# Analysis of H.R. 2441 / S. 1877 – Improving Disclosure for Investors Act of 2025

This document outlines the key risks and potential negative impacts of the proposed legislation on the printing, mailing, and postal industries. The analysis reflects how this shift toward electronic delivery threatens a major American manufacturing sector and the broader communication infrastructure it supports.

## 1. Long-Term Structural Reduction in Print and Mail Volumes

The bills direct the SEC and self-regulatory organizations to amend every rule that still mandates delivery of documents 'in writing,' substituting electronic delivery as sufficient. This permanently reduces baseline print runs for statements, proxies, privacy notices, and prospectuses. Once implemented, these changes extend beyond securities filings and could set a precedent for federal ‘e-delivery by default’ policies across banking, insurance, and other regulated sectors.

Impact: A lasting structural decline in transactional mail and loss of recurring print and fulfillment work.

## 2. Accelerated Rulemaking and “Auto-Effect” Clause

If the SEC fails to finalize rules within one year, covered entities may immediately proceed with electronic delivery, and such delivery will be deemed compliant. This effectively removes public-comment safeguards and allows firms to adopt digital-only delivery with minimal oversight.

Impact: No transition cushion for printers and mailers; implementation could happen abruptly.

## 3. Removal of ESIGN Consumer-Consent Requirement

The legislation exempts these disclosures from Section 101(c) of the Electronic Signatures in Global and National Commerce Act (ESIGN). This eliminates the requirement that consumers affirmatively consent to electronic records and demonstrate access to digital formats.

Impact: Consumers may be forced into digital delivery without meaningful consent, disproportionately affecting seniors, rural residents, and low-income households.

## 4. No Provisions for Digital-Divide or Accessibility

The bills contain no specific provisions for broadband access, disability accommodation, or alternate formats. The only mention of accessibility is a general requirement for 'readability and retainability.'

Impact: Americans lacking reliable internet or digital literacy could lose access to timely financial information.

## 5. Privacy and Cyber-Risk Exposure

The legislation imposes limited confidentiality obligations and leaves cybersecurity details to the SEC’s discretion. Increased electronic transmission of personal data raises the risk of breaches and identity theft.

Impact: Heightened cybersecurity risks and potential cost burdens for firms and investors.

## 6. Precedent for Broader Federal and Corporate Digital Mandates

The bills require all self-regulatory organizations (such as FINRA and MSRB) to conform to the electronic delivery model, setting a precedent likely to expand into other sectors. This could lead to similar shifts in other areas of government and corporate communication.

Impact: A domino effect expanding digital-only communication models across industries.

## 7. Environmental “Greenwashing” Risk

Supporters of the legislation often cite sustainability benefits, yet this ignores the renewable, recyclable nature of paper and the significant carbon footprint of data centers and electronic waste. The Two Sides North America research underscores that many environmental claims for 'paperless' initiatives are misleading.

Impact: Cost-driven initiatives are disguised as environmental reform, harming perception of sustainable printing.

## Additional Areas to Explore

1. Commission an economic impact study to quantify job and revenue losses across print, mail, and logistics sectors.
2. Model USPS revenue exposure and postage-rate implications from reduced First-Class volumes.
3. Conduct consumer-choice polling specific to financial disclosures.
4. Assess broadband and digital literacy gaps affecting vulnerable populations.
5. Build a coalition including postal unions, accessibility advocates, and consumer-choice organizations.

These additional lines of inquiry will strengthen the policy argument against the bill and reinforce the need to preserve the right to choose paper-based communications.