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February 18, 2025

Karin A. Orvis, Chief Statistician  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
725 17th St. NW  
Washington, D.C. 20503

**RE: Docket ID USBC-2024-0032; Statistical Policy Directive No. 8 North American Industry Classification System (NAICS)-Request for Comments on Possible Revisions for 2027**

Dear Ms. Orvis:

Thank you for the opportunity to comment on the North American Industry Classification System (NAICS) revisions for 2027.

Headquartered in Philadelphia, Pennsylvania, PRINTING United Alliance is North America's leading printing and graphic arts trade association serving 3,000 organizations representing more than 20,000 members. Founded in 1948, the association has since grown and adapted to an all-inclusive model representing printing segments across industry verticals. The Alliance provides industry professionals with education, training, events, research, government representation, and sustainability guidance. The Alliance includes prominent media brands and organizes the annual PRINTING United Expo, a major event showcasing technology, services, and education across market segments.

### **Printing Industry Classification**

The printing industry's size and contributions to the American economy have expanded well beyond the current NAICS<sup>1</sup> classification. Failure to capture this expansion has resulted in the narrative of the value of print becoming distorted. Properly defining and sizing the printing industry will help to combat misconceptions and demonstrate the importance of our essential sector. **PRINTING United Alliance is calling for up-to-date, modern classifications in the NAICS to accurately reflect the full scope and economic impact of the printing industry.**

### **Current NAICS Classification**

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<sup>1</sup> <https://www.census.gov/naics/?input=323&year=2022>

Establishments primarily engaged in printing are classified in **NAICS 323: Printing and Related Support Activities**. All substrates and printing processes are included. Establishments that manufacture the substrates on which they print or own copyrights to the material printed are not included. NAICS 323 is broken into the following subcategories:

NAICS 323	NAICS Title
32311	Printing
323111	Commercial Printing (except Screen & Books)
323113	Commercial Screen Printing
323117	Books Printing
323120	Support Activities for Printing

### Recommended Revisions

Allow all establishments engaged in the printing industry to define themselves more accurately while also increasing the scope and consistency of NAICS 323.

Current NAICS 323	Proposed NAICS 323
Printing and Related Support Activities	Printing and Related Support Activities
Printing	Printing
Commercial Screen Printing	Apparel Decoration
Commercial Printing (except Screen and Books)	Commercial Printing (General and Specialty)
Books Printing	Books Printing
Support Activities for Printing	Support Activities for Printing
	Industrial/Functional Printing
	Package Printing
	Label Printing
	Promotional Products Imprinting
	Publications Printing
	Wide-format Printing/Sign and Display

We are grateful that PRINTING United Alliance had the opportunity to connect with Vincent Russo, Co-Chair of the Economic Classification Policy Committee (ECPC). The Alliance's Chief Economist, Andy Paparozzi, answered the following questions posed by Mr. Russo:

**Russo Question:** How does the proposal disaggregate and increase consistency?

**Paparozzi Answer:** Currently NAICS 323 includes the broad product category "commercial printing," the process category "screen printing" (primarily used in apparel decoration), and the specialty "book printing." We propose defining everything by product regardless of printing process: apparel decoration (process could be screen, dye sublimation, direct-to-garment, direct-to-film, etc.), books printing, commercial printing, publications printing, sign and display

printing, package printing, label printing, promotional product imprinting, and industrial/functional printing.

**Russo Question:** How does the proposal expand?

**Paparozzi Answer:** Think of a printer specializing in wall graphics, floor graphics, displays, etc. The printer looks at 323 and thinks “I’m not a commercial printer, screen printer, or book printer,” so I guess I’m in NAICS 339950: Sign Manufacturing even though that also includes manufacturers of traffic signs and scoreboards.

Or the printer specializing in corrugated packaging. The printer thinks “I’m not a commercial printer, screen printer, or book printer,” so I guess I’m in 322211: Corrugated and Solid Fiber Box Manufacturing. Some companies will still classify themselves in NAICS 322211 because they see themselves as package manufacturers/converters rather than printers, but others will reclassify into 323 because they see their primary business as package printing.

Or the company that currently classifies itself under NAICS 33441: Semiconductor and Other Electronic Component Manufacturing. Some will continue in that code because they see component manufacturing as their primary business, with printing a minor part of the process. But others will reclassify into 323 because they see component printing as their primary business.

### **Recommendation for Printed Product Classification**

We highly recommend eliminating the “digital printing” and “quick printing” categories under NAICS 323. Digital printing is a production process, not a product. Everything from packaging to books can be printed digitally, and quick printing, although not a process, includes a wide range of products (flyers, newsletters, stationery, etc.).

### **Definitions for the Proposed Subcategories Under 323**

#### **Printing**

Establishments primarily engaged in printing on apparel and textile products, paper, metal, glass, plastics, and other materials, except fabric (grey goods). The printing processes employed include, but are not limited to, lithographic, gravure, screen, flexographic, digital, heat transfer, sublimation, and letterpress. Establishments in this industry do not manufacture the stock that they print, but may perform post printing activities, such as folding, cutting, or laminating the materials they print, mailing, and fulfillment.

#### **Apparel Decoration (New)**

Establishments primarily engaged in printing on apparel and textile products, such as aprons, T-shirts, pants and shorts, caps, footwear, gloves, jackets and outerwear, napkins, safety and workwear, socks and slippers, sportswear, sweaters, towels, and uniforms and scrubs, are included in this industry.

**Commercial Printing (General and Specialty)**

Establishments primarily engaged in commercial printing without publishing (except fabric grey goods printing). The printing processes used in this industry include, but are not limited to, lithographic, inkjet, gravure, flexographic, letterpress, engraving, and various dry- and wet-toner digital technologies. This industry includes establishments engaged in commercial printing on purchased stock materials, such as direct mail, marketing collateral, stationery, invitations, and similar items, on a job-order basis.

**Books Printing**

Establishments primarily engaged in printing or printing and binding books and pamphlets without publishing. Examples include almanacs, dictionaries, encyclopedias, textbooks, fiction and non-fiction books, pamphlets, music books, religious books, professional books, and travel guidebooks.

**Support Activities for Printing**

Establishments primarily engaged in performing prepress and postpress services in support of printing activities. Prepress services may include such things as platemaking, typesetting, trade binding, and sample mounting. Postpress services include such things as book or paper bronzing, die cutting, edging, embossing, folding, gilding, gluing, and indexing.

**Industrial/Functional Printing (New)**

Establishments primarily engaged in décor printing, laser coding, product marking, printing on electronics, such as circuit boards or batteries, ceramics, glass, nonwoven textiles, and direct to fabric textile printing.

**Package Printing (New)**

Packaging printing involves digital, flexographic, and rotogravure printing upon paper, paper board, metal foil, plastic film, and other substrates, which are, in subsequent operations, formed into packaging products. This includes, but is not limited to, folding boxes, cartons, containers, food containers, flexible packaging, and wrappers. Labeling and insertion of materials such as patient inserts, patient medication guides, and professional inserts and any other written, printed, or graphic materials accompanying a product and any brand security or anti-counterfeiting measures included in the packaging elements for a product are part of the finished packaged product.

**Label Printing (New)**

Establishments involved in printing and applying labels to products or packages for identification, branding, or regulatory compliance purposes. Establishments that print on various materials such as paper, vinyl, polyester film or Biaxially Oriented Polypropylene (BOPP), use of adhesives, and specialty finishes for client-owned materials.

**Promotional Products Imprinting (New)**

Establishments primarily engaged in using imprinting to stamp a brand design/logo onto an item, such as awards, business gifts, keychains, magnets, pens, prizes, stress balls, and specialty advertising products for clients who wish to use such materials for promotional purposes. Imprinting can be accomplished by digital printing, screen printing, pad printing, dye sublimation, embroidery, heat transfer, offset printing, laser engraving, chemical etching, embossing and debossing, and foil printing.

**Publications Printing (New)**

Establishments primarily engaged in printing magazines, academic and professional journals, periodicals, newsletters, calendars, and catalogs on web offset presses, responsible for trimming and binding, and preparing publications for mail delivery.

**Wide-format Printing/Sign and Display (New)**

Establishments primarily engaged in printing on large substrates which can range from two to more than 15 feet in width. Such printers typically use inkjet technology to print on a variety of substrates to print banners, posters, trade show graphics, wallpaper, murals, backlit film (duratrans), vehicle image wraps, electronic circuit schematics, architectural drawings, construction plans, backdrops for theatrical and media sets, and any other large format artwork or signage. Sign and display manufacturing includes traffic signs and scoreboards but also printers of counter, floor, point-of-purchase displays, and other wide-format graphics.

**Where Else Printing is Classified**

Establishments engaged in printing are classified in several other NAICS codes, including the following:

- 561439: Other Business Service Centers (including Copy Shops). Establishments primarily engaged in “photocopying service on photocopy equipment” and “document copying” are included here.
- 5131: Newspaper, Periodical, Book, and Directory Publishers. These establishments print and may even “fill excess capacity with commercial or job printing” but are copyright owners – i.e., consider publishing, rather than printing, their primary activity.
- 339950: Sign Manufacturing. Includes manufacturers of traffic signs and scoreboards but also printers of counter, floor, point-of-purchase displays, and other wide-format graphics.
- 322212: Folding Paperboard Box Manufacturing. Create folding boxes, cartons, containers, food containers, etc. from purchased paperboard.
- 322211: Corrugated and Solid Fiber Box Manufacturing. Create corrugated or solid fiber boxes, partitions, shipping containers, pallets, etc. from purchased paperboard.

## Conclusion

PRINTING United Alliance appreciates the opportunity to contribute to the 2027 NAICS revision process. We believe our proposal will permit all establishments engaged in printing to more accurately define themselves while also increasing the scope and consistency of NAICS 323. We thank the ECPC in advance for their consideration.

Respectfully submitted,



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