

Before the  
POSTAL REGULATORY COMMISSION  
Washington, DC 20268-0001

Modification of Mail Classification :  
Schedule Regarding the Issuance : Docket No. MC2015-42  
Of New Forever Stamps :

COMMENTS OF THE GREETING CARD ASSOCIATION

The Greeting Card Association (GCA) files these Comments pursuant to Order No. 2414 (March 26, 2015). GCA fully supports the proposed extension of Forever status to stamps for postcards, additional letter weight increments, and non-machinable pieces.<sup>1</sup>

Since its introduction, the Forever Stamp has been an outstanding success with consumers; GCA believes that it has slowed the decline of Single-Piece First-Class letter mail by making it easier to use. *Household Diary Study* statistics show relatively steady volume trends from year to year for greeting cards and other personal correspondence, as opposed to much steeper declines in bill payments (where only the quantitative information being conveyed is important, so that conversion to on-line payment entails little or no loss of value to either party). This last distinction is significant for this case, since it indicates that greeting cards and, often, other forms of personal correspondence have value to the recipient beyond their purely informational content. The form and design of the piece accounts for much of this added value, and providing this value very often requires a heavier piece or one falling outside the proportions of the ma-

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<sup>1</sup> GCA also agrees with the Postal Service's conclusion (Notice of Minor Classification Changes, p. 1, fn. 1) that this change should be treated as a minor classification change subject to 39 CFR Part 3020, Subpart E.

chinable-letter template. GCA provided evidence and argument on this point as long ago as Docket R2006-1<sup>2</sup>, and it remains valid.

In this connection, it seems clear that the proposed changes are a logical, and welcome, extension of the existing Butterfly Stamp, which provides a convenient means of paying the non-machinable surcharge. The Butterfly Stamp exemplifies creative cooperation between the Postal Service and a sector of the mailing industry, to the ultimate benefit of the American consumer. Continuation of the Butterfly Stamp as part of the expanded Forever Stamp program, as well as simplifying life for the citizen mailer, should encourage more high-contribution First-Class correspondence mail. It is highly relevant that Single-Piece First-Class letter mail showed a cost coverage of 177.38 percent in FY 2014.<sup>3</sup>

Moreover, as the Postal Service points out, economies in stamp printing and management can be expected to result from the change.

Accordingly, GCA respectfully urges the Commission to approve the proposed changes in the description of the relevant Single-Piece First-Class products.

April 2, 2015

Respectfully submitted,

GREETING CARD ASSOCIATION

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<sup>2</sup> See the Docket R2006-1 testimony of GCA witness Andrea Liss (GCA-T-4) and Initial Post-Hearing Brief of the Greeting Card Association, pp. 73-77.

<sup>3</sup> Docket ACR2014, Public Cost and Revenue Analysis report.