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

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

TESTIMONY
OF
CARL G. DEGEN
ON BEHALF OF THE
UNITED STATES POSTAL SERVICE

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Direct Testimony
of
Carl G. Degen

AUTOBIOGRAPHICAL SKETCH

1 My name is Carl G. Degen. I am Senior Vice President of Christensen
2 Associates, which is an economic research and consulting firm located in Madison,
3 Wisconsin. My education includes a B.S. in mathematics and economics from the
4 University of Wisconsin-Parkside and an M.S. in economics from the University of
5 Wisconsin-Madison. I earned an M.S. by completing the coursework and qualifying
6 exams for a Ph.D., but did not complete a dissertation. While a graduate student, I
7 worked as a teaching assistant for one year and a research assistant for two years. In
8 1980 I joined Christensen Associates as an Economist, and was promoted to Senior
9 Economist in 1990 and Vice President in 1992. In 1997 I became Senior Vice
10 President.

11 During my tenure at Christensen Associates I have worked on research
12 assignments including productivity measurement in transportation industries and the
13 U.S. Postal Service. I have also provided litigation support and expert testimony for a
14 number of clients. In R94-1, I gave testimony before the Postal Rate Commission on
15 the reclassification of second-class in-county tallies for the In-Office Cost System. In
16 MC95-1, I gave direct testimony on letter bundle handling productivities and the
17 makeup of First-Class presort mailings. I also gave rebuttal testimony on savings from
18 automation, the demand for greeting cards, and analysis of qualifiers for the proposed
19 Publications Service subclass. In MC96-2, I gave testimony regarding corrections to

- 1 Periodicals-Classroom unit costs, the associated standard errors, and possible
- 2 changes to the sampling system.

1 I. PURPOSE AND SCOPE

2 My testimony focuses on the In-Office Cost System (IOCS), which is used to
3 estimate costs for time spent by various types of employees performing different
4 functions. The IOCS is also used to distribute some of these costs to class of mail. I
5 will explain the basic design of this statistical system and how the functional separation
6 and cost distribution are obtained. I will also explain changes that have been made to
7 the method of cost distribution for mail processing, cost component 3.1.

8

9 II. THE IN-OFFICE COST SYSTEM

10 The Postal Service accounting systems cannot identify labor costs by subclass
11 of mail because employees are simultaneously processing more than one subclass in
12 most operations. The IOCS is designed to supplement the accounting system data by
13 sampling employees at randomly selected points in time. When an employee is
14 sampled, the activity of the employee at that point in time is recorded. If the employee
15 is handling mail when sampled, the data collector records information regarding the
16 type or types of mail being handled.

17 The selection of employees to be sampled is based on a stratified sample within
18 Cost Ascertainment Group (CAG)¹ for each of five craft groups, which are sampled
19 independently: (1) clerks, (2) mailhandlers, (3) city carriers, (4) special delivery
20 messengers, and (5) supervisors.

¹ Some CAG A offices are treated as CAG B, and BMCs are a separate group.

1 When an employee's activity is observed, data are entered directly into portable
2 microcomputers under Computerized On-Site Data Entry System (CODES). Users
3 guides, handbooks, other field operating instructions, and information on the CODES
4 software are contained in Library References H-48 and H-49. Details of the IOCS
5 sample design are in Library Reference H-89.

6 The results of the IOCS sampling are costs by function for each craft group.
7 Proportions of tallies are applied to labor costs by CAG from the accounting system to
8 obtain estimates of labor costs by craft and function. Table 1 shows the confidence
9 limits for the estimates for FY 1996 by craft by function.

10 For two of the functions shown in Table 1, the IOCS is also used to distribute
11 those costs to class of mail. The functions using IOCS distribution are:
12 (1) Mail Processing and Window Service labor by Clerks and Mailhandlers in CAG A-J
13 offices, and (2) City Carriers In-Office Direct Labor. The distribution to subclass of mail
14 follows the same method as distribution to function. Proportions of tallies are applied to
15 cost totals by CAG and cost estimates are obtained by summing over CAGs. Tables 2
16 and 3 show the confidence limits for the cost distribution to classes of mail and
17 functions. The calculation of the confidence limits shown in Tables 1, 2 and 3 is
18 described in Library Reference H-146.

1 III. REVISIONS TO THE MAIL PROCESSING COMPONENT (3.1)

2 When an IOCS data collector is asked to sample a worker at a specific time, the
3 worker may or may not be handling mail. In some cases, the worker may be observed
4 handling a single piece of mail or a number of pieces which are identical except for the
5 delivery address. The key thing is that a single subclass of mail is observed. This
6 sample outcome is referred to as a direct tally.² Alternately, the worker could be on
7 break, between handlings, or monitoring the operation of equipment. Even when a
8 worker is handling mail, it may be a "container" or "item"³ with many kinds of mail in it.
9 These sample outcomes are referred to as not-handling-mail and mixed-mail tallies,
10 respectively.

11

12 Previous Methodology

13 In the mail processing cost distribution process used for previous proceedings,
14 tallies are assigned a dollar value by dividing total clerk and mailhandler
15 compensation⁴ for a CAG by the number of tallies obtained for that CAG. Within each
16 CAG, the tally dollars are grouped into pools of direct tallies, mixed-mail tallies, and
17 not-handling-mail tallies. The direct tally dollars can be partitioned by subclass of mail
18 because each direct tally is associated with a unique subclass.

² Additionally, the "top piece rule" provides a procedure by which a single subclass is associated with the handling of a collection of non-identical mail, creating a direct tally.

³ In this context, "container" refers to rolling stock such as APCs, OTRs, and hampers. "Items" include sacks of various colors, bundles, trays, and pallets.

⁴ Salary and benefits from the Pay Data System.

1 The mixed-mail tallies are separated into groups based on the subclasses and
2 shapes of mail the data collector observes in the sampled container or item. For
3 example, the most general group is all classes, all shapes. There are also detailed
4 mixed-mail categories for specific shapes and individual classes. When data collectors
5 record a tally, they record the "basic function" being performed based on the
6 mailstream involved. The basic functions are outgoing, incoming, transit, and other.
7 Mixed-mail costs are distributed to subclass in proportion to direct costs within CAG
8 and basic function. Mixed-mail tallies associated with specific classes or shapes are
9 distributed to subclass in proportion to the appropriate subset of direct costs. For
10 instance, a mixed-letters tally is distributed to subclass using only direct tallies handling
11 letters. The mixed-mail distribution process is generally referred to as LIOCATT, for
12 the name of the principal program used to accomplish the algorithm. The sum of direct
13 costs plus distributed mixed-mail cost is the Mail Processing Direct Labor portion of
14 cost component 3.1.

15 Most not-handling-mail tallies represent activities which are considered
16 overhead to mail processing and are classified as 100% volume variable. These not-
17 handling-mail dollars are distributed to subclass in proportion to the Mail Processing
18 Direct Labor costs. In the Cost Segments and Components Report, these costs are
19 reported as the Mail Processing Overhead portion. Finally, some not-handling-mail
20 activities, in particular certain Platform acceptance activities, are classified as
21 institutional. These costs are reported as the Mail Processing Fixed portion.

1 Revised Methodology

2 The methodology described above for the estimation of mail processing costs for
3 clerks and mailhandlers in CAG A-J offices has been criticized by intervenors and the
4 Postal Rate Commission in past cases. The criticisms generally fall into three areas:
5 1) the increase in not-handling-mail tallies, 2) the methods used to distribute mixed-
6 mail costs, and 3) the assumption that mail processing direct labor and overhead costs
7 are 100 percent volume variable.⁵

8 In response to these criticisms, the Postal Service has revised the mail
9 processing (component 3.1) cost methodology in three significant ways. First, the
10 hours data from the Management Operating Data System (MODS)⁶ are used to partition
11 the Pay Data System compensation totals into cost pools based on mail processing
12 activities and machinery types. Second, the mixed-mail cost distributions have been
13 refined by incorporating IOCS data on container contents, and confining mixed-mail
14 distributions to direct tallies associated with the same cost pool.⁷ Third, variability
15 estimates are developed for each of the pools. These revisions squarely address each
16 of the past criticisms listed above. I believe these revisions result in more accurate
17 estimates of attributable cost.

18 The new methodology for component 3.1 begins with clerk and mailhandler

⁵ Note that certain mail processing costs have been classified as institutional and assigned to the "mail processing fixed" component of cost segment 3.1. See Library Reference H-1.

⁶ See USPS-T-4 for a description of MODS.

⁷ The exception is Platform mixed-mail costs, which are distributed on direct tallies in all allied operations.

1 compensation from the Pay Data System just as the old methodology did. The clerk
2 and mailhandler compensation is divided first into totals for three office groups: offices
3 which report to MODS (MODS offices), other CAG A-J offices (non-MODS offices), and
4 BMCs. Costs for the MODS offices are further partitioned by Labor Distribution Code
5 (LDC).⁸ MODS workhours are then used to partition the LDC totals to MODS operation
6 code totals. The cost pools for the MODS office group are defined as collections of
7 related MODS operation codes. The definition of the cost pools began with ranges of
8 operation codes that are consistently defined at the national level.⁹ The groups of
9 operation codes were further aggregated until they were large enough to have
10 sufficient tallies in each for estimation of a distribution key but preserved a meaningful
11 homogeneity of the operations.¹⁰ The MODS-based partition of Segment 3 costs into
12 the mail processing, administrative, and window service components for the MODS
13 office group does not correspond exactly to the partition based on IOCS operation
14 codes¹¹ in the old methodology. That is, all activities of an employee clocked into a
15 mail processing MODS operation are counted as part of that mail processing operation,

⁸ Labor Distribution Codes are used to aggregate hours and compensation into operational/functional groups. LDCs are generally associated with the National Workhour Reporting system. Each MODS operation code is associated with an LDC, but represents a finer level of disaggregation; see Library Reference H-146.

⁹ Within some ranges of operation codes, individual offices have some discretion over operation definitions.

¹⁰ Examples of the cost pools are OCR operations, BCS operations, FSM operations, manual letters, and manual flats. The detailed mapping of MODS operation codes to cost pools is contained in Library Reference H-146.

¹¹ For the clerk and mailhandler crafts, the IOCS operation codes identify certain mail processing, administrative, and window service functions at a relatively high level of aggregation. IOCS operation codes should not be confused with MODS operation codes.

1 even if the data collector observed the employee working somewhere else. From the
2 viewpoint of the old methodology, some activities (as defined by IOCS) would appear to
3 have "migrated" between cost components. In the new methodology, however, the
4 main concern is identifying the activities actually performed by the employees clocked
5 into the operations in a cost pool in order to ensure an accurate distribution of those
6 costs. The compensation totals for the BMC and non-MODS groups are partitioned
7 into the mail processing, administrative, and window service components using IOCS
8 dollar totals for the collections of IOCS operation codes that defined the components in
9 the old methodology. The BMC mail processing component is further subdivided into
10 cost pools for activities and machinery types using the distribution of IOCS dollars for
11 selected activity and machinery types, as identified in IOCS Questions 18 and 19.¹²
12 The mail processing component for the non-MODS group is partitioned into pools for
13 the four basic functions using IOCS costs.

14 The tallies from IOCS are assigned dollar values based on compensation totals
15 for their respective strata and cost pool. For the non-MODS office group, the cost pool
16 is simply the tally's basic function. The BMC cost pool assignments are identical to
17 those used to partition the mail processing dollars into cost pools. Tallies taken at
18 MODS offices are assigned to cost pools using the following criteria. If the tally

¹² Questions 18 & 19 refer to questions in the CODES software for IOCS data collection. These questions ask the data collector to report the nature of the activity being performed by the sampled worker. The BMC variabilities are estimated using data from the Productivity Information Reporting System (PIRS). The IOCS responses used to form the cost pools were designed for consistency with the PIRS operations underlying the variabilities.

1 contains a valid MODS operation code, the cost pool associated with that code is
2 assigned.¹³ If the MODS code is invalid or missing, combinations of IOCS question 18
3 and 19 responses which correspond to certain MODS cost pools are used to make an
4 assignment if possible. Finally, if question 18 and 19 responses are not available or
5 not relevant, the IOCS operation code is used to associate tallies with certain mail
6 processing pools.¹⁴

7 For each of the cost pools, a variability percentage has been estimated by
8 witness Bradley. The testimony of witness Bradley describes the data and estimation
9 procedures used. When a cost pool has a pool-specific workload measure¹⁵ its
10 variability is estimated using a regression model. MODS operating procedures
11 mandate collection of workload measures for distribution and mail preparation
12 operations. Allied operation variabilities are also computed using a regression
13 procedure, but use only volumes in direct distribution operations as a proxy for allied
14 operation workload.¹⁶ Similar procedures are employed for the BMC cost pools. For
15 cost pools without available workload measures, the estimate of variability is formed
16 using one or more of the variabilities for related cost pools. The basic function pools
17 for Non-MODS offices are treated as a single cost pool to which the overall variability of

¹³ The exception is the LDC 15 (RBCS) pool. This cost pool uses direct tallies in MODS operations 971-978 (BCS/OSS) to form the distribution factors, since IOCS does not sample activities at Remote Encoding Centers. An LDC 15 distribution methodology based on sampled RBCS images is under development but was not available for inclusion in this filing.

¹⁴ See Library Reference H-146 for the SAS source code which associates the IOCS clerk and mailhandler tallies with the mail processing cost pools.

¹⁵ The workload measures are Total Piece Handlings from MODS.

¹⁶ Workload data for allied operations are being collected but are not available for inclusion in this filing.

1 MODS office costs is applied. The variability percentages are applied to each cost
2 pool to obtain an estimate of variable costs.

3 The distribution of volume variable costs to subclass is accomplished by
4 developing a distribution factor for each subclass within each cost pool. The
5 distribution key is the percentages of cost by subclass using IOCS direct costs, plus a
6 distribution to subclass of the cost pool's mixed-mail costs. Direct costs include costs
7 for counted mixed-mail items, as well as items and containers which contain identical
8 mail or which are subject to the top piece rule. Counted mixed-mail items, identical
9 mail items, and items subject to the top piece rule are collectively referred to as direct
10 items. Uncounted mixed-mail costs are distributed in proportion to direct-item costs of
11 the same type in the cost pool. If there are no direct items of the same type in the cost
12 pool, the distribution of direct-item costs of the same type across all cost pools is
13 employed.

14 Mixed-mail containers are distributed one of two ways. For a majority of
15 containers, the data collector recorded the percentage of the container's volume (cube)
16 occupied by shapes of loose mail and/or items. These are referred to as identified
17 containers and the recorded percentages are used to partition the tally dollars by loose
18 shape and item type. The partitioned dollars are then distributed to subclass using the
19 corresponding piece- or item-handling distribution, including, in the latter case,
20 distributed mixed-mail items. The identified container distributions are formed within

1 cost pools.¹⁷ Costs for containers for which the contents were not identified are
2 distributed to subclass in proportion to direct-container costs plus identified container
3 costs of the same type.

4 The revised approach is a considerable refinement of the existing mixed-mail
5 methodology for several reasons. It exploits the association of item types with certain
6 shapes and/or subclasses of mail, in effect using item types as mixed-mail categories.
7 For containers with more than one shape of mail or item type, it weights the direct
8 distributions based on the observed container contents. In contrast, the LIOCATT
9 mixed-mail method assumes that containers with mixed shapes of mail contain the
10 shapes in the proportions of the appropriate direct tallies outside of containers. Finally,
11 it allows for a continuum of mixed-mail categories for identified containers, defined by
12 what data collectors observe in the field.

13 The cost pools are defined to include volume-variable overhead costs. These
14 costs are distributed to subclass using a distribution of the not-handling-mail costs
15 associated with the cost pools. For most cost pools, the distribution is in proportion to
16 the direct costs plus distributed mixed-mail costs within the cost pool where they are
17 incurred. Special service activity codes are excluded from these distributions. There
18 are a number of exceptions in which not-handling-mail costs are distributed to special
19 services and also direct costs and distributed mixed-mail costs are aggregated over

¹⁷ For the MODS platform pool, container distributions are based on piece and item distributions in all allied labor pools. The container distributions for the BMC platform pool are based on piece and item distributions in all BMC pools.

1 groups of cost pools. For example, not-handling-mail costs in the Empty Equipment
2 cost pool are distributed in proportion to the direct plus distributed mixed-mail costs in
3 all MODS 1 & 2 cost pools, and the distribution includes the special services activity
4 codes. See Library Reference H-146 for full details.

5 Table 4 shows the cost pools formed from the Pay Data system and the
6 estimated variable costs corresponding to each pool. Table 5 shows the distribution of
7 variable costs to subclass by cost pool. Table 6 shows the confidence limits by direct
8 cost category for the new method. Further details of the revised methodology and the
9 calculation of confidence limits are contained in Library Reference H-146.

**Table 1: FY 1996 Estimated IOCS Costs and Associated Confidence Limits
By Craft/Function**

Function by Craft	Est. Cost	Est. Coefficient of Variation	Lower 95% Confidence Limit	Upper 95% Confidence Limit
CLERKS & MAILHANDLERS				
Mail Processing Direct Labor				
Direct Mail	6,077,919	0.39%	6,031,643	6,124,194
Mixed Mail	2,670,527	0.52%	2,643,372	2,697,682
Mail Proc. Fixed & Var. Ovhd	3,306,638	0.47%	3,276,286	3,336,990
Window Service	1,737,838	1.03%	1,702,744	1,772,931
Administration				
Time and Attendance	241,447	1.91%	232,431	250,463
Other incl. Claims & Inquiries	1,975,824	0.74%	1,947,323	2,004,325
TOTAL	16,010,192			
CITY CARRIERS				
In-Office Direct Labor	3,111,318	0.80%	3,062,484	3,160,153
Training, Vehicle Prep.	245,838	3.14%	230,721	260,956
In-Office Support	575,808	1.90%	554,367	597,249
Street	7,527,754	0.34%	7,477,780	7,577,729
TOTAL	11,460,719			
SPECIAL DELIVERY MSGRS.				
Street Time	85,476	1.33%	83,249	87,704
Other	19,306	5.89%	17,079	21,534
TOTAL	104,783			
SUPERVISORS/TECH. ADM.				
Mail Processing	947,358	1.00%	928,720	965,995
Central Mail Mark-up	39,053	5.04%	35,198	42,908
Window Service	118,022	3.81%	109,211	126,834
Administrative and Support	28,951	6.95%	25,008	32,894
City Delivery Carriers	417,115	2.00%	400,735	433,495
Special Delivery Messengers	5,296	12.52%	3,996	6,595
Rural Delivery Carriers	10,970	12.86%	8,205	13,735
Vehicle Service	39,775	4.44%	36,317	43,234
Higher Level Supervisors	183,037	2.86%	172,781	193,293
Gen. Supv.: Mail Processing	975	29.13%	418	1,531
Gen. Supv.: Collection/Delivery	430	38.05%	109	751
Supervisor Training	57,329	4.58%	52,183	62,476
Quality Control/Revenue Prot.	32,875	5.12%	29,575	36,175
Supv. of mixed Clerk/Mh actv.	98,035	4.23%	89,908	106,161
Supv. of one or more crafts	458,272	2.72%	433,800	482,743
Other	715,060	1.52%	693,727	736,392
TOTAL	3,152,552			

**Table 2: FY 1996 Clerks and Mailhandlers – Mail Processing
Estimated Costs and Associated Confidence Limits By Direct Cost Category (OLD methodology)**

Direct Cost Category	Est. Cost	Est. Coefficient of Variation	Lower 95% Confidence Limit	Upper 95% Confidence Limit
First Class				
Letters and Parcels	2,848,071	0.59%	2,815,317	2,880,824
Private Mailing Cards	90,701	2.92%	85,519	95,883
Postal Cards	1,914	20.18%	1,157	2,671
Presort Letters and Parcels	616,490	1.20%	601,937	631,042
Presort Cards	23,057	5.82%	20,425	25,689
Priority	264,768	1.83%	255,279	274,258
Express	62,632	3.86%	57,893	67,371
Second Class				
Within County	9,525	13.48%	7,008	12,042
Outside County - Non Profit	44,430	4.38%	40,615	48,244
Outside County - Classroom	2,485	32.61%	896	4,073
Outside County - Regular	244,398	1.83%	235,630	253,165
Third Class				
Third Single Piece Rate	45,958	3.99%	42,367	49,549
Bulk - Regular Carrier Route	144,856	2.50%	137,761	151,951
Bulk - Regular 5-Digit	878,996	0.96%	862,510	895,481
Bulk - Non Profit Carrier Route	15,565	6.90%	13,460	17,670
Bulk - Non Profit 5-Digit	212,502	1.86%	204,747	220,257
Fourth Class				
Parcels - Zone Rate	81,349	2.85%	76,812	85,885
Bound Printed Matter	38,043	4.32%	34,822	41,264
Special Rate	40,228	3.95%	37,113	43,344
Library Rate	8,503	9.00%	7,003	10,002
Mailgrams	62	97.72%	-57	182
Free for Blind/Handicapped	5,305	11.18%	4,142	6,467
International	123,044	3.40%	114,832	131,255
USPS	58,692	3.88%	54,226	63,158
Registry	73,946	3.55%	68,802	79,089
Certified	51,439	4.48%	46,918	55,961
Insurance	8,082	12.36%	6,123	10,040
COD	4,859	16.40%	3,297	6,421
Special Delivery	974	26.57%	467	1,482
Other Special Services	77,047	3.32%	72,039	82,054
Mixed Mail	2,670,527	0.52%	2,643,372	2,697,682
Other	3,306,638	0.47%	3,276,286	3,336,990

**Table 3: FY 1996 City Carriers - In-Office
Estimated Costs and Associated Confidence Limits By Direct Cost Category**

Direct Cost Category	Est. Cost	Est. Coefficient of Variation	Lower 95% Confidence Limit	Upper 95% Confidence Limit
First Class				
Letters and Parcels	1,022,368	1.72%	987,824	1,056,912
Private Mailing Cards	42,583	5.45%	38,037	47,128
Postal Cards	987	25.02%	503	1,472
Presort Letters and Parcels	502,542	1.72%	485,558	519,525
Presort Cards	16,133	7.12%	13,883	18,384
Priority	24,871	6.97%	21,474	28,267
Express	2,347	18.15%	1,512	3,182
Second Class				
Within County	9,845	16.06%	6,745	12,944
Outside County - Non Profit	24,625	5.79%	21,829	27,421
Outside County - Classroom	847	30.49%	341	1,353
Outside County - Regular	101,485	3.12%	95,275	107,696
Third Class				
Third Single Piece Rate	13,312	7.74%	11,292	15,332
Bulk - Regular Carrier Route	265,125	2.21%	253,616	276,635
Bulk - Regular 5-Digit	379,885	1.75%	366,851	392,919
Bulk - Non Profit Carrier Route	18,763	6.46%	16,387	21,138
Bulk - Non Profit 5-Digit	88,729	3.13%	83,278	94,180
Fourth Class				
Parcels - Zone Rate	5,231	11.90%	4,011	6,451
Bound Printed Matter	6,391	12.55%	4,819	7,962
Special Rate	4,927	24.90%	2,523	7,332
Library Rate	471	39.68%	105	837
Mailgrams	0	0.00%	0	0
Free for Blind/Handicapped	1,074	27.65%	492	1,656
International	8,145	9.11%	6,691	9,600
USPS	7,157	10.81%	5,640	8,674
Registry	1,339	21.24%	781	1,896
Certified	23,829	5.55%	21,238	26,420
Insurance	425	37.35%	114	737
COD	1,053	29.40%	446	1,659
Special Delivery	241	41.17%	47	436
Other Special Services	5,349	11.33%	4,161	6,536
Mixed Mail	91,975	7.16%	79,064	104,886
Other	439,267	1.93%	422,635	455,899

Table 4: FY 1996 Mail Processing Cost Pools, Variabilities, and Volume-Variable Costs

MODS 1 & 2		Short Name	Cost Pool Costs	Variability	Variable Costs
FUNCTION 1					
	Automated Equipment				
1	BCS, BCS on OCR	bcs	681,360	94.5%	643,885
2	OCR	ocr	224,198	78.6%	176,220
	Mechanized, Letters & Flats				
3	SPFSM, FSM & FSM/BCR	fsm	736,969	91.8%	676,538
4	LSM,MPLSM & SPLSM W/BCR	lsm	731,680	90.5%	662,170
	Mechanized, Other				
5	Mechanical Sort - Sack Outside	1SackS_m	47,771	99.1%	47,341
6	Mechanized Parcels	mecparc	9,607	90.2%	8,666
7	SPBS - Non Priority	SPBS Oth	174,127	46.9%	81,666
8	SPBS - Priority	SPBS Prio	57,966	80.0%	46,373
	Manual Operations				
9	Manual Flats	manf	514,848	86.6%	445,858
10	Manual Letters	manl	1,342,326	79.7%	1,069,834
11	Manual Parcels	manp	60,049	39.5%	23,719
12	Manual Priority	Priority	222,512	44.8%	99,685
13	LDC 15 - RBCS	LD15	382,392	100.3%	383,539
	Allied Operations				
14	Air Contract DCS and Incoming	1Scan	58,033	82.9%	48,109
15	Bulk Presort	1Bulk pr	11,667	72.6%	8,470
16	Cancellation & Mail Preparation - metered	1CancMPP	287,698	65.4%	188,154
17	Manual Sort - Sack Outside	1SackS_h	169,234	52.6%	89,017
18	Opening Unit - Preferred Mail	1OpPref	745,408	72.0%	536,694
19	Opening Unit - BBM	1OpBulk	315,068	74.1%	233,465
20	Platform	1Platform	891,539	72.6%	647,257
21	Pouching Operations	1Pouching	437,919	82.9%	363,035
	Other Operations				
22	Business Reply / Postage Due	BusReply	31,344	79.7%	24,981
23	Damaged Parcel Rewrap	Rewrap	15,579	78.6%	12,245
24	Empty Equipment	1EEqmt	49,885	78.6%	39,210
25	Express Mail	Express	79,142	44.8%	35,456
26	Mailgram	Mailgram	368	79.7%	293
27	Mail Processing Support	1Support	137,232	78.6%	107,864
28	Miscellaneous Activity	1Misc	130,709	78.6%	102,737
29	Registry	Registry	126,948	15.3%	19,423
30	International	Intl	110,273	78.6%	86,675
	FUNCTION 4				
31	LDC 41 - Unit Distribution - Automated	LD41	18,542	91.0%	16,873
32	LDC 42 - Unit Distribution - Mechanized	LD42	2,139	91.0%	1,946
33	LDC 43 - Unit Distribution - Manual	LD43	521,570	82.0%	427,687
34	LDC 44 - Post-Office Box Distribution	LD44	126,758	82.0%	103,942
35	LDC 48 - Customer Service / Express	LD48 Exp	3,203	45.0%	1,441
36	LDC 48 - Customer Service / Admin	LD48 Adm	148,358	0.0%	-
37	LDC 48 - Customer Service / Spec.Servc.	LD48 SpS	106,486	15.3%	16,292
37a	LDC 48 - Customer Service / Other	LD48 Oth	127,532	15.3%	19,512
38	LDC 49 - Computerized Forwarding Syst.	LD49	252,327	91.0%	229,618
39	LDC 79 - Mailing Req' & Bus. Mail Entry	LD79	134,835	73.0%	98,430
	MODS 1 & 2 Subtotal		10,225,601	76.5%	7,824,322
	BMCs				
40	Platform	Platform	176,353	53.0%	93,467
41	Allied Labor & all other Mail Processing	Allied	231,996	54.0%	125,278
42	Parcel Sorting Machine	PSM	84,109	90.0%	75,698
43	Sack Sorting Machine	SSM	30,798	99.0%	30,489
44	SPBS & Irregular Parcels (IPP & 115)	SPB	63,812	73.0%	46,583
45	Non-Machinable Outside (NMO)	NMO	29,316	67.0%	19,542
	BMCs Subtotal		616,384	63.5%	391,157
	OTHER				
46	All Other Operations (i.e., non-MODS)	Non-MODS	2,324,491	78.6%	1,827,050
	TOTAL		13,166,476	76.3%	10,042,529

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS bcs	MODS ocr	MODS fsm	MODS ism	MODS mecparc	MODS SPBS Oth
Letters and Parcels	342,248	119,279	370,577	494,859	1,518	19,874
Presort Letters and Parcels	169,043	27,333	18,321	69,830	18	897
Postal Cards	0	71	-	599	0	-
Private Mailing Cards	6,532	2,792	369	26,142	98	69
Presort Cards	3,295	758	3	3,637	0	136
Total First Class	521,118	150,234	389,271	595,067	1,635	20,976
Priority	393	29	7,983	247	3,081	7,017
Express	108	2	164	490	1	-
Mailgrams	-	-	-	-	0	-
Within County	2	0	501	99	12	151
Outside County - Regular	613	260	39,303	931	513	5,229
Outside County - Non Profit	387	86	8,049	393	171	1,229
Outside County - Classroom	1	0	831	1	7	139
Total Second Class	1,002	347	48,684	1,424	703	6,747
Third Single Piece Rate	2,254	358	4,171	2,402	8	1,073
Bulk - Regular Carrier Route	8,819	2,409	9,226	3,195	223	6,502
Bulk - Regular 5-Digit	77,889	12,642	171,609	30,010	484	29,117
Total Third Bulk Regular	86,708	15,051	180,835	33,205	707	35,619
Bulk - Non Profit Carrier Route	2,164	798	661	667	84	478
Bulk - Non Profit 5-Digit	25,676	5,695	27,308	13,995	369	5,877
Total Third Bulk Non Profit	27,840	6,492	27,969	14,662	453	6,354
Total Third Class	116,802	21,901	212,974	50,268	1,168	43,047
Parcels - Zone Rate	41	6	1,311	93	1,221	705
Bound Printed Matter	58	2	2,023	17	317	1,104
Special Rate	4	76	1,161	104	101	384
Library Rate	2	0	325	1	197	236
Total Fourth Class	105	84	4,820	216	1,836	2,428
USPS	696	448	4,296	2,138	78	651
Free for Blind/Handicapped	2	1	0	1	2	511
International	2,857	2,466	6,507	10,650	6	143
Registry	27	148	112	39	3	33
Certified	-	-	-	-	0	-
Insurance	-	-	-	-	-	-
COD	-	-	-	-	0	-
Special Delivery	-	-	-	-	-	-
Special Handling	-	-	-	-	-	-
Other Special Services	774	561	1,728	1,630	152	111
Total	643,885	176,220	676,538	662,170	8,666	81,666

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS SPBS Prio	MODS 1SackS_m	MODS manf	MODS manl	MODS manp	MODS Priority
Letters and Parcels	9,511	8,336	175,540	632,570	4,334	7,927
Presort Letters and Parcels	1,310	1,637	12,850	119,617	547	1,023
Postal Cards	0	0	0	551	0	0
Private Mailing Cards	19	8	77	33,976	2	72
Presort Cards	11	1	335	8,492	1	0
Total First Class	10,852	9,981	188,801	795,206	4,883	9,023
Priority	27,718	3,488	10,048	4,215	6,663	80,642
Express	32	40	768	1,309	421	1,173
Mailgrams	0	0	-	72	0	-
Within County	2	40	2,923	639	0	2
Outside County - Regular	1,161	7,718	72,576	10,756	1,024	630
Outside County - Non Profit	135	2,766	10,795	2,123	201	8
Outside County - Classroom	0	27	383	1	0	0
Total Second Class	1,298	10,551	86,676	13,518	1,226	639
Third Single Piece Rate	189	130	4,208	7,679	312	400
Bulk - Regular Carrier Route	793	2,715	6,894	9,802	564	285
Bulk - Regular 5-Digit	1,697	10,172	111,471	148,974	3,167	704
Total Third Bulk Regular	2,490	12,887	118,365	158,776	3,731	989
Bulk - Non Profit Carrier Route	12	309	608	1,530	1	9
Bulk - Non Profit 5-Digit	108	2,381	22,944	61,666	181	169
Total Third Bulk Non Profit	120	2,690	23,552	63,196	182	178
Total Third Class	2,799	15,707	146,124	229,650	4,226	1,567
Parcels - Zone Rate	1,032	2,919	711	626	3,393	369
Bound Printed Matter	180	484	2,732	378	555	97
Special Rate	252	797	802	301	992	171
Library Rate	2	1	671	84	254	4
Total Fourth Class	1,465	4,201	4,916	1,389	5,195	641
USPS	536	5	1,624	5,322	510	3,063
Free for Blind/Handicapped	556	1	553	397	0	67
International	1,037	3,353	5,400	13,702	544	2,730
Registry	78	14	65	544	52	42
Certified	0	-	-	-	0	-
Insurance	-	-	-	-	-	-
COD	0	-	-	-	0	-
Special Delivery	-	-	-	-	-	-
Special Handling	-	-	-	-	-	-
Other Special Services	2	0	885	4,509	1	97
Total	46,373	47,341	445,858	1,069,834	23,719	99,685

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS LD15	MODS 1Bulk pr	MODS 1CancMPP	MODS 1OpBulk	MODS 1OpPref	MODS 1Platform
Letters and Parcels	276,906	2,095	157,525	51,610	240,823	234,627
Presort Letters and Parcels	53,179	3,740	6,147	10,961	66,002	54,081
Postal Cards	-	0	64	-	90	112
Private Mailing Cards	8,843	58	3,368	575	3,206	2,398
Presort Cards	1,850	222	193	278	806	1,244
Total First Class	340,778	6,115	167,296	63,424	310,928	292,462
Priority	-	310	6,494	7,270	40,588	87,825
Express	-	7	177	370	1,942	9,662
Mailgrams	-	0	-	-	-	-
Within County	-	3	12	165	790	926
Outside County - Regular	1,186	309	1,391	13,107	53,233	51,210
Outside County - Non Profit	-	16	132	1,626	8,524	7,466
Outside County - Classroom	-	1	4	591	433	459
Total Second Class	1,186	329	1,539	15,489	62,979	60,060
Third Single Piece Rate	1,938	162	1,007	2,297	2,991	4,699
Bulk - Regular Carrier Route	4,506	412	768	17,587	14,300	22,687
Bulk - Regular 5-Digit	22,373	541	2,789	96,215	64,238	88,901
Total Third Bulk Regular	26,879	952	3,557	113,802	78,538	111,588
Bulk - Non Profit Carrier Route	-	12	76	2,737	687	1,558
Bulk - Non Profit 5-Digit	4,547	449	1,199	21,621	19,072	18,134
Total Third Bulk Non Profit	4,547	460	1,275	24,358	19,759	19,692
Total Third Class	33,365	1,575	5,839	140,457	101,288	135,979
Parcels - Zone Rate	-	16	918	2,024	3,211	24,416
Bound Printed Matter	-	77	160	1,905	2,437	6,171
Special Rate	-	9	167	1,021	1,219	5,623
Library Rate	-	3	190	136	515	1,154
Total Fourth Class	-	104	1,435	5,085	7,382	37,364
USPS	1,321	4	1,490	157	4,284	5,470
Free for Blind/Handicapped	-	2	172	2	1,246	1,279
International	5,932	20	2,009	915	4,980	16,232
Registry	-	4	15	14	517	416
Certified	-	0	-	-	-	53
Insurance	-	-	-	-	-	-
COD	-	0	-	-	-	-
Special Delivery	-	-	-	-	-	44
Special Handling	-	-	-	-	43	-
Other Special Services	956	0	1,689	284	516	411
Total	383,539	8,470	188,154	233,465	536,694	647,257

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS 1Pouching	MODS 1Sacks_h	MODS 1SCAN	MODS Express	MODS BusReply	MODS Mailgram
Letters and Parcels	181,196	20,611	17,950	2,321	7,334	-
Presort Letters and Parcels	42,610	6,996	5,788	476	927	-
Postal Cards	372	-	0	0	0	-
Private Mailing Cards	2,725	425	54	78	475	-
Presort Cards	1,615	-	0	0	129	-
Total First Class	228,518	28,032	23,793	2,875	8,864	-
Priority	26,827	14,744	17,194	1,924	285	-
Express	2,705	1,279	3,386	26,727	114	-
Mailgrams	-	-	-	-	0	-
Within County	235	664	3	1	1	-
Outside County - Regular	17,921	12,002	1,063	174	18	-
Outside County - Non Profit	3,700	2,395	17	5	2	-
Outside County - Classroom	349	22	1	0	0	-
Total Second Class	22,206	15,082	1,084	180	21	-
Third Single Piece Rate	1,841	509	141	159	447	-
Bulk - Regular Carrier Route	5,024	4,691	493	11	11	-
Bulk - Regular 5-Digit	49,661	13,199	996	275	547	-
Total Third Bulk Regular	54,685	17,890	1,489	286	559	-
Bulk - Non Profit Carrier Route	390	568	11	1	1	-
Bulk - Non Profit 5-Digit	7,390	2,791	87	112	99	-
Total Third Bulk Non Profit	7,780	3,359	98	113	100	-
Total Third Class	64,306	21,758	1,729	557	1,105	-
Parcels - Zone Rate	2,141	3,530	48	14	157	255
Bound Printed Matter	928	785	241	6	160	-
Special Rate	1,025	620	4	107	0	-
Library Rate	944	258	4	0	1	-
Total Fourth Class	5,038	5,193	299	127	319	255
USPS	2,286	740	42	923	278	-
Free for Blind/Handicapped	794	267	2	1	1	-
International	9,890	1,815	339	2,055	294	-
Registry	229	-	183	57	89	39
Certified	-	-	-	0	756	-
Insurance	-	-	-	-	-	-
COD	-	-	-	-	-	-
Special Delivery	-	-	-	28	-	-
Special Handling	-	31	-	-	-	-
Other Special Services	235	76	59	2	12,857	-
Total	363,035	89,017	48,109	35,456	24,981	293

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS Registry	MODS Rewrap	MODS 1EEqmt	MODS 1Misc	MODS 1Support	MODS Intl
Letters and Parcels	1,806	6,463	15,111	52,085	54,221	8,184
Presort Letters and Parcels	8	183	3,386	8,971	10,440	1,159
Postal Cards	-	169	10	26	32	-
Private Mailing Cards	44	647	430	1,676	1,529	257
Presort Cards	-	-	109	638	395	0
Total First Class	1,859	7,462	19,045	63,396	66,616	9,601
Priority	310	1,638	1,986	5,763	5,886	2,006
Express	416	-	563	1,138	1,117	1,990
Mailgrams	-	-	0	1	1	-
Within County	0	1	319	105	163	24
Outside County - Regular	52	245	2,598	3,948	4,734	1,106
Outside County - Non Profit	1	8	404	800	765	81
Outside County - Classroom	0	1	27	40	48	3
Total Second Class	54	254	3,349	4,893	5,711	1,213
Third Single Piece Rate	1	201	271	700	660	119
Bulk - Regular Carrier Route	3	13	1,294	1,738	1,933	121
Bulk - Regular 5-Digit	39	1,832	7,605	13,516	15,242	1,405
Total Third Bulk Regular	42	1,845	8,898	15,254	17,175	1,526
Bulk - Non Profit Carrier Route	0	0	190	235	212	1
Bulk - Non Profit 5-Digit	5	26	1,685	4,074	3,947	329
Total Third Bulk Non Profit	5	27	1,875	4,309	4,159	329
Total Third Class	47	2,072	11,045	20,263	21,994	1,974
Parcels - Zone Rate	35	3	774	759	920	236
Bound Printed Matter	7	1	262	356	319	1
Special Rate	65	-	135	188	225	2
Library Rate	0	0	53	69	82	34
Total Fourth Class	107	5	1,225	1,371	1,547	273
USPS	339	6	216	988	832	292
Free for Blind/Handicapped	0	-	220	82	99	123
International	324	807	827	3,327	2,689	65,706
Registry	15,586	-	420	571	416	3,453
Certified	80	-	54	79	118	33
Insurance	-	-	1	-	-	-
COD	-	-	5	2	78	-
Special Delivery	-	-	2	2	5	-
Special Handling	-	-	1	2	3	4
Other Special Services	300	2	251	858	753	5
Total	19,423	12,245	39,210	102,737	107,864	86,675

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS LD41	MODS LD42	MODS LD43	MODS LD44	MODS LD48 Exp	MODS LD48 Oth
Letters and Parcels	8,579	893	169,193	59,109	214	7,840
Presort Letters and Parcels	5,665	106	43,038	18,012	16	2,356
Postal Cards	0	0	79	0	0	2
Private Mailing Cards	0	15	3,856	1,064	1	270
Presort Cards	91	37	883	67	0	45
Total First Class	14,335	1,051	217,048	78,252	231	10,513
Priority	10	21	29,352	3,526	19	1,132
Express	0	1	4,215	757	1,092	257
Mailgrams	-	0	-	0	-	0
Within County	-	0	1,006	138	0	23
Outside County - Regular	76	59	21,985	3,189	9	721
Outside County - Non Profit	-	1	3,488	415	0	140
Outside County - Classroom	-	0	87	0	0	2
Total Second Class	76	60	26,567	3,743	9	886
Third Single Piece Rate	110	77	3,263	68	1	124
Bulk - Regular Carrier Route	237	35	30,214	1,414	9	1,099
Bulk - Regular 5-Digit	1,592	546	66,421	11,716	36	2,284
Total Third Bulk Regular	1,829	581	96,635	13,130	45	3,383
Bulk - Non Profit Carrier Route	69	27	3,470	301	1	177
Bulk - Non Profit 5-Digit	365	63	14,469	1,816	14	503
Total Third Bulk Non Profit	434	90	17,939	2,117	15	680
Total Third Class	2,373	748	117,837	15,315	61	4,187
Parcels - Zone Rate	0	23	10,457	169	10	359
Bound Printed Matter	-	0	4,721	258	4	116
Special Rate	0	21	4,864	379	3	181
Library Rate	-	0	839	2	1	17
Total Fourth Class	0	45	20,881	809	17	674
USPS	-	21	2,633	520	1	147
Free for Blind/Handicapped	77	0	723	1	0	16
International	0	1	2,713	369	3	71
Registry	0	0	1,308	358	8	305
Certified	-	0	2,006	0	-	498
Insurance	-	-	116	-	-	15
COD	-	0	317	-	-	45
Special Delivery	-	-	-	-	-	10
Special Handling	-	-	-	-	-	-
Other Special Services	-	0	1,973	292	0	757
Total	16,873	1,946	427,687	103,942	1,441	19,512

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	MODS LD48 Ssv	MODS LD49	MODS LD79	BMCs NMO	BMCs PSM	BMCs SPB
Letters and Parcels	4,167	81,152	7,808	1	553	941
Presort Letters and Parcels	894	61,941	18,438	2	-	605
Postal Cards	0	0	0	-	-	-
Private Mailing Cards	107	5,631	1,333	0	-	0
Presort Cards	0	1,963	1,130	-	-	-
Total First Class	5,168	150,687	28,709	3	553	1,547
Priority	588	1,709	1,606	83	343	79
Express	1,329	12	33	0	-	0
Mailgrams	-	0	0	-	-	-
Within County	0	648	423	0	0	27
Outside County - Regular	180	21,682	1,270	503	118	1,522
Outside County - Non Profit	81	5,671	787	2	2	571
Outside County - Classroom	0	1	0	2	-	8
Total Second Class	261	28,001	2,480	507	121	2,128
Third Single Piece Rate	81	8,242	1,073	70	2,311	1,611
Bulk - Regular Carrier Route	244	2,250	6,707	415	677	1,871
Bulk - Regular 5-Digit	774	9,429	37,112	4,377	23,113	23,168
Total Third Bulk Regular	1,018	11,679	43,819	4,792	23,790	25,039
Bulk - Non Profit Carrier Route	1	306	1,390	65	75	141
Bulk - Non Profit 5-Digit	31	1,531	16,587	536	1,352	4,337
Total Third Bulk Non Profit	32	1,837	17,977	601	1,427	4,478
Total Third Class	1,130	21,758	62,869	5,463	27,528	31,128
Parcels - Zone Rate	35	612	461	8,250	12,329	3,752
Bound Printed Matter	58	1,925	6	1,308	10,500	1,316
Special Rate	117	283	2	1,086	15,578	1,917
Library Rate	0	77	1	1,215	2,332	315
Total Fourth Class	211	2,898	470	11,859	40,739	7,300
USPS	308	11,970	1,484	839	377	518
Free for Blind/Handicapped	0	214	1	1	560	455
International	242	999	680	887	5,434	3,393
Registry	1,851	13	62	-	-	36
Certified	2,016	0	0	-	-	-
Insurance	-	-	-	-	-	-
COD	63	-	0	-	-	-
Special Delivery	150	-	-	-	-	-
Special Handling	-	-	-	-	-	-
Other Special Services	2,976	11,358	37	-	43	-
Total	16,292	229,618	98,430	19,642	75,699	46,583

Table 5: FY 1996 Distributed Volume-Variable Cost by Cost Pool and Subclass (NEW methodology)

Subclass	BMCs SSM	BMCs Allied	BMCs Platform	Non-MODS	Total
Letters and Parcels	110	1,948	497	795,228	4,655,673
Presort Letters and Parcels	108	-	201	214,642	1,063,505
Postal Cards	-	-	-	883	3,062
Private Mailing Cards	0	93	14	23,961	133,288
Presort Cards	-	-	-	7,399	35,765
Total First Class	218	2,041	712	1,042,113	5,891,292
Priority	1	599	330	65,924	477,893
Express	0	-	19	20,556	84,370
Mailgrams	-	-	-	-	75
Within County	12	20	35	5,046	15,161
Outside County - Regular	4,545	3,720	5,499	91,113	461,201
Outside County - Non Profit	727	856	1,326	14,267	80,618
Outside County - Classroom	113	414	325	1,311	5,632
Total Second Class	5,397	5,011	7,184	111,737	562,612
Third Single Piece Rate	383	4,208	2,309	12,928	78,184
Bulk - Regular Carrier Route	2,679	5,437	5,151	80,315	265,772
Bulk - Regular 5-Digit	11,830	42,940	27,741	299,721	1,540,108
Total Third Bulk Regular	14,509	48,377	32,892	380,036	1,805,880
Bulk - Non Profit Carrier Route	124	658	374	7,719	28,895
Bulk - Non Profit 5-Digit	1,813	7,149	3,508	60,717	366,726
Total Third Bulk Non Profit	1,937	7,806	3,882	68,436	395,620
Total Third Class	16,829	60,391	39,083	461,400	2,279,685
Parcels - Zone Rate	3,529	23,992	21,154	19,634	156,650
Bound Printed Matter	815	9,133	8,377	12,908	73,210
Special Rate	1,422	9,737	7,458	8,471	67,076
Library Rate	353	1,951	1,986	1,758	16,065
Total Fourth Class	6,119	44,813	38,975	42,771	313,001
USPS	205	1,009	1,197	16,780	77,044
Free for Blind/Handicapped	0	595	278	720	10,022
International	1,719	10,622	5,659	6,429	206,773
Registry	-	105	25	14,973	42,211
Certified	-	-	-	12,789	18,484
Insurance	-	8	-	630	771
COD	-	-	-	1,307	1,817
Special Delivery	-	-	-	-	243
Special Handling	-	-	-	115	199
Other Special Services	-	84	6	28,806	76,036
Total	30,489	125,278	93,467	1,827,050	10,042,529

Table 6: FY 1996 Clerks and Mailhandlers – Mail Processing
 Estimated Costs and Associated Confidence Limits By Direct Cost Category (NEW methodology)

Direct Cost Category	Est. Cost	Est. Coefficient of Variation	Lower 95% Confidence Limit	Upper 95% Confidence Limit
First Class				
Letters and Parcels	2,466,167	0.54%	2,439,926	2,492,408
Private Mailing Cards	78,315	4.10%	72,026	84,604
Postal Cards	1,662	19.67%	1,021	2,303
Presort Letters and Parcels	538,754	1.53%	522,546	554,962
Presort Cards	23,079	11.72%	17,779	28,379
Priority	162,067	1.85%	156,189	167,944
Express	24,858	4.76%	22,539	27,178
Second Class				
Within County	7,722	12.91%	5,768	9,676
Outside County - Non Profit	36,478	4.30%	33,405	39,551
Outside County - Classroom	2,101	30.17%	859	3,343
Outside County - Regular	202,342	1.75%	195,410	209,273
Third Class				
Third Single Piece Rate	37,603	5.86%	33,283	41,922
Bulk - Regular Carrier Route	120,085	3.57%	111,682	128,489
Bulk - Regular 5-Digit	749,735	1.09%	733,751	765,719
Bulk - Non Profit Carrier Route	12,172	6.87%	10,534	13,810
Bulk - Non Profit 5-Digit	181,653	2.37%	173,218	190,089
Fourth Class				
Parcels - Zone Rate	57,674	2.84%	54,468	60,881
Bound Printed Matter	31,673	4.22%	29,055	34,291
Special Rate	31,918	3.79%	29,550	34,286
Library Rate	7,084	8.80%	5,862	8,306
Mailgrams	50	95.13%	-43	144
Free for Blind/Handicapped	4,103	11.05%	3,215	4,992
International	89,235	3.94%	82,350	96,120
USPS	39,583	7.17%	34,023	45,143
Registry	21,256	5.14%	19,115	23,397
Certified	13,970	7.55%	11,902	16,039
Insurance	547	37.67%	143	952
COD	1,566	25.46%	785	2,348
Special Delivery	146	44.27%	19	273
Other Special Services	50,940	5.90%	45,047	56,833
Mixed Mail	2,140,038	0.61%	2,114,585	2,165,490
Other	2,907,951	0.44%	2,882,965	2,932,938
Total	10,042,530			