

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Public Inquiry on Changes :
Associated with the Delivering : Docket No. PI2023-4
For America Plan :

MOTION OF THE GREETING CARD ASSOCIATION FOR
ISSUANCE OF AN INFORMATION REQUEST

The Greeting Card Association (GCA) hereby moves for the issuance to the Postal Service of an information request covering some highly important aspects of its *Delivering for America* plan (hereinafter abbreviated "*DfA*"). These aspects were not addressed in Chairman's Information Request No. 1 (June 21, 2023).

The *DfA* plan depends pervasively on certain projections. See, e.g., the discussion at page 9 of the *DfA* report (market-dominant mail) and page 42 (base case). It postulates that by 2030 market dominant mail volume will decline by 37 percent and package volume will increase by about seven percent. The plans for reconfiguring processing, transportation, and delivery facilities and operations necessarily conform to these projections. At a finer level of detail, the *DfA* report (p. 42) states that the projected decline in market-dominant mail will result from substitution of electronic media for physical mail, and that the presumed rate of substitution is consistent with what the Postal Service has observed over the last decade. Why the same trend should be expected to continue is not discussed.

Nowhere in the report are the assumptions, methods, and data sources underlying these projections disclosed.

It is GCA's view that unless these projections are fully explained and the reasoning governing them made clear, the entire *DfA* plan cannot be evaluated. Not all aspects of the plan

can be expected to come before the Commission in an advisory opinion case under 39 U.S.C. 3661. For example, *DfA* set out a plan to utilize all the market-dominant pricing authority provided by the statute and the new rules enacted in Docket RM2017-3. The revenue projections in *DfA* apparently rest on this postulate, but since it does not necessarily imply a change in the nature of service it would apparently not fall within section 3661. Consequently, the projections should be explained and justified in *this* proceeding.

GCA therefore respectfully requests the issuance of an Information Request containing (at least) the following questions:

“1. Please explain fully the method(s) used to develop the projections contained in *Delivering for America*, including (without limitation) projections of (a) market-dominant volume, by product, (b) competitive product volume, by product, (c) the rate of substitution of electronic media for market-dominant mail (referred to on p. 42 of *Delivering for America*), (d) the revenues anticipated from the volumes projected under (a) and (b) above., and (e) the additional costs anticipated from execution of the *DfA* plan.

“2. Please provide all workpapers, analyses, or studies prepared by or for the Postal Service which support or evaluate the projections referred to in question 1. If in any instance no such workpaper, analyses, or studies exist please explain why they were not prepared.”

GCA further respectfully requests that: (1) the requested information be produced publicly, to the extent consistent with law and applicable Commission policy; (2) information generated by spreadsheets be produced in Microsoft Excel or (if necessary) another easily available spreadsheet format; and (3) any formulas embedded in the spreadsheets be preserved in the response.

August 14, 2023

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. B1
Arlington, VA 22206-1450
(703) 998-2568 or (703) 395-1765
E-mail: postamp02@gmail.com