolic appeal, that if more square-shaped mailing pieces were available on the market, I would expect that more of such pieces would be noticed for their novelty, picked up by consumers, purchased, and mailed. An important

1 factor in this sales cycle and addition to the mail stream, however, is that the surcharge  
2 on this shape not be excessive. At present, though designers and consumers are  
3 attracted to the square proportion, the extra postal surcharge presents a hindrance to its  
4 growth. Consumers want to break through the clutter, but many are unwilling to pay the  
5 excess premium in order to do so. While clients hesitate now, with some deciding to  
6 forge ahead and pay the 13-cent surcharge, they may not do so if it increases to  
7 20-cents.



1 Show for the last 16 years, and have exhibited my work each of those years with the  
2 exception of one (1992). My greeting card line has been distributed in bookstores,  
3 boutiques, card shops, galleries, museum shops and department stores nationwide  
4 including Neiman Marcus, The Art Institute of Chicago, The Field Museum of Chicago,  
5 The Arthur M. Sackler Gallery at the Smithsonian Institution, Borders, Barnes & Noble  
6 and Papyrus.

7 My work has evolved into the creation of custom invitations and social stationery  
8 which are known for their fine craftsmanship, originality, innovation and style. My client  
9 roster includes The John F. Kennedy Center for the Performing Arts, The National  
10 Symphony Orchestra, NASCAR, The National Geographic Society, Intercontinental  
11 Hotels, Hilton Hotels Corporation, Jones Lang LaSalle, The Tourist Office of Spain, Kohl  
12 Children's Museum and Juanita and Michael Jordan.

13 In addition to my work with clients, I have been active in the greeting card and  
14 stationery industry. I served on the Board of Directors of the Greeting Card Association  
15 (GCA) from 2002-2005 and was Chairman of the 14<sup>th</sup> Annual LOUIE Awards. The  
16 LOUIE Awards are the top honor in the greeting card industry, and recognize excellence  
17 in creativity and design. I have served on the LOUIE judging committee and as a LOUIE  
18 Award presenter and worked with the GCA to create the Esther Howland Award, which  
19 honors visionaries in the greeting card industry

20 My peers have recognized my work as among the best in the industry. My  
21 company has been nominated for 42 LOUIE Awards and has won 10 of the prestigious  
22 awards, including Card of the Year, Best Invitation and First Runner-up for Card of the  
23 Year. I have also received two Gala Award nominations for Best Invitation by *Special*

1 *Events Magazine*, a Silver Award from the Foil Stamping and Embossing Association  
2 for Best Announcement/Invitation, and a Certificate of Excellence from the International  
3 Engraved Graphics Association in the Holiday and Greeting Card Category.

4 My professional affiliations include membership in the American Institute of  
5 Graphic Arts (AIGA), the Graphic Artists Guild, and the Greeting Card Association.

1 **I. Purpose and Scope of Testimony**

2 I have been asked by the Greeting Card Association to offer my opinion on the  
3 use of the square shape in the design of greeting cards, social stationery, and other  
4 printed mailing pieces as well as to comment on its appeal to consumers. I have also  
5 been asked to offer an opinion on the proposed new treatment of square letter-size  
6 mailing pieces under which they would pay the rate for flats, thereby incurring an  
7 additional surcharge – raised from 13- to 20-cents – and its likely impact on consumers’  
8 mailing habits should this surcharge take effect.

9 In order to answer these questions, I will begin by putting the square shape into  
10 context with the other elements of graphic design, as well as by offering some insight  
11 into the history, symbolism and aesthetic appeal of the square throughout time, across  
12 cultures and in today’s information-filled environment. I will then draw upon my  
13 experience as a graphic designer and manufacturer, as well as a provider of mailing  
14 services, to offer my thoughts on the consumer appeal of the square shaped mailing  
15 piece as well as consumer reaction to the current postal surcharge of 13-cents. I will  
16 also offer my observations on trends in the greeting card and stationery industry  
17 regarding the square shape, and its availability and popularity with consumers and  
18 industry leaders as well as my thoughts on the proposed rate treatment of square letters  
19 as flats, thereby increasing the surcharge to 20-cents.

## II. Basic Elements of Graphic Design

1  
2 In order to put the square shape into proper context, I will provide a definition and  
3 brief overview of the primary elements of graphic design. These elements are the  
4 building blocks that designers use to transform an empty space into a medium of visual  
5 communication. U.S. typographer and book designer William Addison Dwiggins first  
6 used the term graphic design in 1922.<sup>1</sup> Graphic design is the process of selecting and  
7 arranging components such as typography, photographs, illustrations, logos, motifs,  
8 colors, and white space in a pleasing manner thereby delivering a message to an  
9 audience. This message is conveyed both visually by the look and feel of the printed  
10 piece, and verbally by the written content. Graphic designers leave their mark on a wide  
11 range of objects, including books, magazines, product packaging, advertisements,  
12 posters, annual reports, direct mail catalogs, billing statements, compact disc covers,  
13 postcards, greeting cards, invitations and postage stamps. Sometimes the designer is  
14 creating materials that are meant as a call to action – for example, direct mail pieces  
15 that are used to inspire a visit to a local store or to build traffic on a website – while  
16 other designs are an end in themselves and result in a finished product, such as a  
17 bookmark, calendar, or greeting card.

18 Regardless of the intended use of the finished piece, the design process begins  
19 the same: with a concept. This is the idea and the foundation of all further activity. A  
20 good concept is based on the identity and image of the client or business, the subject  
21 matter and purpose of the piece to be created, and the message it is to convey.

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<sup>1</sup> "Graphic Design." Encyclopedia Britannica (2006) <http://britannica.com/eb/article-9343803>

1 Designers look for concepts that will communicate the essence of their message to their  
2 target audience in a meaningful way. The idea is to make a connection, spark an idea,  
3 inspire an emotion, provide a call to action.

4         Once a concept has been developed, graphic designers must work with both  
5 creative and practical concerns to solve the puzzle of communicating this concept to its  
6 intended audience. They use a variety of creative elements to bring the concept to life:  
7 size, shape, format, balance, symmetry, line, typography, texture, value, contrast, and  
8 color all come into play. In print communication, designers must also concern  
9 themselves with practical elements such as paper and envelope selections, ink color,  
10 printing and finishing processes, bindery and mailing options. First and foremost in the  
11 design process are the elements of shape and size, and as these are the components  
12 that are relevant to the matter at hand, they are the ones that I will concern myself with  
13 here.

### 14                                 **III. Designing with Regard to Shape and Size**

15         Shape and size are the foundation of any design project and can be used to  
16 sustain interest, communicate an idea, or as design elements all by themselves. Before  
17 a layout begins, the designer must determine what shape and size are best suited to the  
18 concept and information to be communicated. A primary factor in determining these  
19 parameters is how best to break through the clutter and get noticed. Because a square  
20 size is not the standard, designers find it to be an effective tool in helping their designs  
21 to stand out from the crowd of bills and direct mail pieces in the mailbox. Designer and  
22 educator, David Lauer describes it this way, “Unity with variety does create a pleasant  
23 visual sensation. The general public uses this principle as a critical basis on looking at

1 art, despite the fact that many people have never heard of or read the phrase.”<sup>2</sup> In a  
2 sea of rectangular envelopes, the square shape is different, visually pleasing, and  
3 provides an unexpected element of surprise – it gets noticed.

4         Indeed, when designing mailing pieces, envelope size is often the first and most  
5 basic concern. As most clients would prefer to avoid the cost of creating custom  
6 envelopes, designers look to standard-sized envelopes as one place to begin their size  
7 and shape development. It has been my observation that over the last five years, the  
8 number and variety of square shaped envelopes has increased, as has the demand  
9 from clients for square formats. I believe that one important reason is that the novelty of  
10 the square, non-rectangular mailing piece attracts attention, interest, and sets it apart. It  
11 stands out from the rest, and therefore has desirability in the marketplace. Designers,  
12 consumers, and clients all find it appealing.

13         In addition to creating a design with visual and market appeal, a good designer  
14 will also concern himself with what happens to his designs after they leave his hands.  
15 Postal requirements such as shape, size and weight as well as postal rates need to be  
16 taken into account early in the design process to avoid unnecessary surprises later on.  
17 Experienced designers will make it a point to make their clients aware of any special  
18 fees or restrictions from the US Postal Service. For example, when working with my  
19 clients, I advise them of the current surcharge on square envelopes so that they can  
20 make an informed decision when purchasing their invitations. If the item being  
21 designed is meant for resale, the designer must keep this in mind, and may find it

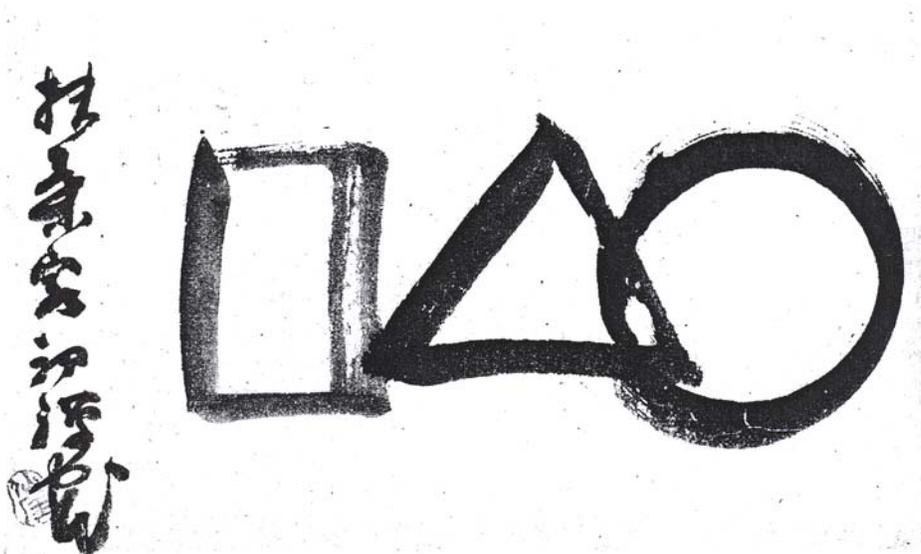
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<sup>2</sup> Lauer, David A., Design Basics, Holt, Rinehart and Winston, Inc. (1979), p.19

1 prudent to print *Extra Postage Required* text in the upper right hand corner of the  
2 envelope to alert consumers to the surcharge.

### 3 **IV. History and Symbolism of the Square**

4 In addition to its uniqueness as a design element, the square has a basic appeal  
5 to people beyond what they might put into words, as evidenced by its use in art and  
6 architecture throughout history. Indeed, there are certain basic shapes that have been  
7 found across time and cultures, and these proportions recur in art, architecture and  
8 nature. The most basic of these shapes are the circle, triangle, and square.



9

10 *Zen calligraphic drawing of square, triangle and circle.*<sup>3</sup>

11 One of North America's most highly regarded typographers and book designers,  
12 Robert Bringhurst, describes the phenomena this way, "Scribes and typographers, like  
13 architects, have been shaping visual spaces for thousands of years. Certain

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<sup>3</sup> Sengai, Japan, circa 1830, Mitsu Art Gallery, Tokyo, Photo Arts Council of Great Britain, published in Lawlor, Robert, Sacred Geometry, London: Thames & Hudson (1982), p. 13

1 proportions keep recurring in their work because they please the eye and the mind, just  
2 as certain sizes keep recurring because they are comfortable to the hand. Many of  
3 these proportions are inherent in simple geometric figures – equilateral triangle, square,  
4 regular pentagon, hexagon and octagon. And these proportions not only seem to please  
5 human beings in many different centuries and countries, they are also prominent in  
6 nature far beyond the human realm. They occur in the structures of molecules, mineral  
7 crystals, soap bubbles, flowers, as well as books and temples, manuscripts and  
8 mosques.”<sup>4</sup>

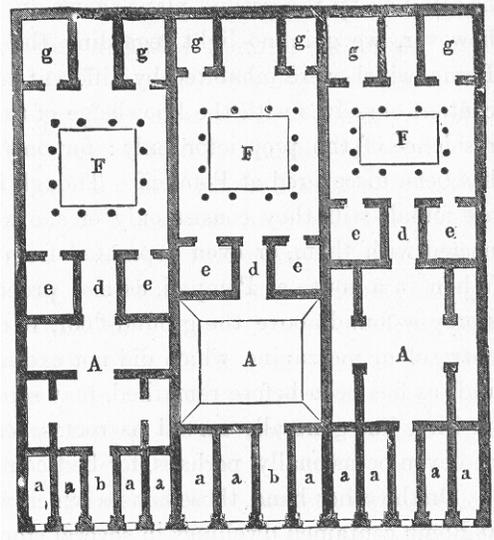
9         A study of the human psyche may offer additional insight into the appeal of the  
10 square shape, as Carl Jung, the famed Swiss psychologist, psychiatrist, and founder of  
11 analytic psychology, wrote, “The frequency with which the square and the circle appear  
12 must not be overlooked. There seems to be an uninterpreted psychic urge to bring into  
13 consciousness the basic factors of life that they symbolize.”<sup>5</sup>

14         In fact, the square shape has been used as a basis for the planning of cities,  
15 gardens, and courtyards since Roman times when buildings were based on the  
16 geometry of the square and its diagonal, the *ad quadratum*.

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<sup>4</sup> Bringhurst, Robert The Elements of Typographic Style version 3.1, Vancouver BC, Canada: Hartley & Marks (2005), p. 144

<sup>5</sup> Jung, Carl G., Man and his Symbols, Garden City, NY: Doubleday & Company, Inc. (1964), p. 249



1

2

*Ground plan of three Roman dwelling houses<sup>6</sup>*

3

Roman architect and engineer Vitruvius, author of the oldest surviving book on

4

the subject wrote, "Without symmetry and proportion there can be no principles in the

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design of any temple; that is, if there is no precise relation between its members, as in

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the case of those of a well shaped man."<sup>7</sup> And continues, "For if a man be placed flat on

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his back, with his hands and feet extended, and a pair of compasses centered at his

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navel, the fingers and toes of his two hands and feet will touch the circumference of a

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circle described there from. And just as the human body yields a circular outline, so too

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a square figure may be found from it. For if we measure the distance from the soles of

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the feet to the top of the head, and then apply that measure to the outstretched arms,

12

the breadth will be found to be the same as the height, as in the case of plane surfaces

13

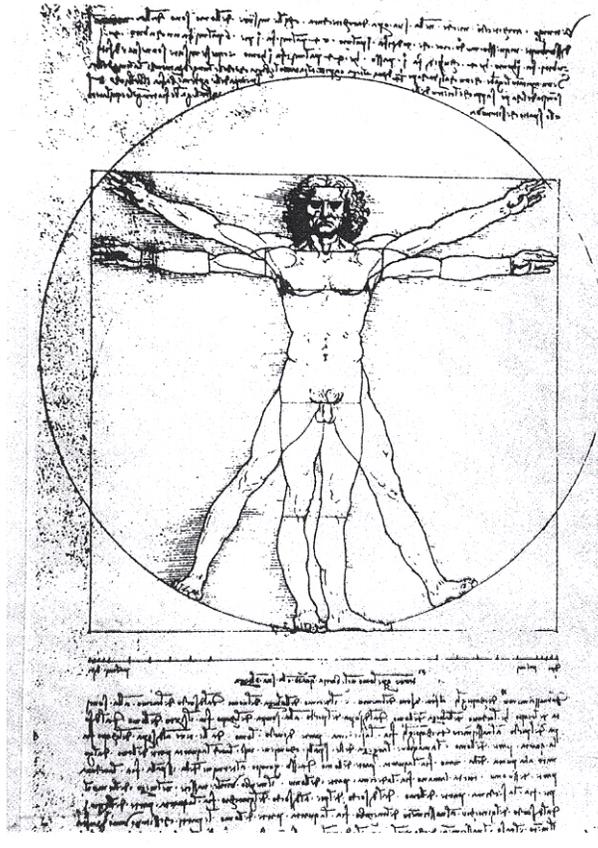
which are perfectly square. Therefore, since nature has designed the human body so

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<sup>6</sup> Rosengarten, A., translated by W. Collett-Sandars, *A Handbook of Architectural Styles*, New York: Charles Scribner's Sons, (1927), p. 145

<sup>7</sup> Pollio, Marcus Vitruvius, translated by Morris Hicky Morgan, *The Ten Books on Architecture*. NY: Dover, (1960), Book III, Chapter 1, p. 72

1 that its members are duly proportioned to the frame as a whole, it appears that the  
2 ancients had good reasons for their rule, that in perfect buildings the different members  
3 must be in exact symmetrical relations to the whole scheme."<sup>8</sup>



4

5 *Leonardo da Vinci's Vitruvian Man.*<sup>9</sup>

6 In addition to architects, the square has inspired philosophers, artists and writers  
7 as well. Plato regarded the square as being absolutely beautiful in itself, and Leonardo  
8 da Vinci's famous drawing *Vitruvian Man*, inspired by Vitruvius' writings, illustrates a

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<sup>8</sup> Ibid, p. 73

<sup>9</sup> da Vinci, Leonardo, *Vitruvian Man*, published in Hargittai, István and Hargittai, Magdolna, Symmetry: A Unified Concept, Bolinas, California: Shelter Publications, Inc. (1994), p. 5

1 man inside a circle inside a square and highlights the symmetrical proportions of the  
2 human body.

3 Perhaps the square's appeal to designers and consumers is as basic as its  
4 traditional symbolic meanings: honesty, straightforwardness, integrity, dependability,  
5 morality, security, solidarity, safety, shelter, permanence, stability, and balanced  
6 perfection of form.<sup>10</sup>

## 7 **V. Consumer Appeal of the Square**

8 In my own work, designing for a wide range of clients, I have found that the  
9 square shape has strong consumer appeal. Be it in my showroom with individual  
10 clients, or when I make a presentation to a corporation or institution, clients often  
11 gravitate to the square and select the square shape from many options presented to  
12 them.

13 I also have experience working with clients who, while voicing a preference for  
14 the unusual shape, decide to opt out of a square design in order to avoid paying the  
15 higher postal rate associated with this size, or are forced to make other adjustments to  
16 their projects in order to remain within budget while utilizing the square format.

17 Based on the popularity of the square shape with my clients, it is my belief that if  
18 a square shaped card were available to more people without a surcharge to mail, I  
19 would expect that more of these cards would be noticed for their novelty and inherent

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<sup>10</sup> Cooper, J.C., An Illustrated Encyclopedia of Traditional Symbols, London: Thames and Hudson Ltd. (1978), pp. 157-158; Freiburg, Herder translated by Boris Matthews, The Herder Symbol Dictionary, Wilmette, Illinois: Chiron Publications (1986), pp. 179-180; Guiley, Rosemary Ellen, The Encyclopedia of Dreams, New York: The Crossroad Publishing Company (1993), p. 182; Fontana, David, The Secret Language of Symbols, San Francisco: Chronicle Books (1994), p. 54-59; Bruce-Mitford, Miranda, The Illustrated Book of Signs and Symbols, London: Dorling Kindersley Ltd. (1996), p. 104; Chevalier, Jean and Gheerbrant, Alain, translated by John Buchanan-Brown, A Dictionary of Symbols, Cambridge, Massachusetts: Basil Blackwell Inc. (1994), pp. 912-918

1 appeal, picked up by consumers, purchased, and mailed. An important factor in this  
2 sales cycle and addition to the mail stream, however, is that the surcharge on this  
3 shape not be excessive, or even better, if there were no surcharge to discourage  
4 designers and consumers from purchasing and mailing them.

## 5 **VI. Mailing and the “Non-Machineable” Surcharge**

6 As background, let me say that, regarding the invitation projects my company  
7 designs and produces, we usually go on to mail them for our clients. This means that  
8 we take a sample mailing piece to the post office where we have it weighed and  
9 purchase the postage for both the outer and reply envelopes on behalf of our clients.  
10 We then address the envelopes, stuff, seal, and stamp them and then return to the post  
11 office where we mail them.

12 I am aware of the US Postal Service’s proposed increase for square mailing  
13 pieces from 13- to 20-cents if square envelopes are charged as though they were  
14 classified as flats. While I cannot speak to whatever cost issues may be involved in the  
15 proposed increase, I believe that this additional surcharge will create an undesirable  
16 burden for the average consumer. It has been my experience that when informed of the  
17 surcharge, some clients decide to reduce the number of pieces they mail, or to select a  
18 more standard mailing size, which is not their first choice. They want to break through  
19 the clutter, but are unwilling to pay the excess premium in order to do so. I am  
20 concerned that by adding an additional surcharge through the new rate treatment of  
21 square shaped envelopes as if they were flats, the problem will be amplified. While  
22 clients hesitate now, but may decide to forge ahead with the 13-cent surcharge, they

1 may not do so if it becomes 20-cents. Just when we have created something that gets  
2 people excited about using the mail, we penalize them for using it.

3         The importance of keeping consumers, especially younger ones, involved and  
4 engaged with the process of purchasing and sending cards and invitations through the  
5 mail is something I deal with often. In my work with clients, especially young brides and  
6 grooms, it has been my experience that the younger people want to step away from  
7 tradition, and have their guests reply via e-mail. They talk about the savings in postage  
8 and the expense of printing the reply set as well as the ease of replying on-line. In my  
9 showroom, we guide them to use reply sets – which are mailed – for the sake of  
10 tradition as well as to be considerate of the needs of guests of all ages, some of whom  
11 may not be computer literate. I wonder, however, as time goes on and the next  
12 generation of grandparents is computer savvy, if we will lose these cards in the mail  
13 stream.

14         In addition, there is a trend towards using the computer to accomplish the task of  
15 inviting guests altogether. Inventive companies have developed websites and software  
16 programs to allow consumers to invite guests, keep track of guest lists and take their  
17 replies, thus cutting out our services and yours. I believe it will take innovation and  
18 responsiveness to consumer needs and wants in order to keep people interested in  
19 printed solutions that end up in the mail stream, and we need to be able to accomplish  
20 that as economically as possible.

## 21                                 **VII. Industry Design and Sales Trends**

22         For the past 16 years, I have attended the National Stationery Show and make it  
23 a point to walk every aisle of the show in order to keep abreast of what is happening in

1 the industry and to spot trends. I have been an exhibitor at the show for all but one of  
2 those years (1992). I have also sat on the judging committee for the industry's awards  
3 program, the LOUIE Awards, and have reviewed hundreds of cards in that capacity. I  
4 have observed a common thread running through the industry over time, which is the  
5 constant pursuit for what is *new*. Retail store owners, sales representatives, and  
6 consumers alike are all in pursuit of what is fresh and innovative. They are looking for  
7 something different to catch their eye, delight their senses, and make them smile.  
8 Greeting card and invitation designers work to fill that need, and one of the design tools  
9 they use is that of shape and size as described in section II above.

10 Industry professionals seem to agree on the desirability of the square format as  
11 evidenced by the number of awards and honors bestowed on square cards. From its  
12 beginning in 1988 to the present year of 2006, the number of finalists and winners of the  
13 LOUIE Awards competition that have been squares or fit into square envelopes has  
14 almost tripled.<sup>11</sup> I believe that this increase in peer recognition reflects the industry's  
15 commitment to product development of the square formatted greeting card; an increase  
16 fueled by a consumer desire for what is new and different. Companies include square  
17 products in their product lines because they sell, and it is my belief that if the postal  
18 treatment of square cards is at best facilitated, or at least not penalized by the postal  
19 rate structure, then I would expect more of these cards to be designed, sold and mailed.

## 20 **VIII. Conclusions**

21 In our time of ever-increasing choices in communication including cell phones, e-  
22 mail and text messaging, we as an industry need to focus our attention on remaining

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<sup>11</sup> Greeting Card Association, Exhibits 1 and 2

1 useful and relevant to the consumers we serve. We are very far from the era when,  
2 slow though it may have been, a letter was the only viable means of communication – a  
3 time well-described by postal historian Frank Staff, “When our countrymen left their  
4 native land in the early part of the seventeenth century to seek a new life in the North  
5 American Colonies, they did so fully aware that written communication with their loved  
6 ones and friends left behind would be uncertain and that many months–indeed, maybe  
7 a year–would elapse before answer could be expected to any letter that might find its  
8 way home.”<sup>12</sup>

9 Today we are able to communicate across the world in the blink of an eye, and  
10 as a collective industry we need to stand together, greeting card publishers and US  
11 Postal Service alike, to ensure that we remain relevant and in touch with the needs and  
12 wants of the consumers we serve. If their need for us to get their messages across the  
13 miles is growing less, we must ensure that they want us to do so even more – not  
14 because we can do it quicker, but because we do it better, with more meaning and heart  
15 than an electronic missive untouched by the human hand. Many of today’s consumers  
16 don’t need us for much of their day-to-day communication. We need to be something  
17 they desire, an experience that cannot be replicated by other available means of  
18 communication.

19 The idea of remaining useful and relevant to consumers is a basic marketing  
20 principle that widely-quoted Harvard Business School professor, Theodore Levitt, is well  
21 known for articulating, “The railroads did not stop growing because the need for  
22 passenger and freight transportation declined. That grew. The railroads are in trouble

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<sup>12</sup> Staff, Frank The Transatlantic Mail, Chatham, Great Britain: W. & J. Mackay & Co. Ltd. (1956), p.19

1 today not because the need was filled by others (cars, trucks, airplanes, even  
2 telephones) but because it was *not* filled by the railroads themselves. They let others  
3 take customers away from them because they assumed themselves to be in the railroad  
4 business rather than in the transportation business. The reason they defined their  
5 industry incorrectly was that they were railroad-oriented instead of transportation-  
6 oriented; they were product-oriented instead of customer-oriented.”<sup>13</sup>

7         One is left to wonder what the future of the railroads would have looked like had  
8 they expanded their paradigm to realize that they were in the transportation business.  
9 Let us not travel down that road; rather let us remain relevant and connected to the  
10 consumer and citizen mailer. If it is square envelopes that they desire today, and the  
11 ability to purchase and mail them economically, I believe it is important to listen to that  
12 voice. We should also remain open to their voices in the future, so that we continue to  
13 remain vital and relevant in the years to come.

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<sup>13</sup> Levitt, Theodore “Marketing Myopia” The Harvard Business Review, President and Fellows of Harvard College, (1960, 1975) p. 2.