

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Modification of Mail Classification Schedule  
Regarding Forever Stamps

Docket No. MC2010-22

PUBLIC REPRESENTATIVE COMMENTS IN RESPONSE TO  
UNITED STATES POSTAL SERVICE NOTICE OF CLASSIFICATION CHANGE  
RELATED TO FOREVER STAMPS

(May 6, 2010)

In response to Order No. 447<sup>1</sup>, the Public Representative hereby comments on the April 23, 2010 Notice (and April 26 Errata) of United States Postal Service of a Classification Change Related to Forever Stamps (Notice).

The Postal Service Notice, Spartan in its exposition, is persuasive.

The minor change(s) to the Mail Classification Schedule (MCS) comports with the requirements of 39 U.S.C. 3642, and is consistent with the authority of the Postal Service Board of Governors. All notice and publication requirements are fulfilled through the Notice itself.

There is no reason the Commission should not approve the Postal Service's change in description of Forever stamps in the MCS.

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<sup>1</sup> Commission Order 447, Notice and Order Concerning Classification Change, April 27, 2010.

## Discussion

The issue presented in this Docket is extremely narrow. Nevertheless, the general public might appreciate a more thorough explanation of what “Edits to Mail Classification Schedule” [sic] (the heading on the second pages of the April 23 and April 26 documents in the Postal Service’s Notice) signifies. The Postal Service asserts that the change in description is “needed in the event that the Postal Service offers Forever stamps in more than one design ...” Notice, at 1. In other words, this change is the harbinger for the Postal Service issuing Forever stamps with new designs.

The Forever stamp, championed – before Postal Service adoption – by the current Chairman Ruth Y. Goldway, was a win-win proposition when the R2006 rate changes were implemented in May 2007. Three years later, the “Forever” concept has maintained its utility through two First-Class rate changes. A common question heard around those rate change implementations – “How long is this [Forever stamp] good for?” – has been answered (and perhaps settled in the minds of customers).

No-value indicator (NVI) postage has been used in the United States since October 14, 1975. During a period of uncertainty regarding a pending rate increase, the Postal Service issued hundreds of millions of \$0.10 Christmas Stamps without denomination, to avoid the cost of reprinting (with a new denomination). That rate adjustment, from \$0.10 to \$0.13, was effective December 31, 1975. During the next rate change in May 1978, “A” stamps (worth \$0.15 each) were used by the American public for First-Class letter postage. After progressing through the alphabet to “H,” the Postal Service opted for non-denominated designs. Including the three semi-postal

stamps, there are 58 examples of NVI postage, all valid for use. For the convenience of customers the Postal Service's *Quick Service Guide 604a*<sup>2</sup> (available at usps.com), provides the value in postage that each of these represent.

After 57 representations of NVI postage, "Forever" was a welcome simplification. Meanwhile, in October 2006, Canada Post Corporation had announced its Permanent™ stamp. Instead of a value, these stamps display a white capital "P" on a red maple leaf, which is itself within a white circle. Canadian customers may use this stamp – which covers the cost of mailing a standard letter up to 30 grams within Canada – forever. Canada Post will accept Permanent™ stamps for use no matter what their domestic postage prices are, or may be. They are available in a variety of designs.

A number of postal administrations issue NVI postage and the concept is sound. Furthermore, the Postal Service has acquired "ownership of the trademark 'Forever' in connection with postage stamps." Notice, at 1. One must conclude that the Postal Service will soon introduce Forever™ stamps in new designs. While stamp design is entirely outside the bailiwick of the Commission, 39 U.S.C. 3642(b)(3)(B) requires that, in making any decision under section 3642, the Commission must consider:

the views of those who use the product involved on the appropriateness of the proposed action ...

Accordingly, this Public Representative urges the Commission to advise the Postal Service that care should be taken to avoid any possible (further) confusion. The State House bell, or "Liberty Bell," as abolitionists called it (after an inscription on the bell, "Proclaim liberty ..." see Leviticus 25:10), is an iconic image that conveys unity among

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<sup>2</sup> Retrieved from <<<http://pe.usps.com/cpim/ftp/manuals/qsg300/q604a.pdf>>> May 5, 2010

the people of the United States, reminding us of values upon which this Nation was founded. The imperfect bell itself may not be “pretty,” or aesthetically pleasing, but its beauty is absolute. The Postal Service is to be commended on selecting this image and the message its use conveys about our Nation and the mailing public. Now the image of the Liberty Bell used on the Forever™ stamp is linked with enduring value (albeit of a monetary nature) in the minds of postal customers. Introducing new images must be done in a thoughtful manner.

It would be quite sensible to issue NVI postage by product, or weight (a “second-ounce Forever™ stamp, for example). Before converting all commemorative stamp issues into Forever™ stamps, the Postal Service might wish to confer with philatelists to assess the impact such a move would have on the stamp collecting hobby and stamp purchases in the United States. Collectors have provided the Postal Service modest (considering Postal Service annual budgets) but consistent revenue for decades.

Postal customers who wish to make personal statements with their postage have several options to create postage using their own digital images. This practical solution also bears the postage value, at a valid rate when the postage was printed. The Postal Service licenses providers of these “stamps” and their authenticity is validated through coding printed on the postage.

The Postal Service maintained the Purple Heart First-Class definitive stamp design when higher rates were implemented. The wisdom in that decision gives hope to anyone wondering whether the Postal Service will continue to produce stamps conveying historic and cultural values the United States holds dear.

## Conclusion

The Public Representative recognizes the extreme financial concerns the Postal Service is facing. These comments, made on behalf of the general public, are offered in the spirit of openness and accountability.

Representing "Forever" is an epic quest. The challenge do so in postage stamp-size goes beyond paradox to absurdity. It is a task that only the Postage Service might be expected to do successfully. In 1974 Muhammad Ali won the World Heavyweight Champion title for the third time. Sports journalist Howard Cosell paid tribute by reciting lyrics from the Bob Dylan song, *Forever Young*. These lines may be apropos here:

May you grow up to be righteous  
May you grow up to be true  
May you always know the truth  
And see the lights surrounding you  
May you always be courageous  
Stand upright and be strong  
May you stay forever young  
Forever young, forever young  
May you stay forever young.

The Public Representative respectfully submits the preceding Comments for the Commission's consideration.

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