

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Consideration of Workshare :
Discount Methodologies : Docket No. RM2009-3

INITIAL COMMENTS OF THE GREETING CARD ASSOCIATION

The Greeting Card Association (GCA) files these comments concerning the benchmark for First-Class Mail worksharing discounts pursuant to Order No. 192 (March 16, 2009). GCA has previously argued that the established Bulk Metered Mail (BMM) benchmark remains the correct choice.¹ GCA still believes this to be true. In this submission we discuss in more detail the reasons for our view.

Requested by the Commission, in the context of the 2009 rate adjustment, to justify its changed approach to constructing worksharing rates, the Postal Service outlined its reasons in *Response of the United States Postal Service to Chairman's Information Request No. 1* (February 20, 2009). Because this document appears to represent the Service's most recent formulation of its basis for shifting to a benchmark within Automation Letters (the Mixed AADC Letters level), we address it first.

I. The Postal Service's legal arguments

As presented in the response to CIR No. 1, the Service's argument is fundamentally a legal one, with two branches:

- Because Single-Piece and Presort are now separate products, any cost-reflecting relationship between them cannot be a worksharing relationship

¹ Docket No. R2009-2, *Comments of the Greeting Card Association*, pp. 2-3.

as that concept is used in 39 U.S.C. § 3622(e) – which provision, the Service argues, must be interpreted consistently with the workshare pass-through reporting requirements of § 3652(b); and

- Even if this is not so, departure from the BMM benchmark is justified because conforming to it would cause large perturbations in worksharing rates, which the Service may seek to avoid under an exception to the passthrough limitations of § 3622(e).

We deal first with the “separate products” argument.

The argument from the separate product status of Single-Piece and Presort. Here, the Postal Service appears to rely on two main points:

- Presort and Single-Piece are separate products and, in particular, exhibit both cost and demand differences; and
- Product status governs the application of § 3622(e), “because that provision must be read in a manner consistent with section 3652(b).”²

Taking the second point first, the evident first question is: What, if any, restrictions relevant to the benchmark problem does § 3652(b) place on the interpretation of § 3622(e)?

Effect of § 3652(b). Section 3652(b) requires, as part of the Service’s Annual Compliance Report,

. . . the following information with respect to each market-dominant product for which a workshare discount was in effect during the period covered by such report:

² Response of the United States Postal Service to Chairman’s Information Request No. 1 (February 20, 2009), p. 2 (“Response to CIR No. 1”).

(1) The per-item cost avoided by the Postal Service by virtue of such discount.

(2) The percentage of such per-item cost avoided that the per-item workshare discount represents.

(3) The per-item contribution made to institutional costs.

The Service's § 3652(b) argument, as we understand it, is that because the compliance report must present these worksharing-related statistics for each market-dominant *product*, a relationship between a rate, or a unit cost, falling under product A and some corresponding quantity associated with product B cannot be a worksharing relationship. This assumes, no doubt correctly, that § 3652(b) is meant to require avoided cost and passthrough information on every (market-dominant) worksharing rate that currently exists.³ It is not evident, however, that § 3652(b) requires "per-item cost avoided" to be calculated solely with intra-product inputs.

The simplest possible case of a "market-dominant product for which a workshare discount [is] in effect" would be a type of mail comprising just two products – e.g., presorted and non-presorted – and offering just two rates, one for each product. Assume further that (i) the presorted and non-presorted mail types have identifiable demand as well as cost differences, and (ii) the rate differential substantially equals the cost differential, which (iii) is fully accounted for by the mailer-supplied presortation.⁴ Section 3652(b) requires the information which would demonstrate (ii), which in turn would require a demonstration of (iii), in order to generate the passthrough figure required by subsection (b)(2).

³ If worksharing rates existed which were *not* required to be reported on under § 3652(b), the Service's argument would be a non-starter: there would be no compulsion to interpret § 3622(e) "in a manner consistent with" a provision whose scope was narrower than its own.

⁴ That is: the cost the Service avoids by the mailer's performing the sortation is substantially equal to the discount offered.

In this situation, however, the only way to calculate avoided cost is to compare the presorted and non-presorted products. Since the presorted product has only one set of sortation requirements, and hence only one set of costs and one rate, no comparison *within that product* is possible. The information required by § 3652(b) can be generated only by comparing one *product* with another. And this is true even though, *ex hypothesi*, the relationship between the two products is a worksharing relationship.⁵

It therefore seems that the reporting called for by § 3652(b) not only permits but can sometimes logically require cost and rate comparisons between two separate products. Consequently, reading § 3622(e) to cover such relationships does not violate any requirement of interpretative consistency with § 3652(b).

“Cost avoided.” The function of a benchmark like the one at issue here is to facilitate calculation of the cost avoided by one or more types of worksharing. This exercise is the one pinpointed by § 3652(b)(1): “[t]he per-item cost avoided by the Postal Service by virtue of such discount.”⁶ The in-currence of worksharing-related costs, however, is not a function of product status or its absence, but of whether the Service is or is not obliged to perform certain costly operations. Nothing in the language of § 3652(b)(1) suggests that in quantifying these cost differences the analyst may not cross product lines if necessary.

Effect of § 3622(e)(4). There is yet a further indication that inquiry into worksharing-related relationships between one product and another is not only appropriate but may be mandatory. Section 3622(e)(4) requires that –

⁵ 39 U.S.C. § 3622(e)(1) defines “workshare discount” as “rate discounts provided to mailers for the presorting, prebarcoding, handling, or transportation of mail, as further defined by the Postal Regulatory Commission under subsection (a).”

⁶ “[B]y virtue of such discount” presumably means “by virtue of mailers’ qualifying their mail for such discount,” since the discount, considered in isolation, has no effect on cost.

Whenever the Postal Service establishes a workshare discount rate, the Postal Service shall, at the time it publishes the workshare discount rate, submit to the Postal Regulatory Commission a detailed report that –

* * *

(C) certifies that the discount will not adversely affect rates or services provided to users of postal services who do not take advantage of the discount rate.

At the establishment of a situation like the one hypothesized above, complying with this requirement would clearly entail comparisons of “before and after” average unit costs and unit rates as between the new presorted product and the remaining non-presorted product.

GCA suggests, therefore, that nothing in, or implied by, § 3652(b) forbids comparing costs as between one product and another, where that is the most appropriate way of establishing worksharing differentials.

Are inter-product worksharing comparisons inherently suspect? Apart from any supposed influence of § 3652(b), does anything in the notion of “product,” as ordinarily used, suggest that cost comparisons performed to establish efficient worksharing discounts should be restricted to the particular product concerned?

The simple hypothetical case discussed above in connection with § 3652(b) is obviously relevant to this question too, at least as showing that an inter-product comparison may be necessary to reach any conclusion at all. Apart from what the hypothetical suggests, however, there appears to be nothing in § 3622(e) that counsels against (let alone prohibits) inter-product comparisons. As the Public Representative has pointed out⁷, that section nowhere uses the

⁷ Docket No. R2009-2, Public Representative Comments in Response to Notice of Price Adjustment for Market-Dominant Price Adjustment (March 2, 2009), p. 10.

term “product.” Its definition of “workshare discount,” quoted above, does not imply a limitation to intra-product comparisons. Obviously, there are common-sense limits on how far afield one may range in making inter-product comparisons: it would be pointless, for example, to compare costs for entirely different processing streams (e.g., letter sorting and flat sorting) in estimating the cost avoided by the mailer’s performing a particular operation on letters. Similarly, where two products exhibit demand as well as cost differences – the situation the Service points to in connection with First-Class Letters – it is unlikely that *the average piece* within one product will migrate to the other. In a situation, however, where one product is essentially a workshared version of the other, or (as here) of an identifiable subspecies of the other, such comparisons are clearly useful; and since the statute does not foreclose them, they should be made.

The relevant characteristics of Bulk Metered Mail. That is the situation as regards Presort and BMM. The question on which this rulemaking turns is, after all, whether a particular subtype of Single-Piece – Bulk Metered Mail – is the correct benchmark for Presort.⁸ The BMM benchmark antedates the Postal Accountability and Enhancement Act of 2006 (PAEA) and its introduction of the “product” concept. The benchmark was chosen because the mail it described was that closest, in terms of physical configuration, to Presort and the most likely to convert to that status. While it would be a mistake to call Presort no more than a “workshared version” of Single-Piece, it can hardly be denied that it is a “workshared version” of the fraction of Single-Piece represented by BMM.

The fundamental thrust of § 3622(e) is to prevent or limit the establishment of workshare discounts greater than avoided cost. While the prohibition in § 3622(e)(2) is subject to exceptions – some of them very broad – it remains the basic *raison d’être* of the entire provision. It nowhere specifies that, in the taxonomy of postal classes and products, some of the taxa are appropriate fields for

⁸ We deal in section II, below, with the (centrally important) difference between a comparison of Presort and Single-Piece and a comparison of Presort and BMM.

cost comparison and others not. The question, in each case, must be “what costs⁹ are avoided when a mailer qualifies a mailing for a given workshared category?” If answering this question entails crossing product boundaries, § 3622(e) does not forbid it.

II. The relevant comparison

Apart from questions of statutory interpretation, considered above, there is a basic flaw in the Postal Service’s approach. It focuses on Single-Piece and Presort as separate products – dealing with each of them as an unanalyzable unit – and argues that because each is a distinct product the relationship at issue here cannot be a worksharing relationship. It acknowledges the Commission’s earlier observation that worksharing relationships may cross product boundaries, but points out that in the same *Annual Compliance Report*¹⁰ the Commission distinguished products – which under PAEA (39 U.S.C. § 102(6)) must exhibit distinctive cost *or* demand characteristics – from subclasses, which under the 1970 Act were uniformly held to have cost *and* demand differences. Single-Piece and Presort, the Service continues, do have both cost and demand differences; it cites the new Mail Classification Schedule and Commission Order No. 43, in which this proposition was accepted.

“Cost difference plus demand difference” not the sole standard. Preliminarily, we should note that the Commission did not make the presence of both cost and demand differences solely dispositive on the question whether worksharing cost comparisons can cross product boundaries. In the 2007 *Annual Compliance Determination*, the Commission said, “Whether or not a rate differential is a worksharing discount *may depend, in part*, on whether the categories in

⁹ In practice, this will mean both (i) what type of cost (sorting? barcoding? transportation?) and (ii) how many cents per piece?

¹⁰ Docket No. ACR2007, *Annual Compliance Determination*, pp. 63-64.

question have substantially similar demand characteristics.”¹¹ Whether a particular rate is a worksharing discount cannot be settled by mechanically applying a pre-PAEA subclass-status test. Thus, while the Commission’s observations cited by the Service are certainly relevant, they do not dispose of the problem.

The relevant comparison. There is, however, a more fundamental problem with the Service’s analysis. The Service “believes that presort First-Class Mail has both distinct cost *and* market characteristics from single-piece First-Class Mail (including BMM).”¹² It does; but the comparison relevant to this issue is not between Presort and Single-Piece. It is between Presort and BMM.

Bulk metered mail is neither a subclass, nor a product, nor a rate category. It is the subspecies of Single-Piece First-Class letter mail which exhibits characteristics making it a credible candidate for conversion to Presort. That property of BMM is of interest when rates are being designed – at which point it is needed as a benchmark – but not otherwise. It might indeed be preferable to think of BMM, not as a grouping of mail, but simply as a more or less abstract pattern of cost incurrence, generated by certain material characteristics of the mailpieces and the manner in which they are entered.¹³

¹¹ Ibid., fn. omitted (italics added).

¹² Response to CIR No. 1, p. 2; fn. omitted.

¹³ There has, in fact, been controversy over whether BMM even exists in the real world. In Docket R2000-1, for example, the Commission noted that

[NAPM/ABA witness] Clifton advocates abandoning the use of bulk metered mail (BMM) as the benchmark for First-Class workshared mail. He argues that BMM has become a hypothetical type of mail, which does not exist in the mail stream. Mail that does not exist cannot convert to worksharing, and therefore is not an appropriate benchmark. . . .

PRC Op. R2000-1, ¶ 5071. The Commission accepted the Postal Service’s evidence that “at least some BMM does exist in the mailstream.” Id., ¶ 5089. A related issue arose in Docket R97-1, where the Service emphasized the essentially comparative role of the BMM benchmark:

With respect to the selection of a benchmark, the Service says Clifton’s contention that there is an insufficient volume history for adopting BMM “missed the point,” since the benchmark represents a pricing reference point to identify appropriately workshar-

Single-Piece, on the other hand, is a highly heterogeneous category, containing everything from stamped, hand-addressed personal correspondence to computer-addressed business letters paid by meter strip and – relevantly for this question – entered in bulk quantities. This heterogeneous Single-Piece category *as a whole* exhibits demand as well as cost differences from Presort. Hence it would be unreasonable to use the average cost of Single-Piece Letters as a benchmark for Presort; at that level, we would clearly be confronted with a structure analogous to distinct pre-PAEA subclasses.¹⁴ But this does not mean that a cost benchmark based on a distinguishable fraction of Single-Piece is inappropriate. If BMM does *not* exhibit a demand difference from Presort, it may – if the choice is justified otherwise – be precisely the right benchmark for measuring the cost difference.

The Postal Service's argument in response to CIR No. 1 seems to involve a fallacy of division. Because Single-Piece *as a whole* and Presort *as a whole* show both cost and demand differences (suggesting that it would be a mistake simply to assume that the latter is a workshared version of the former), the Service concludes that no identifiable subtype of Single-Piece could constitute one term of a worksharing cost comparison, with Presort as the other. But this does not follow. A composite entity, considered as a whole, may have a certain property even though some elements of the composite do not have it.¹⁵

ing savings and is not meant to imply that every piece is from the pool of bulk metered pieces.

PRC Op. R97-1, ¶ 5084; citation omitted.

¹⁴ Of course, even before PAEA, the Commission had rejected the average Single-Piece letter benchmark. PRC Op. R97-1, ¶¶ 5093 et seq.

¹⁵ We can meaningfully say, for instance, that a band played badly without thereby entailing that every individual musician in the band played badly.

In fact, a compelling argument in favor of the BMM benchmark is that, in terms of demand, BMM and Presort are at least close cousins and may be actually indistinguishable. The Commission has pointed out that such mail can migrate in either direction. In Docket R2006-1, at ¶ 5109, the Commission stated that it

. . . continues to believe that this benchmark “represents not only that mail most likely to convert to worksharing, but also, to what category current worksharing mail would be most likely to revert if the discounts no longer outweigh the cost of performing the worksharing activities.”
Docket No. R2000-1, ¶ 5089.

If a sender of bulk metered mail has no motive for switching to Presort (or back to Single-Piece) except the relationship between its own worksharing cost and the workshare discount currently offered, it seems to follow that the demand characteristics of BMM and Presort are for practical purposes identical.

The problem can also be looked at from another angle. The function of the BMM benchmark is not to lay the foundation for a rate, but to provide a credible basis for estimating the real-world savings from worksharing performed on mail which is *not* BMM but Presort. Bulk metered mail is not, in the language of § 102(6), “a postal service with a distinct cost or market characteristic for which a rate or rates are, or may reasonably be, applied [.]” It would be better described as a segment – presumably the end segment – of a continuum extending from hand-addressed stamped letters to letters which are virtually automation-ready. It is distinguished from the rest of Single-Piece mail for the limited purpose of constructing efficient Presort rates. Once that is recognized, it becomes clear that to argue against the BMM benchmark on the basis that “single-piece First-Class mail (including BMM)” and Presort are distinct products in demand as well as cost terms is largely beside the point. The Mixed AADC Automation rate, for example, is not a discount from a notional “BMM rate”; it is a Presort rate constructed by reference to BMM costs.

III. Preliminary conclusions

GCA submits that the discussion above leads to four conclusions of prime importance for this rulemaking:

- There is nothing in, or implied by, the language of PAEA that forbids using inter-product comparisons to develop worksharing cost avoidances, where that technique gives the most realistic results;
- There is, equally, nothing in the concept of “product” established by PAEA that suggests such comparisons are improper;
- Bulk Metered Mail is of interest only as providing a benchmark for design of Presort rates via development of realistic cost avoidance figures, so that its location within the Single-Piece category is irrelevant; and
- It cannot be argued that simply because Single-Piece and Presort are separate products the BMM benchmark is inappropriate, since the relevant comparison is not between Single-Piece and Presort as such but between BMM and Presort.

These conclusions, while they point to reaffirmation of the BMM benchmark as the correct conclusion to this proceeding, do not dispose of all the issues before the Commission. The Service has presented an alternative argument, which hypothesizes that the Commission has ruled that the BMM/Presort relationship is a type of worksharing and that the BMM benchmark continues to govern, and on that assumption seeks to show that it nonetheless can be departed from. We turn next to that argument.

IV. Justification of excessive discounts under § 3622(e)(2)(D)

The Postal Service's alternative argument rests on a broad exception to the efficient component pricing principle, set forth in 39 U.S.C. § 3622(e)(2)(D):

(2) SCOPE.— The Postal Regulatory Commission shall ensure that such discounts do not exceed the cost that the Postal Service avoids as a result of workshare activity, unless –

* * *

(D) reduction or elimination of the discount would impede the efficient operation of the Postal Service.

If the BMM-Presort relationship “were to be considered worksharing subject to section 3622(e),” the Service states,

section 3622(e)(2)(D) would justify the deviation from 100 percent, since, as described above, hitting the 100 percent target would most likely require large swings in other, non-workshare related, prices.^[16]

GCA does not necessarily disagree with the idea that such swings, if they occurred, could hinder efficient operation.¹⁷ All the same, a few observations on this argument are in order.

A. The Service states that it starts the process of designing First-Class rates by settling on a (Single-Piece) stamp price. In this case, the choice was \$0.44, which, in the Service's view, dictated a smaller-than-average increase for Presort; and that in turn implied a Mixed AADC passthrough greater than the BMM-Mixed AADC cost difference.¹⁸ The Service identifies three factors relevant

¹⁶ Response to CIR No. 1, p. 5.

¹⁷ We do not, on the other hand, believe that the Service's Docket R2009-2 submission demonstrated, or even came close to demonstrating, that the § 3622(e)(2)(D) exception applies to the First-Class worksharing situation.

¹⁸ *Id.*, pp. 3-4.

to the choice: the size of the price cap (3.8 percent), the stamp price, and “the relative size of these two mail categories within First-Class Mail.”¹⁹

This description seems to imply that the Service did not use information from the Presort rates it had calculated as feedback in a reconsideration of the initially selected stamp price. It may be that in this case such reconsideration would not have led to a different stamp price, given the whole-cent constraint. As a general matter, however, it would seem that any presentation seeking to justify departure from the 100-percent passthrough principle on the basis of a § 3622(e) exception should include either a description of such reconsideration or a showing that it would have been unproductive. That requirement could appropriately be made part of the Commission’s rate adjustment filing requirements.

B. “Efficient operation of the Postal Service” is not defined in § 3622(e). It therefore is of some importance to decide whether the § 3622(e)(2)(D) standard is satisfied (i) if the Service can show merely that *in some one respect* reducing a discount yielding an excessive²⁰ passthrough would impede efficient operation, or (ii) only if the Service can show that such a reduction would impair its efficiency *overall*. For example, suppose that a particular discount produced a passthrough of 150 percent. Assume that the Service can show that reducing the discount to the 100-percent passthrough level would produce disruptions in mail mix and operational patterns with a total extra cost of \$50 million. On the other hand, assume also that the net revenue the Service gives up by “overpricing” (in ECP terms) the worksharing underlying the discount can be reliably estimated at \$75 million. Under the first alternative standard above, the excessive discount might be justified; under the second, in GCA’s view, it cannot.

¹⁹ We understand the last factor to refer to Single-Piece and Presort. A fourth factor might be added (limited, one may hope, to current financial circumstances): the Service’s need to reprice all mail as nearly as possible up to the cap.

²⁰ In this part of the discussion, we use “excessive” to mean “greater than the cost avoided by the worksharing” – i.e., “excessive” in efficient component pricing (ECP) terms.

Another way to view this question is to ask whether “efficient operation of the Postal Service” in § 3622(e)(2)(D) refers only to “operation(s)” in the narrower sense – in which case discouraging worksharing by reducing an excessive discount might well be said to “impede” efficiency, so defined – or to efficiency of the overall conduct of the Service’s affairs. In the latter case, reading § 3622(e)(2)(D) consistently with standard (ii) above would be more appropriate. Another provision of PAEA can provide some guidance here: the first of the objectives set out in § 3622(b) is “(1) To maximize incentives to reduce costs and increase efficiency.” We note that § 3622(b)(1) – which seems clearly, though perhaps not exclusively, directed at worksharing incentives – speaks not of “efficient operation” but of “efficiency.” This suggests that the governing objective of the ratemaking system, in this regard, is the *overall* efficiency of the postal system.²¹ Thus § 3622(e)(2)(D) and § 3622(b)(1) can be harmonized by reading “efficient operation” in the former to refer to overall efficiency as well.

If this reading is accepted, as GCA believes it should be, then it follows that in seeking to justify an excessive discount the Service should show not only the effects on mail operations of reducing the discount to the ECP level, but also the effect on overall efficiency of not reducing it. If the operational cost of reducing the discount is reliably shown to be greater than the loss from leaving it at an excessive level, the best (or less bad²²) course may be to tolerate it in reliance on § 3622(e)(2)(D).

Although a situation of this kind cannot be declared impossible a priori, and may have to be tolerated for a time, it is still worthwhile to consider ways of

²¹ In view of the general efficient-pricing rule of § 3622(e), the phrase “to maximize incentives” in § 3622(b)(1) cannot be read as calling for incentives greater than avoided cost.

²² “Less bad,” because even if the bottom-line “consequential damages” from reducing the discount would exceed the inefficient-pricing loss, a discount in excess of ECP levels still misallocates resources as between discount-using and non-discount-using mailers. That the effect of worksharing discounts on non-worksharing mailers was of concern to Congress is shown by subsections 3622(e)(3)(B) and (e)(4)(A), as well as by the general § 3622(e) policy favoring efficient component pricing principles.

alleviating it. One possibility is for the Commission to require that when the Service justifies an excessive discount by showing that the purely operational cost of reducing it would be greater than the inefficient-pricing loss it entails, it also submit a plan, and a schedule, for eliminating the excess over a reasonable time.

C. The Postal Service's § 3622(e)(2)(D) argument, while general in scope, was offered in the context of a specific rate adjustment, as one way of explaining and justifying certain rates which depart from § 3622(e) principles. One question important for this docket, therefore, is how far the availability of the § 3622(e)(2)(D) exception²³ need be (or can be) clarified by Commission rulemaking.

It seems evident that the Commission has authority to define and regulate, by rulemaking, the scope of the exception. Section 3622(e)(2) requires the Commission to "ensure" that discounts do not exceed avoided cost, except in the situations described in the four paragraphs creating exceptions to that rule. It would be difficult for an agency charged with "ensuring" compliance with a statutory rule accompanied by a statutory exception to carry out that mission if it were authorized to interpret the rule but not the exception – particularly when the exception is as vague as § 3622(e)(2)(D).

GCA has suggested an appropriate interpretation of "efficient operation," in section B., above, which could be effectuated as an interpretative rule. Our proposed interpretation, if adopted by rule, would entail certain filing requirements applicable to the rate adjustment process: the Service would need to show the effects on efficiency both of reducing the excessive discount and of not reducing it. The additional filing requirement we proposed in the last paragraph of that section could also be included in 39 CFR § 3010.14(b)(6), so that when the

²³ And perhaps the other three exceptions provided by § 3622(e)(2). These, however, are much less open-ended than subparagraph (D) and so in less need of clarification by rulemaking.

Service proposes to retain, for a time, an excessive discount the related plan and schedule would be available from the start of the rate adjustment process.

V. Conclusion

The discussion above shows, in GCA's view, that the legal arguments the Postal Service advances to show that the BMM benchmark is no longer appropriate are invalid, both because the statutory text does not support them and because they focus on a cost comparison – Presort vs. Single-Piece as a whole – which is not part of the benchmarking process. The reasoning the Commission, and others, have long accepted as justifying the BMM benchmark remains valid.

The Service's claim that the "efficient operation" exception of 39 U.S.C. § 3622(e)(2)(D) supports those R2009-2 discounts exhibiting passthroughs greater than 100 percent has not been supported. The general theory behind it may, in some cases, be valid. To be workable, however, the argument that an excessive discount is excused by the effect of reducing it on "efficient operation" must rest on a settled definition of "efficient operation." In view of the statute's pervasive concern with overall efficiency, the correct definition seems to entail considering losses from inefficient (in ECP terms) discounts as well as operational cost penalties that might ensue from reducing the discounts to ECP levels. GCA submits that such a showing should be a mandatory part of any Postal Service filing that seeks to justify excessive discounts under § 3622(e)(2)(D).

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Respectfully submitted,

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