

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Service Performance Measurement : Docket No. PI2008-1
Systems for Market Dominant Products :

COMMENTS OF THE GREETING CARD ASSOCIATION

Pursuant to the Commission's Orders No. 48 and No. 49, the Greeting Card Association (GCA) submits the following comments regarding the Postal Service report *Service Performance Measurement*, as filed in this docket. GCA's comments concern the EXFC system for measuring the service performance of domestic single-piece First-Class Letters and Flats.

I. Treatment of misaddressed pieces: clarification needed

The *Service Performance Measurement* reports states (p. 11) that in Presort First Class, only properly addressed and prepared mail will be counted for service measurement purposes, because "incorrectly addressed pieces and improperly prepared mail make it impossible in many cases to meet the service standard[.]" Because single-piece First Class is not subject to the address quality and preparation requirements that characterize Presort, GCA would not expect any similar exclusion for badly-addressed pieces. The report, however, is silent on this question. If, as we would surmise, the Postal Service intends that all pieces covered by the EXFC system be counted, regardless of address quality, it would be helpful if the report so stated.

II. Representativeness of the EXFC mailstream

At pp. 17-18, the *Service Performance Measurement* report states that

. . . EXFC mailpieces are designed to resemble the rest of the mailstream; pieces are hand- or machine-addressed, stamped or metered, and are of different colors, sizes, and weights. . . .

As the Commission may recall from Docket No. R2006-1¹, an important issue for greeting card users and the GCA members who supply them is the treatment of non-machinable, and especially square or other low-aspect-ratio, First-Class Letters. The overall intention expressed in the passage just quoted – that EXFC pieces “resemble the rest of the mailstream” – therefore implies that an appropriate proportion of them should be of non-standard aspect ratio. The list of variables, however, does not explicitly include non-standard shape. GCA believes that the square or near-square greeting card will continue to be an important – in all likelihood, an increasingly important – medium for personal communication. From the standpoint of its validity as a service performance measure, the EXFC mailstream should be designed to reflect this fact. GCA recommends that the Commission condition its approval of the report on a commitment that the EXFC mailstream will do so.

III. Expansion of EXFC

GCA applauds the decision of the Postal Service, reported at p. 18 of *Service Performance Measurement*, to expand EXFC to cover “nearly all” three-digit ZIP Code areas. This expansion will alleviate a long-standing concern that service in thinly-settled or other low-volume areas might not be adequately measured. The Commission should approve it.

Respectfully submitted,

GREETING CARD ASSOCIATION

¹ See, e.g., GCA-T-3 (Morrissey) and GCA-T-4 (Liss), and Initial Post-Hearing Brief of the Greeting Card Association, pp. 65 et seq.

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