

USPS-T-38

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

DIRECT TESTIMONY
OF
NINA YEH
ON BEHALF OF
UNITED STATES POSTAL SERVICE

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LIST OF ATTACHMENTS

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Attachment B	Bound Printed Matter Financial Summary
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LIBRARY REFERENCES SPONSORED

USPS-LR-L-41 Bound Printed Matter, Media Mail and Library Mail
Spreadsheets

1

AUTOBIOGRAPHICAL SKETCH

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My name is Nina Yeh. I am an Economist in Pricing and Classification, United States Postal Service. Since joining the Postal Service in 2003, I have worked on issues related to Bound Printed Matter, Library Mail, Media Mail and Periodicals. This is the first time I am testifying before the Postal Rate Commission.

7

8

Prior to joining the Postal Service I worked for the Long Island Business Institute as a Business Mathematics lecturer.

9

10

11

I earned a B.A. degree in Economics and Mathematics from New York University in 2000 and a M.A. degree in Economics from New York University in 2002.

1 **I. PURPOSE AND SCOPE OF TESTIMONY**

2 My testimony presents the Postal Service's pricing proposals for Bound
3 Printed Matter, Media Mail and Library Mail. My testimony will describe these
4 three mail subclasses, review their rate and volume histories, explain the
5 proposed rates, and discuss the financial impacts of my proposals.

6 Accompanying my testimony is Library Reference USPS-LR-L-41. This
7 library reference consists of electronic and paper versions of my spreadsheets.
8 Chapter II of my testimony describes my library reference and states how it
9 relates to my testimony.

10 In developing my testimony I have relied on the testimony and workpapers
11 of several other witnesses. These witnesses are identified in my testimony.
12 Detailed citations to their testimonies, workpapers, and library references are
13 provided in the notes accompanying my spreadsheets.

14

1 **II. LIBRARY REFERENCES**

2 As part of my testimony I am sponsoring library reference USPS-LR-L-41.
3 The following section describes the library reference and states how it relates to
4 this case.

5

6 **A. USPS-LR-L-41**

7 This library reference consists of paper and electronic versions of my
8 spreadsheets. I created these spreadsheets to produce my rate proposals for
9 Bound Printed Matter, Media Mail and Library Mail rates. Organizationally, I
10 have divided my spreadsheets into two primary sets. One set designated for
11 Bound Printed Matter and the other set for Media and Library Mail. In this
12 section I describe each set of spreadsheets.

13

14 **1. Bound Printed Matter Spreadsheets**

15 This set of spreadsheets consists of 28 workpapers (labeled WP-BPM-1 to
16 WP-BPM-28) plus a table of contents. These workpapers contain the
17 fundamental input assumptions and the calculations I employed to allocate
18 Bound Printed Matter costs; to develop per-piece and per-pound costs for each
19 Bound Printed Matter rate category; to mark up these cost elements to produce
20 preliminary rates; and to adjust these preliminary rates to produce my proposed
21 rates.

22

23 **2. Media Mail/Library Mail Spreadsheets**

24 This set of spreadsheets consists of 15 workpapers (labeled WP-MM-1 to
25 WP-MM-15) plus a table of contents. These workpapers contain the fundamental
26 input assumptions and the calculations I employed to allocate Media Mail and
27 Library Mail costs; to develop per-piece and per-pound costs for each Media Mail

1 and Library Mail rate category; to mark up these cost elements to produce
2 preliminary rates; and to adjust these preliminary rates to produce my proposed
3 rates.

4
5

6 **III. SUMMARY OF PROPOSED RATE AND CLASSIFICATION CHANGES**

7

8 **A. Bound Printed Matter**

9 The Postal Service proposes an average increase of 11.7 percent for
10 Bound Printed Matter (BPM), yielding a cost coverage of 124.9 percent. The
11 basic rate structure remains the same. The structure of discounts for drop-
12 shipped mail is maintained, with a passthrough of 100 percent, 85 percent and
13 80 percent of estimated cost savings for DBMC, DSCF and DDU, respectively.
14 The Carrier Route Presort discount is based on a passthrough of 100 percent of
15 estimated cost savings.

16

17 **B. Media Mail and Library Mail**

18 The Postal Service proposes to increase Media Mail rates by 17.9 percent
19 and Library Mail rates by 18.3 percent, with cost coverage of 109.0 percent for
20 the consolidated Media Mail-Library Mail product¹. The 5-Digit Presort discount is
21 based on a passthrough of 170 percent of estimated cost savings. The Basic
22 Presort Discount is based on a passthrough of 140 percent of estimated cost
23 savings.

24

¹ Media Mail and Library Mail costs are available only on a consolidated basis. Hence the cost coverage can only be calculated for the combined products.

1 IV. BOUND PRINTED MATTER

2 A. Product Description

3 Bound Printed Matter (BPM) is a subclass of Package Services mail. It
4 consists of catalogs, books, telephone directories, manuals and similar
5 permanently bound volumes that are printed, are not stationery, and that do not
6 have the nature of personal correspondence. Since Docket No. MC97-3, BPM
7 mail pieces may weigh up to 15 pounds. Mail sent using Bound Printed Matter
8 rates can also use Delivery Confirmation and Signature Confirmation services.

9 Bound Printed Matter has a non-presort rate category (currently called
10 Single-Piece) and two presort rate categories: Basic Presort and Carrier Route.
11 Within the presort categories the rates depend on whether the mail is deposited
12 at the destination BMC (DMBC), destination SCF (DSCF), the destination
13 delivery unit (DDU), or at some other entry unit.

14 The Bound Printed Matter subclass originated as a catalog subclass and
15 remained restricted to catalogs and similar bound advertising matter until Docket
16 No. MC73-1 broadened its eligibility to include bound printed matter other than
17 catalogs, although most books were still excluded. In the years following Postal
18 Reorganization, the rates for BPM and for Media Mail (formerly Special Rate
19 Fourth-Class Mail and then Special Standard Mail) evolved in such a way that, in
20 some instances, BPM rates became cheaper than the corresponding rates for
21 Media Mail (which was a preferred subclass). Many book publishers responded
22 to these rate differentials by including non-incidental advertising in books to make
23 them eligible for the cheaper BPM rates. In Docket No. R90-1, the Postal
24 Service sought to conform the subclass eligibility requirements to this reality.
25 The Commission agreed and extended eligibility for BPM rates to books without
26 advertising that otherwise met BPM standards.

1 The following section describes the rate and volume history of Bound
2 Printed Matter, including a description of the current rate structure.

3

4 **B. Rate and Volume History**

5 **1. Rates and Rate Design**

6 Since Postal Reorganization, Bound Printed Matter's fundamental rate
7 structure has consisted of a per-piece charge and a per-pound charge that varies
8 by distance between the origin and destination of the mail piece as measured by
9 zone. At the time of Postal Reorganization, there were two basic rate categories,
10 a single-piece rate and a bulk rate. In 1985, the bulk rate was separated into
11 Basic Presort and Carrier Route Presort rates. In Docket No. R97-1, a barcode
12 discount was introduced. This discount was available to properly prepared
13 parcels bearing a barcode with the correct destination ZIP Code. It was available
14 only to parcels that would normally be processed on the Postal Service's parcel
15 sorting equipment. In Docket No. R2000-1, the stand-alone Local rate and the
16 one-pound minimum weight requirement were eliminated. Three destination entry
17 discounts (for DBMC, DSCF and DDU entry) were introduced for presorted BPM.

18 In 2002, with the implementation of rates recommended by the
19 Commission in Docket No. R2001-1, BPM's rate design further changed in two
20 important ways:

- 21 • A flat differential was introduced to better align rates with costs. The flat
22 differential rate was based on an estimate that BPM flats save 7.7 cents
23 per-piece compared to parcels (and irregular pieces), reflecting delivery
24 cost savings.

- 1 • Barcode discounts of 3 cents per-piece were extended to automatable
2 BPM flats since this mail is processed on Postal Service flat sorting
3 machines.

4 In Docket No. R2005-1, BPM's rate structure was maintained without change.
5 I am proposing to maintain that rate structure, with a proposed change in name
6 of Single-Piece to Nonpresort, to better reflect a change in mail entry
7 regulations.²

8 Under the current rate design for Nonpresort BPM rates, the per-piece and
9 per-pound charges are combined into rate cells. Nonpresort rates have half-
10 pound weight increments from one to five pounds, and one-pound increments
11 thereafter. Presorted mail pays a per-piece charge and a per-pound charge
12 based on the total weight of the mail travelling to each zone. The Basic Presort
13 rates have lower per-piece and per-pound charges than Nonpresort rates do.
14 Additional discounts off the Basic Presort rates are available if the mail is sorted
15 to carrier routes, is barcoded, or is drop-shipped to a destination facility, though
16 not all worksharing discounts may be combined.

17 The detailed history of Bound Printed Matter rates from Postal
18 Reorganization to the present is contained in Library Reference USPS-LR-L-73.
19

² In order to reduce the complexity of retail transactions for customers and to simplify window service operations, the Postal Service intends to amend its regulations to require that Bound Printed Matter be paid either by customer-generated postage meter or by permit imprint. Acceptance of Nonpresort Bound Printed Matter will therefore remain available to both business and individual customers at collection points, with delivery/collection personnel, and at business mail entry units. As a result, at the retail window, clerks will describe to customers seeking to mail a large flat or parcel only the options they are most likely to use: Express Mail, Priority Mail, Parcel Post, and Media Mail (if eligible), all of which are easily distinguishable options from a retail customer's perspective.

1 **2. Volumes**

2 For the first several years after Postal Reorganization, Bound Printed
3 Matter volumes followed a generally declining trend. In 1977, that trend reversed
4 and, since then, BPM volumes have experienced robust growth, with year-to-
5 year volume declines in only four years. By FY 2005, BPM volumes had grown
6 to over five times what they were in 1972. Most of the growth occurred in the
7 worksharing categories. Consequently, Nonpresort BPM's volume share has
8 gradually shrunk, and in FY 2005 it was less than 5 percent of total volume.
9 Year-by-year volume details are shown in Library Reference USPS-LR-L-74.

10

11 **C. Proposed Changes to Rate Design**

12 In this docket, I propose to retain the current rate structure.³ Details of the
13 rate design are presented in Section D.

14

15 **D. Bound Printed Matter Rate Design**

16 My basic rate design continues the per-piece and per-pound zoned rate
17 structure that has been used for Bound Printed Matter in recent rate cases. First
18 I allocated total volume variable costs between weight-related and non-weight-
19 related costs, and between Nonpresort costs and Presorted mail costs. I used
20 the weight-related costs to produce the per-pound component of the rates, and
21 the non-weight-related costs to develop the per-piece component.

22 The details of my calculation of the piece and pound rate elements and
23 discounts are contained in my workpapers WP-BPM-12 through WP-BPM-14.

24

³ I am proposing non-substantive changes in the rate schedule titles and row labels where needed to make them consistent with the names of the categories as given in the DMCS ("Basic Presort" and "Carrier Route Presort").

1 **1. Pound Component**

2 Witness Mayes (USPS-T-25) has provided me with the estimated
3 transportation costs per pound by zone for both drop shipped and non-drop
4 shipped BPM⁴. I then include the standard two cents per pound allowance for
5 weight-related non-transportation costs between single piece and presort and by
6 zone and combined these costs with the transportation costs. I marked up the
7 combined weight-related costs per pound by a factor that reflected both the
8 contingency and the target cost coverage for BPM, provided by witness O'Hara
9 (USPS-T-31) to produce the preliminary pound charges for Basic Presort BPM
10 and for the three destination entry rate categories.

11 **2. Piece Component**

12 To derive the piece component I removed the transportation and non-
13 transportation weight-related costs from total costs. I apportioned these non-
14 weight-related costs between Nonpresort and Presorted costs, employing the
15 2-to-1 ratio for non-presort piece to presort unit non-transportation costs used by
16 the Postal Service and the Commission in all recent rate cases. I adjusted the
17 unit non-weight-related costs for revenue leakages and marked up the result by a
18 factor that reflected both the contingency and the target cost coverage for BPM,
19 provided by witness O'Hara (USPS-T-31), to produce the piece charges for
20 Nonpresort and Presorted BPM.

21 **3. Flats Rate Differential**

22 Since 2001, with the implementation of rates recommended by the
23 Commission in Docket No. R2001-1, Bound Printed Matter has had separate
24

⁴ The DBMC transportation cost for Zone 5 was inexplicably high. To avoid an anomaly in the rates, I used the Non-dropship Zone 5 transportation cost as a proxy for the DBMC Zone 5 transportation cost.

1 rates for flats and parcels. Witness Miller (USPS-T-20) reports that BPM flats
2 save 12.7 cents per piece compared to BPM parcels and irregular pieces. I
3 propose to pass along approximately 123 percent of witness Miller's estimated
4 cost savings through a lower per piece rate for BPM flats. This proposal will help
5 distinguish flats and parcels rates and aid in providing reasonable contributions
6 from both shapes.

7

8 **4. Discounts**

9 Bound Printed Matter currently has discounts available for barcoding,
10 carrier route presorting, and for drop shipping presorted mail.

11

12 *Barcoded mail.*

13 Witness Miller (USPS-T-20) reports a mail processing cost savings of 3.2
14 cents per piece on barcoded machinable parcels. I propose that machinable
15 BPM parcels that are part of a mailing of 50 or more BPM pieces and that bear a
16 correct readable barcode representing the 5-digit ZIP Code, as specified by the
17 Postal Service, receive a discount of three cents off the applicable Nonpresort or
18 Basic Presort per-piece rate.⁵ Consistent with current practice for Package
19 Services mail, this discount would be available only for mail that can take
20 advantage of the Postal Service's parcel sorting equipment capable of reading
21 barcodes. For this reason, the discount would not be available in conjunction
22 with the Carrier Route, DSCF or DDU discounts, or for DBMC mail that is entered
23 at an ASF other than the Phoenix, AZ ASF.

24

⁵ The 3.2 cents saving is rounded to the nearest cent to produce the three cent barcode discount for barcoded machinable parcels and barcoded automatable flats.

1 In 2002, with the implementation of rates recommended by the
2 Commission in Docket No. R2001-1, the barcode discount was extended to
3 automatable BPM flats. Witness Miller (USPS-T-20) reports a mail processing
4 cost savings of 3.2 cents per piece on barcoded automatable flats.⁶ I propose
5 that automatable BPM flats that are part of a mailing of 50 or more BPM flat-size
6 pieces and that bear a correct readable barcode representing the 5-digit ZIP
7 Code, as specified by the Postal Service, receive a discount of three cents off the
8 applicable Nonpresort or Basic Presort per-piece rate. This rate discount
9 represents a passthrough of 100 percent.

10
11 *Carrier Route Presort.*

12 Witness Miller (USPS-T-20) has estimated that carrier route presorting
13 saves 9.6 cents per piece in mail processing costs. I propose to pass through
14 100 percent of cost savings to properly prepared and entered mailings of at least
15 300 pieces that are sorted to carrier routes. This proposal translates to a discount
16 of 9.6 cents off the applicable rates.

17
18 *Destination entry rates.*

19 I subtracted witness Miller's estimates of per-piece cost savings for drop
20 shipped mail from the applicable presort per-piece charges to develop the
21 preliminary per-piece components of BPM's destination entry rates. I combined
22 these with the per-pound charges developed separately for drop shipped mail to
23 produce the preliminary drop ship rates.

24

⁶ Since there are no cost savings to be had from barcoding carrier route pieces, the automatable flats barcode discount would not be available for carrier route flats.

1 **E. Rate Adjustments**

2 In Docket No. R2000-1, the Postal Service introduced dropship discounts
3 for BPM. In the present case, I propose a 100 percent passthrough of cost
4 savings for DBMC, 85 percent for DSCF, and 80 percent for DDU. The lower
5 cost savings passthrough for DSCF and DDU help mitigate unacceptable rate
6 increases for non-dropshipped mail and maintain reasonable rate change
7 relationships. At the same time, these passthroughs are consistent with the
8 overall goal of improving the incentives for dropshipping as appropriate.

9

10 **F. Proposed Rates**

11 Attachment A shows the rates I am proposing for Nonpresort and
12 Presorted BPM. The Nonpresort rates in Attachment A are for machinable
13 parcels and irregular pieces only. The rates for Nonpresort flats are calculated
14 by deducting 16 cents from the Nonpresort rates. Presorted flats rates are 15.6
15 cents per piece less than the corresponding Presorted parcel/irregular-piece
16 rates (including drop-shipped and carrier route BPM).

17 Certain machinable parcels and automatable flats are also eligible for the
18 barcode discounts presented in the appropriate rate tables.

19

20 **G. Financial Impact of Rates**

21 Attachment B presents the financial impacts of the rates I propose. My
22 proposed rates would increase BPM average revenue per piece by 11.7 percent,
23 yielding a cost coverage of 124.9 percent. They will also help distinguish flats and
24 parcels rates and aid in providing reasonable contributions from both shapes. My
25 proposed discounts are consistent with the overall goal of improving the
26 incentives for dropshipping as appropriate.

1

2 **V. MEDIA MAIL AND LIBRARY MAIL**

3 **A. Product Description**

4 Media Mail and Library Mail are two Package Services subclasses that
5 have similar content restrictions and rate structures. Media Mail can contain
6 books, sound and video recordings, certain films and film catalogs, printed music,
7 certain test materials, play scripts and manuscripts, computer readable media,
8 and certain other qualified items. Library Mail is largely similar in content, but
9 also can contain other qualified items like bound volumes of academic theses,
10 scientific or mathematical kits, museum specimens, as well as other library and
11 museum materials.

12 An important distinction between the two subclasses is that only qualified
13 mailers may use Library Mail rates. To qualify, either the mailer or the recipient
14 must be a school, college, university, library, museum, herbarium, or be a
15 nonprofit organization as described in the Domestic Mail Manual, section E670.

16 By law, Media Mail and Library Mail rates are not zoned, and mail pieces
17 can range in weight from less than one pound up to 70 pounds. Most Media Mail
18 and Library Mail pieces consist of small parcels: half weigh less than one pound,
19 and 95 percent weigh less than six pounds. Mail sent using either Media Mail or
20 Library Mail rates can also use Delivery Confirmation and Signature Confirmation
21 services.

22 The following section describes the rate and volume history of Media Mail
23 and Library Mail, including a description of their current rate structures.

24

1 **B. Rate and Volume History**

2 **1. Rates and Rate Design**

3 At the time of Postal Reorganization, both Media Mail and Library Mail had
4 simple rate structures. Rates consisted of a two parts: one rate for the first
5 pound and a second, lower rate for each additional pound. Rates were unzoned,
6 reflecting Congressional mandate that the rates for these subclasses should not
7 vary by the distance transported.

8 In 1975 the rate structure of Media Mail (then called Special Rate Fourth-
9 Class Mail) was changed slightly to the three-part structure that exists today: one
10 rate for the first pound, a second rate for pounds two through seven, and the third
11 rate for each additional pound. In 1978, the same structure was instituted for
12 Library Mail.

13 The Postal Service began offering presort discounts to Media Mail
14 customers in 1978. Currently, properly prepared and sorted mailings of 500 or
15 more pieces of Media Mail are eligible for discounts depending on whether the
16 mail is sorted to the 5-digit destination ZIP Code level, or to the destination BMC.
17 Library Mail followed suit in January 1999, when, as a result of Docket No.
18 R97-1, the Media Mail and Library Mail schedules were effectively merged. In
19 addition to these presort discounts, properly prepared machinable parcels that
20 were part of a mailing of at least 50 pieces of Media Mail or 50 pieces of Library
21 Mail, and that bore a barcode with the correct destination ZIP Code were eligible
22 for a barcode discount. The discount was available only to parcels that would
23 normally be processed on the Postal Service's parcel sorting equipment.

24 Library Mail's status as a preferred, and historically subsidized, subclass
25 has complicated its rate history since Postal Reorganization. On several
26 occasions, Congress has attempted to develop mechanisms within the

1 framework of the postal ratemaking system that would retain Library Mail's status
2 as a preferred subclass, while ensuring that it would cover its costs. Most
3 recently, it became evident in Docket Nos. R97-1 and R2000-1 that the pricing
4 mechanism outlined in the Revenue Forgone Reform Act of 1993 could not
5 achieve these twin aims. At the request of mailers and the Postal Service,
6 Congress passed PL106-384 in 2000, which addressed pricing for Library Mail
7 and other nonprofit mail subclasses. Accordingly, Library Mail's rates are now
8 set to be, as nearly as practicable, five percent lower than the corresponding
9 Media Mail rates.

10 In 2002, with the implementation of rates recommended by the
11 Commission in Docket No. R2001-1, there were two relatively minor rate design
12 changes, both involving presort requirements:

- 13 • The Level B (BMC) Presort level was eliminated and replaced with a Basic
14 Presort level. The purpose of the change was to enable the Postal Service
15 to modify presort requirements for flat-shaped and non-machinable
16 Media/Library Mail to be compatible with current processing methods.
- 17 • The minimum presort volumes are reduced from 500 to 300 and the
18 separate minimums for each presort level are eliminated. This change
19 enabled mailers to satisfy the 300-piece minimum with a combination of
20 properly prepared and presorted 5-digit and Basic Presort volumes.

21 In Docket No. R2005-1, Media Mail and Library Mail rate structures were
22 maintained.

23 The detailed histories of Media Mail and Library Mail rates from Postal
24 Reorganization to the present are contained in Library Reference USPS-LR-L-73.

1 **2. Volumes**

2 In the years after Postal Reorganization both Media Mail and Library Mail
3 first experienced some volume growth, followed by decline. Media Mail reached
4 its peak volume in 1976 at 307 million pieces and then entered an extended
5 period of decline. This declining trend lasted up to 1990, with volumes falling
6 rapidly at first, then later at a slower pace. By 1990, Media Mail volume was less
7 than half of its 1976 peak. The trend then reversed itself and from 1990 through
8 2000, Media Mail saw a decade of generally rising volumes, although it still
9 remained far below its peak. Since then Media Mail volumes declined sharply in
10 2001 and recovered slowly to 180 million in 2005.

11 Library Mail volumes have demonstrated a similar trend of growth, decline,
12 and recovery, although the timing has differed. Library Mail reached its peak
13 volume in 1978 when 72 million pieces were sent. It then followed a generally
14 declining trend for the next two decades, reaching a low of 27 million pieces in
15 1997. From 1997 to 2000, there was a slow recovery up to just over 28 million
16 pieces in 2000. Since then, Library Mail volumes fell rapidly to 14 million pieces
17 in 2005. Year-by-year volume details for both Media Mail and Library Mail are
18 contained in Library Reference USPS-LR-L-74.

19

20 **C. Proposed Changes to Rate Design**

21 In this docket the Postal Service proposes no fundamental changes to the
22 Media Mail or Library Mail rate designs. Details of the rate design are presented
23 in Section D.

24

1 **D. Media Mail/Library Mail Rate Design**

2 With the passage of PL 106-384, Media Mail and Library Mail have been
3 effectively joined for rate-making purposes. The cost data for Media Mail and
4 Library Mail are reported on a consolidated basis. This means that in developing
5 rates, I have had to apportion costs and develop rate elements for the joint Media
6 Mail/Library Mail product before splitting them into separate rate elements for the
7 two subclasses. The rate design methodology follows the standard per-piece
8 and per-pound rate-development approach for the joint product up to the point of
9 splitting the rate elements.

10

11 **1. Pound Component**

12 I derived the per-pound component of the rate by allocating all
13 transportation costs (Cost Segment 14 plus piggybacked Segment 8) plus the
14 customary two-cent per pound add-on for weight-related non-transportation costs
15 to the total number of postage pounds. I allocated all other costs plus revenue
16 leakages to the per-piece component of the rate.

17 I calculated the per-pound charges by then dividing the total transportation
18 and non-transportation weight-related costs by the total postage pounds and
19 marking up these unit costs by a factor that reflected the contingency and target
20 markup for Media Mail/Library Mail provided by witness O'Hara (USPS-T-31). I
21 added these weight-related unit costs together to derive the preliminary per-
22 pound charge. Workpapers WP-MM-7 and WP-MM-10 contain the details of
23 these calculations.

24

25 **2. Piece Component**

26 To derive the piece component, I removed the transportation and non-
27 transportation weight-related costs from total costs and divided the result by the

1 total number of pieces. I marked up this unit cost by a factor that reflected the
2 contingency and target markup for Media Mail/Library Mail provided by witness
3 O'Hara (USPS-T-31) and added in the per-piece revenue leakages to produce
4 the preliminary per-piece charge. The detailed calculations are presented in
5 workpapers WP-MM-8 to WP-MM-10.

6

7

3. Discounts

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9

Media Mail and Library Mail currently have discounts available for
barcoding and presorting mail.

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Barcoded mail.

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Witness Miller (USPS-T-21) reports a mail processing cost savings of 3.2
cents per piece for barcoded machinable parcels. I propose that machinable
Media Mail and Library Mail parcels that are part of mailings of 50 or more pieces
of Media Mail or Library Mail, and that bear a correct readable barcode as
specified by the Postal Service, receive a discount of three cents off the
applicable Single-Piece or Basic Presort per-piece rate.⁷ This discount would not
be available for pieces entered at the 5-Digit Presort rate.

19

20

Presort Discounts.

21

22

23

24

25

In 2002, with the implementation of rates recommended by the
Commission Docket No. R2001-1, Media Mail and Library Mail became eligible
for two levels of presort discounts, 5-Digit Presort and Basic Presort. Witness
Miller (USPS-T-21) has estimated the cost savings for the Media/Library Mail
5-Digit Presort to be 46 cents, and for the Basic Presort to be 28 cents. In order

⁷ The 3.2 cents savings is rounded to the nearest cent to produce the three-cent barcode discount for barcoded machinable parcels and barcoded automatable flats.

1 to avoid unacceptable rate increases for presort mail I have passed 170 percent
2 of worksharing savings into discounts for 5-Digit Presort and 140 percent for
3 Basic Presort.

4

5 **E. Rate Adjustments**

6 *Splitting the Rate.*

7 After I developed the Single-Piece and Presort rate elements, I multiplied
8 them by de-averaging factors as shown in workpaper WP-MM-11. These factors
9 adjust the composite rate elements, based on the relative number of Media Mail
10 and Library Mail postage pounds in each rate category. Multiplying by the de-
11 averaging factors yields the Media Mail rate elements. The Library Mail rate
12 elements are then calculated by multiplying the Media Mail elements by 0.95, in
13 line with the statutory requirement.

14

15 **F. Proposed Rates**

16 Attachment C shows the rates I am proposing for Single-Piece and
17 Presorted Media Mail and Library Mail. Certain machinable parcels are also
18 eligible for the barcode discount of three cents per piece as described in the note
19 accompanying the rates table.

20

21 **G. Financial Impact of Rates**

22 Attachment D presents the financial impacts of the rates I propose. On a
23 consolidated basis, Media Mail-Library Mail average revenue per piece increases
24 by 17.9 percent, with a corresponding cost coverage of 109 percent. Following
25 the linking of Media Mail and Library Mail with the passage of PL106-384, costs
26 are available for these two products only on a consolidated basis. For this

1 reason the cost coverage is only calculated for the consolidated Media Mail-
2 Library Mail product.

3 The average revenue per piece for Media Mail will increase by 17.9
4 percent under my proposals. Library Mail rates are calculated as a 5 percent
5 discount off the corresponding Media Mail rates. On average, Library Mail
6 revenue per piece will increase 18.3 percent.

Proposed Nonpresort Parcels Rates ^[1]

Weight Not Over (lbs).							
	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1.0	\$2.12	\$2.16	\$2.22	\$2.30	\$2.37	\$2.45	\$2.61
1.5	\$2.12	\$2.16	\$2.22	\$2.30	\$2.37	\$2.45	\$2.61
2.0	\$2.21	\$2.27	\$2.35	\$2.45	\$2.55	\$2.65	\$2.87
2.5	\$2.31	\$2.38	\$2.48	\$2.61	\$2.73	\$2.86	\$3.13
3.0	\$2.40	\$2.49	\$2.61	\$2.76	\$2.91	\$3.06	\$3.39
3.5	\$2.50	\$2.60	\$2.74	\$2.92	\$3.09	\$3.27	\$3.65
4.0	\$2.59	\$2.71	\$2.87	\$3.07	\$3.27	\$3.47	\$3.91
4.5	\$2.69	\$2.82	\$3.00	\$3.23	\$3.45	\$3.68	\$4.17
5.0	\$2.78	\$2.93	\$3.13	\$3.38	\$3.63	\$3.88	\$4.43
6.0	\$2.97	\$3.15	\$3.39	\$3.69	\$3.99	\$4.29	\$4.95
7.0	\$3.16	\$3.37	\$3.65	\$4.00	\$4.35	\$4.70	\$5.47
8.0	\$3.35	\$3.59	\$3.91	\$4.31	\$4.71	\$5.11	\$5.99
9.0	\$3.54	\$3.81	\$4.17	\$4.62	\$5.07	\$5.52	\$6.51
10.0	\$3.73	\$4.03	\$4.43	\$4.93	\$5.43	\$5.93	\$7.03
11.0	\$3.92	\$4.25	\$4.69	\$5.24	\$5.79	\$6.34	\$7.55
12.0	\$4.11	\$4.47	\$4.95	\$5.55	\$6.15	\$6.75	\$8.07
13.0	\$4.30	\$4.69	\$5.21	\$5.86	\$6.51	\$7.16	\$8.59
14.0	\$4.49	\$4.91	\$5.47	\$6.17	\$6.87	\$7.57	\$9.11
15.0	\$4.68	\$5.13	\$5.73	\$6.48	\$7.23	\$7.98	\$9.63

Barcode Discount ^[2]

Automatable Flats \$0.03

Machinable Parcels \$0.03

Flats Differential^[3] \$0.16**Notes**

[1] Rate cells calculated as the sum of per-piece rate and the per-pound rate for each zone, times the number of pounds. Rates are for parcels/ipsps only. For flats, see Note [3], below.

[2] For eligible barcoded pieces, deduct the the appropriate Barcode Discount.

[3] Rates shown are for parcels/ipsps. For flats, subtract the Flats Differential from the rate shown in the table.

Bound Printed Matter

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Attachment A
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Proposed Basic Presort Rates ^{[1],[2]}

Weight Not Over (lbs).							
	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1.0	\$1.531	\$1.557	\$1.605	\$1.660	\$1.723	\$1.772	\$1.893
1.5	\$1.596	\$1.635	\$1.707	\$1.790	\$1.884	\$1.958	\$2.139
2.0	\$1.661	\$1.713	\$1.809	\$1.919	\$2.045	\$2.143	\$2.385
2.5	\$1.726	\$1.791	\$1.911	\$2.049	\$2.206	\$2.329	\$2.631
3.0	\$1.791	\$1.869	\$2.013	\$2.178	\$2.367	\$2.514	\$2.877
3.5	\$1.856	\$1.947	\$2.115	\$2.308	\$2.528	\$2.700	\$3.123
4.0	\$1.921	\$2.025	\$2.217	\$2.437	\$2.689	\$2.885	\$3.369
4.5	\$1.986	\$2.103	\$2.319	\$2.567	\$2.850	\$3.071	\$3.615
5.0	\$2.051	\$2.181	\$2.421	\$2.696	\$3.011	\$3.256	\$3.861
6.0	\$2.181	\$2.337	\$2.625	\$2.955	\$3.333	\$3.627	\$4.353
7.0	\$2.311	\$2.493	\$2.829	\$3.214	\$3.655	\$3.998	\$4.845
8.0	\$2.441	\$2.649	\$3.033	\$3.473	\$3.977	\$4.369	\$5.337
9.0	\$2.571	\$2.805	\$3.237	\$3.732	\$4.299	\$4.740	\$5.829
10.0	\$2.701	\$2.961	\$3.441	\$3.991	\$4.621	\$5.111	\$6.321
11.0	\$2.831	\$3.117	\$3.645	\$4.250	\$4.943	\$5.482	\$6.813
12.0	\$2.961	\$3.273	\$3.849	\$4.509	\$5.265	\$5.853	\$7.305
13.0	\$3.091	\$3.429	\$4.053	\$4.768	\$5.587	\$6.224	\$7.797
14.0	\$3.221	\$3.585	\$4.257	\$5.027	\$5.909	\$6.595	\$8.289
15.0	\$3.351	\$3.741	\$4.461	\$5.286	\$6.231	\$6.966	\$8.781

Barcode Discount ^[3]	
Automatable Flats	\$0.03
Machinable Parcels	\$0.03
Flats Differential ^[4]	\$0.156

Notes

[1] These amounts are correct for the corresponding weights.

[2] Rate cells calculated as the sum of per-piece rate and the per-pound rate for each zone, times the number of pounds. Rates are for parcels/ippes only. For flats, see Note [4], below.

[3] For eligible barcoded pieces, deduct the appropriate Barcode Discount.

[4] Rates shown are for parcels/ippes. For flats, subtract the Flats Differential from the rate shown in the table.

Proposed Basic Presort Destination Entry Rates ^{[1],[2]}

Weight Not Over (lbs).	DBMC/ASF Zone				DSCF	DDU
	Zones 1&2	Zone 3	Zone 4	Zone 5		
1.0	\$1.186	\$1.226	\$1.268	\$1.325	\$0.841	\$0.726
1.5	\$1.231	\$1.291	\$1.354	\$1.440	\$0.884	\$0.747
2.0	\$1.276	\$1.356	\$1.440	\$1.554	\$0.927	\$0.768
2.5	\$1.321	\$1.421	\$1.526	\$1.669	\$0.970	\$0.789
3.0	\$1.366	\$1.486	\$1.612	\$1.783	\$1.013	\$0.810
3.5	\$1.411	\$1.551	\$1.698	\$1.898	\$1.056	\$0.831
4.0	\$1.456	\$1.616	\$1.784	\$2.012	\$1.099	\$0.852
4.5	\$1.501	\$1.681	\$1.870	\$2.127	\$1.142	\$0.873
5.0	\$1.546	\$1.746	\$1.956	\$2.241	\$1.185	\$0.894
6.0	\$1.636	\$1.876	\$2.128	\$2.470	\$1.271	\$0.936
7.0	\$1.726	\$2.006	\$2.300	\$2.699	\$1.357	\$0.978
8.0	\$1.816	\$2.136	\$2.472	\$2.928	\$1.443	\$1.020
9.0	\$1.906	\$2.266	\$2.644	\$3.157	\$1.529	\$1.062
10.0	\$1.996	\$2.396	\$2.816	\$3.386	\$1.615	\$1.104
11.0	\$2.086	\$2.526	\$2.988	\$3.615	\$1.701	\$1.146
12.0	\$2.176	\$2.656	\$3.160	\$3.844	\$1.787	\$1.188
13.0	\$2.266	\$2.786	\$3.332	\$4.073	\$1.873	\$1.230
14.0	\$2.356	\$2.916	\$3.504	\$4.302	\$1.959	\$1.272
15.0	\$2.446	\$3.046	\$3.676	\$4.531	\$2.045	\$1.314

Barcode Discount ^[3]	
Automatable Flats	\$0.03
Machinable Parcels	\$0.03
Flats Differential ^[4]	\$0.156

Notes

- [1] These amounts are correct for the corresponding weights.
- [2] Rate cells calculated as the sum of per-piece rate and the per-pound rate for each zone, (if applicable), times the number of pounds.
Rates are for parcels/ippes only. For flats, see Note [4], below.
- [3] For eligible barcoded pieces, deduct the appropriate Barcode Discount.
- [4] Rates shown are for parcels/ippes. For flats, subtract the Flats Differential from the rate shown in the table.

Proposed Carrier Route Presort Rates ^{[1],[2]}

Weight Not Over (lbs).							
	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1.0	\$1.435	\$1.461	\$1.509	\$1.564	\$1.627	\$1.676	\$1.797
1.5	\$1.500	\$1.539	\$1.611	\$1.694	\$1.788	\$1.862	\$2.043
2.0	\$1.565	\$1.617	\$1.713	\$1.823	\$1.949	\$2.047	\$2.289
2.5	\$1.630	\$1.695	\$1.815	\$1.953	\$2.110	\$2.233	\$2.535
3.0	\$1.695	\$1.773	\$1.917	\$2.082	\$2.271	\$2.418	\$2.781
3.5	\$1.760	\$1.851	\$2.019	\$2.212	\$2.432	\$2.604	\$3.027
4.0	\$1.825	\$1.929	\$2.121	\$2.341	\$2.593	\$2.789	\$3.273
4.5	\$1.890	\$2.007	\$2.223	\$2.471	\$2.754	\$2.975	\$3.519
5.0	\$1.955	\$2.085	\$2.325	\$2.600	\$2.915	\$3.160	\$3.765
6.0	\$2.085	\$2.241	\$2.529	\$2.859	\$3.237	\$3.531	\$4.257
7.0	\$2.215	\$2.397	\$2.733	\$3.118	\$3.559	\$3.902	\$4.749
8.0	\$2.345	\$2.553	\$2.937	\$3.377	\$3.881	\$4.273	\$5.241
9.0	\$2.475	\$2.709	\$3.141	\$3.636	\$4.203	\$4.644	\$5.733
10.0	\$2.605	\$2.865	\$3.345	\$3.895	\$4.525	\$5.015	\$6.225
11.0	\$2.735	\$3.021	\$3.549	\$4.154	\$4.847	\$5.386	\$6.717
12.0	\$2.865	\$3.177	\$3.753	\$4.413	\$5.169	\$5.757	\$7.209
13.0	\$2.995	\$3.333	\$3.957	\$4.672	\$5.491	\$6.128	\$7.701
14.0	\$3.125	\$3.489	\$4.161	\$4.931	\$5.813	\$6.499	\$8.193
15.0	\$3.255	\$3.645	\$4.365	\$5.190	\$6.135	\$6.870	\$8.685

Flats Differential^[3] \$0.156

Notes

- [1] These amounts are correct for the corresponding weights.
- [2] Rate cells calculated as the sum of per-piece rate and the per-pound rate for each zone, times the number of pounds. Rates are for parcels/ipsps only. For flats, see Note [3], below.
- [3] Rates shown are for parcels/ipsps. For flats, subtract the Flats Differential from the rate shown in the table.

Proposed Carrier Route Presort Destination Entry Rates ^{[1],[2]}

Weight Not Over (lbs).	DBMC/ASF Zone				DSCF	DDU
	Zones 1&2	Zone 3	Zone 4	Zone 5		
1.0	\$1.090	\$1.130	\$1.172	\$1.229	\$0.745	\$0.630
1.5	\$1.135	\$1.195	\$1.258	\$1.344	\$0.788	\$0.651
2.0	\$1.180	\$1.260	\$1.344	\$1.458	\$0.831	\$0.672
2.5	\$1.225	\$1.325	\$1.430	\$1.573	\$0.874	\$0.693
3.0	\$1.270	\$1.390	\$1.516	\$1.687	\$0.917	\$0.714
3.5	\$1.315	\$1.455	\$1.602	\$1.802	\$0.960	\$0.735
4.0	\$1.360	\$1.520	\$1.688	\$1.916	\$1.003	\$0.756
4.5	\$1.405	\$1.585	\$1.774	\$2.031	\$1.046	\$0.777
5.0	\$1.450	\$1.650	\$1.860	\$2.145	\$1.089	\$0.798
6.0	\$1.540	\$1.780	\$2.032	\$2.374	\$1.175	\$0.840
7.0	\$1.630	\$1.910	\$2.204	\$2.603	\$1.261	\$0.882
8.0	\$1.720	\$2.040	\$2.376	\$2.832	\$1.347	\$0.924
9.0	\$1.810	\$2.170	\$2.548	\$3.061	\$1.433	\$0.966
10.0	\$1.900	\$2.300	\$2.720	\$3.290	\$1.519	\$1.008
11.0	\$1.990	\$2.430	\$2.892	\$3.519	\$1.605	\$1.050
12.0	\$2.080	\$2.560	\$3.064	\$3.748	\$1.691	\$1.092
13.0	\$2.170	\$2.690	\$3.236	\$3.977	\$1.777	\$1.134
14.0	\$2.260	\$2.820	\$3.408	\$4.206	\$1.863	\$1.176
15.0	\$2.350	\$2.950	\$3.580	\$4.435	\$1.949	\$1.218

Flats Differential^[3] \$0.156

Notes

- [1] These amounts are correct for the corresponding weights.
- [2] Rate cells calculated as the sum of per-piece rate and the per-pound rate for each zone, (if applicable), times the number of pounds.
Rates are for parcels/ipps only. For flats, see Note [3], below.
- [3] Rates shown are for parcels/ipps. For flats, subtract the Flats Differential from the rate shown in the table.

Bound Printed Matter Financial Summary

	Volume	Cost	Revenue	Cost Coverage	Cost Per Piece	Revenue Per Piece	Contribution Per Piece
Before Rates	648,784,885	\$623,754,111	\$699,748,142	112.2%	\$0.96	\$1.08	\$0.12
After Rates	654,853,183	\$631,391,505	\$788,780,081	124.9%	\$0.96	\$1.20	\$0.24
Per Piece Changes					0.3%	11.7%	105.2%

Media Mail and Library Mail

USPS-T-38
Attachment C

Proposed Rates

Weight Not Over (lbs.)	Media Mail Proposed Rates			Library Mail Proposed Rates			
	Single- Piece Rate	5-Digit Presort Rate	Basic Presort Rate	Single- Piece Rate	5-Digit Presort Rate	Basic Presort Rate	
1	\$2.09	\$1.30	\$1.69	\$1.99	\$1.24	\$1.61	
2	\$2.47	\$1.68	\$2.07	\$2.35	\$1.60	\$1.97	
3	\$2.85	\$2.06	\$2.45	\$2.71	\$1.96	\$2.33	
4	\$3.23	\$2.44	\$2.83	\$3.07	\$2.32	\$2.69	
5	\$3.61	\$2.82	\$3.21	\$3.43	\$2.68	\$3.05	
6	\$3.99	\$3.20	\$3.59	\$3.79	\$3.04	\$3.41	
7	\$4.37	\$3.58	\$3.97	\$4.15	\$3.40	\$3.77	
8	\$4.75	\$3.96	\$4.35	\$4.51	\$3.76	\$4.13	
9	\$5.13	\$4.34	\$4.73	\$4.87	\$4.12	\$4.49	
10	\$5.51	\$4.72	\$5.11	\$5.23	\$4.48	\$4.85	
11	\$5.89	\$5.10	\$5.49	\$5.59	\$4.84	\$5.21	
12	\$6.27	\$5.48	\$5.87	\$5.95	\$5.20	\$5.57	
13	\$6.65	\$5.86	\$6.25	\$6.31	\$5.56	\$5.93	
14	\$7.03	\$6.24	\$6.63	\$6.67	\$5.92	\$6.29	
15	\$7.41	\$6.62	\$7.01	\$7.03	\$6.28	\$6.65	
16	\$7.79	\$7.00	\$7.39	\$7.39	\$6.64	\$7.01	
17	\$8.17	\$7.38	\$7.77	\$7.75	\$7.00	\$7.37	
18	\$8.55	\$7.76	\$8.15	\$8.11	\$7.36	\$7.73	
19	\$8.93	\$8.14	\$8.53	\$8.47	\$7.72	\$8.09	
20	\$9.31	\$8.52	\$8.91	\$8.83	\$8.08	\$8.45	
21	\$9.69	\$8.90	\$9.29	\$9.19	\$8.44	\$8.81	
22	\$10.07	\$9.28	\$9.67	\$9.55	\$8.80	\$9.17	
23	\$10.45	\$9.66	\$10.05	\$9.91	\$9.16	\$9.53	
24	\$10.83	\$10.04	\$10.43	\$10.27	\$9.52	\$9.89	
25	\$11.21	\$10.42	\$10.81	\$10.63	\$9.88	\$10.25	
26	\$11.59	\$10.80	\$11.19	\$10.99	\$10.24	\$10.61	
27	\$11.97	\$11.18	\$11.57	\$11.35	\$10.60	\$10.97	
28	\$12.35	\$11.56	\$11.95	\$11.71	\$10.96	\$11.33	
29	\$12.73	\$11.94	\$12.33	\$12.07	\$11.32	\$11.69	
30	\$13.11	\$12.32	\$12.71	\$12.43	\$11.68	\$12.05	
31	\$13.49	\$12.70	\$13.09	\$12.79	\$12.04	\$12.41	
32	\$13.87	\$13.08	\$13.47	\$13.15	\$12.40	\$12.77	
33	\$14.25	\$13.46	\$13.85	\$13.51	\$12.76	\$13.13	
34	\$14.63	\$13.84	\$14.23	\$13.87	\$13.12	\$13.49	
35	\$15.01	\$14.22	\$14.61	\$14.23	\$13.48	\$13.85	
36	\$15.39	\$14.60	\$14.99	\$14.59	\$13.84	\$14.21	
37	\$15.77	\$14.98	\$15.37	\$14.95	\$14.20	\$14.57	
38	\$16.15	\$15.36	\$15.75	\$15.31	\$14.56	\$14.93	
39	\$16.53	\$15.74	\$16.13	\$15.67	\$14.92	\$15.29	
40	\$16.91	\$16.12	\$16.51	\$16.03	\$15.28	\$15.65	
41	\$17.29	\$16.50	\$16.89	\$16.39	\$15.64	\$16.01	
42	\$17.67	\$16.88	\$17.27	\$16.75	\$16.00	\$16.37	
43	\$18.05	\$17.26	\$17.65	\$17.11	\$16.36	\$16.73	
44	\$18.43	\$17.64	\$18.03	\$17.47	\$16.72	\$17.09	
45	\$18.81	\$18.02	\$18.41	\$17.83	\$17.08	\$17.45	
46	\$19.19	\$18.40	\$18.79	\$18.19	\$17.44	\$17.81	
47	\$19.57	\$18.78	\$19.17	\$18.55	\$17.80	\$18.17	
48	\$19.95	\$19.16	\$19.55	\$18.91	\$18.16	\$18.53	
49	\$20.33	\$19.54	\$19.93	\$19.27	\$18.52	\$18.89	
50	\$20.71	\$19.92	\$20.31	\$19.63	\$18.88	\$19.25	
51	\$21.09	\$20.30	\$20.69	\$19.99	\$19.24	\$19.61	
52	\$21.47	\$20.68	\$21.07	\$20.35	\$19.60	\$19.97	
53	\$21.85	\$21.06	\$21.45	\$20.71	\$19.96	\$20.33	
54	\$22.23	\$21.44	\$21.83	\$21.07	\$20.32	\$20.69	
55	\$22.61	\$21.82	\$22.21	\$21.43	\$20.68	\$21.05	
56	\$22.99	\$22.20	\$22.59	\$21.79	\$21.04	\$21.41	
57	\$23.37	\$22.58	\$22.97	\$22.15	\$21.40	\$21.77	
58	\$23.75	\$22.96	\$23.35	\$22.51	\$21.76	\$22.13	
59	\$24.13	\$23.34	\$23.73	\$22.87	\$22.12	\$22.49	
60	\$24.51	\$23.72	\$24.11	\$23.23	\$22.48	\$22.85	
61	\$24.89	\$24.10	\$24.49	\$23.59	\$22.84	\$23.21	
62	\$25.27	\$24.48	\$24.87	\$23.95	\$23.20	\$23.57	
63	\$25.65	\$24.86	\$25.25	\$24.31	\$23.56	\$23.93	
64	\$26.03	\$25.24	\$25.63	\$24.67	\$23.92	\$24.29	
65	\$26.41	\$25.62	\$26.01	\$25.03	\$24.28	\$24.65	
66	\$26.79	\$26.00	\$26.39	\$25.39	\$24.64	\$25.01	
67	\$27.17	\$26.38	\$26.77	\$25.75	\$25.00	\$25.37	
68	\$27.55	\$26.76	\$27.15	\$26.11	\$25.36	\$25.73	
69	\$27.93	\$27.14	\$27.53	\$26.47	\$25.72	\$26.09	
70	\$28.31	\$27.52	\$27.91	\$26.83	\$26.08	\$26.45	
Barcode Discount ^[1]		\$0.03					
Notes: [1] For eligible barcoded pieces, deduct the appropriate Barcode Discount.							

Media Mail/Library Mail Financial Summary

		Volume ^[1] [A]	Cost ^[2] [B]	Revenue ^[3] [C]	Cost Coverage ^[4] [D]	Cost Per Piece ^[5] [E]	Revenue Per Piece ^[6] [F]	Contribution Per Piece ^[7] [G]
	Consolidated							
[a]	Before Rates	179,430,361	\$416,715,135	\$386,346,361	92.7%	\$2.32	\$2.15	-\$0.17
[b]	After Rates	165,984,011	\$386,613,640	\$421,313,073	109.0%	\$2.33	\$2.54	\$0.21
[c]	Per Piece Changes					0.3%	17.9%	-223.5%
	Media Mail							
[d]	Before Rates	166,139,356	---	\$358,092,543	---	---	\$2.16	---
[e]	After Rates	153,731,482	---	\$390,512,334	---	---	\$2.54	---
[f]	Per Piece Changes						17.9%	
	Library Mail							
[g]	Before Rates	13,291,005	---	\$28,253,818	---	---	\$2.13	---
[h]	After Rates	12,252,529	---	\$30,800,739	---	---	\$2.51	---
[j]	Per Piece Changes						18.3%	