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

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000–1

NOTICE OF THE UNITED STATES POSTAL SERVICE
OF FILING OF REVISIONS TO LIBRARY REFERENCE USPS-LR-I-150
AND THE TESTIMONY AND WORKPAPERS OF WITNESS
KAY – ERRATA

The United States Postal Service hereby gives notice that it is filing today relatively minor revisions to the testimony and supporting material of witness Kay.

In the testimony (USPS-T-23), the changes are as indicated on the attached sheet. Revised pages of the testimony are also attached. Of most interest to the parties is likely to be the change to the estimated incremental cost of Priority Mail. However, the estimated reduction of $3-4 million is a change of approximately one-tenth of one percent, so the impact of even this change is minimal. Changes are also made in the reported incremental costs for grouped products (one very minor change at the bottom of Table 1 on page 22, and throughout Table 2 on page 23). The Postal Service's case does not rely on any of these numbers. Lastly, a new row is included on Table 2, which includes the combined category of all outside-county Periodicals (Regular, Nonprofit, Classroom). The change in the formula on page 18 corrects a typographical error, and has no effect on the analysis.

With respect to LR-I-150, a replacement CD-ROM is provided. This CD-ROM replaces entirely that provided originally. The attached sheet ("Changes To USPS-LR-I-150") describes the changes in the incremental cost model files that resulted in the changes in Tables 1 and 2 of the testimony. The last change described on that sheet (regarding "WPTables.xls in folder Supporting Materials") involves a correction to the table which crosswalks individual cost pools with the cost pool

categories defined by Prof. Bradley in USPS-T-22. This change has no effect on any calculation, but is made for purposes of analytic clarity, in order to better align the application of witness Kay's model with Prof. Bradley's theoretical outline. Since a hard copy of the table in question is also included within Volume 1 of witness Kay's workpapers, a revised copy of that page of the workpapers is also attached, along with a sheet describing the changes.

Although other avenues of inquiry are certainly available, because all of these changes are technical in nature, parties with questions about them may wish to pose such questions at the technical conference for witnesses Kay and Bradley, scheduled for next Friday, February 25th.

Respectfully submitted,

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Errata to Testimony of United States Postal Service Witness Kay,

USPS-T-23

1. Page 18. Corrected multi-driver constant elasticity formula in footnote 6.

2. Page 22. Revised entries in Table 1A, line 9, for Priority Mail.

3. Page 22. Revised entries in Table 1A, line 52, for Correspondence Mail

4. Page 23. Revised entries in Table 2A, columns 2, 4, 6, and 8.

5. Page 23. Added line 37 and 38 for Total Periodicals Outside County.

1   The incremental cost for Certified contains no product specific costs, yet incremental

2   cost is 18.8% higher than volume variable cost.   Two of the reasons for a large

3   difference between volume variable and incremental cost apply to this accountable:

4

5   a) the amount of driver in a subclass is large; and

6   b) the volume variability is particularly low.

7

8   77% of the $72.0 million difference between incremental and volume variable cost in

9   BY1998 incremental cost comes from four city carrier (C/S 7) cost pools – Letter Route

10   Load SDR, Letter Route Load MDR, Letter Route Load BAM, and Street Support Load[5].

11   Letter route load costs are driven by shape of mail, including letters, flats, parcels,

12   accountables, collections, and deliveries. (See witness Baron, USPS-T-12, at 4-6.)

13   The volume variability for loading accountables is particularly low - 4.2% for single

14   delivery residential (SDR) stops, 1.3% for multiple delivery residential (MDR) stops, and

15   24.5% for business and mixed (BAM) stops[6]. In addition, more than 60% of the driver

16   for loading accountables is in the Certified special service.   This combination of low

17   volume variability and a large proportion of the driver in the Certified special service

18   lead to an incremental cost that is significantly larger than volume variable cost.

19

20   For example, BY 1998 volume variable cost for Certified in the Letter Route Load

21   SDR cost pool is $37.8 million, while incremental cost is $61.4 million - an increase of

22   62%.   The Street Support Load cost pool borrows the variability and distribution in large

23   part from these three Letter Route Load cost pools, so the incremental cost for Certified

24   in this dependent component is also much higher than volume variable cost. Table 6

25   shows the incremental and volume variable costs for all four cost pools.

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[5] These cost pools are aggregated into the CS 7 Load component for use in the Roll-forward model. There is not enough information to determine the TY2001(AR) costs in the individual cost pools. Therefore this discussion uses BY1998 costs.

[6] The incremental cost for letter route load is calculated with a variation of the constant elasticity formula that takes into account the multiple drivers. This is represented mathematically by

$$IC_{ij} = \alpha_j D_{jl}^{\varepsilon_{jl}} D_{jf}^{\varepsilon_{jf}} D_{jp}^{\varepsilon_{jp}} D_{ja}^{\varepsilon_{ja}} D_{jd}^{\varepsilon_{jd}} \left[1 - (1-\theta_{ijl})^{\varepsilon_{jl}} (1-\theta_{ijf})^{\varepsilon_{jf}} (1-\theta_{ijp})^{\varepsilon_{jp}} (1-\theta_{ija})^{\varepsilon_{ja}} (1-\theta_{ijd})^{\varepsilon_{jd}} \right]$$

where *l* represents letters and collections, *f* represents flats, *p* represents parcels, *a* represents accountables, and *d* represents deliveries (the deliveries term is not used for SDR stop types).

TABLE 1A. BY1998 AND TY2001(AR) VOLUME VARIABLE AND INCREMENTAL COST FOR SUBCLASSES AND CLASSES

LINE NO.	CLASS, SUBCLASS, OR SPECIAL SERVICE	BY1998 VOLUME VARIABLE COST	BY1998 INCREMENTAL COST	TY2001(BR) VOLUME VARIABLE COST	TY2001(BR) INCREMENTAL COST	TY2001(AR) VOLUME VARIABLE COST	TY2001(AR) INCREMENTAL COST	TY2001(AR) VOLUME VARIABLE COST PER RPW PIECE	TY2001(AR) INCREMENTAL COST PER RPW PIECE
	COLUMN NUMBER	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	FIRST-CLASS MAIL:								
2	SINGLE-PIECE LETTERS	12,412,946	13,066,072	13,515,330	14,260,464	13,437,357	14,179,317	$ 0.2541	$ 0.2682
3	PRESORT LETTERS	4,167,656	4,298,679	5,050,613	5,216,914	5,019,464	5,186,914	$ 0.1066	$ 0.1105
4	TOTAL LETTERS	16,580,602	17,811,534	18,565,943	19,977,722	18,456,821	19,865,336	$ 0.1648	$ 0.1969
5	SINGLE-PIECE CARDS	519,574	531,568	554,794	567,906	539,919	552,719	$ 0.1949	$ 0.1995
6	PRESORT CARDS	147,145	148,718	172,878	174,731	166,958	170,600	$ 0.0633	$ 0.0640
7	TOTAL CARDS	666,719	680,982	727,672	743,401	706,877	724,264	$ 0.1303	$ 0.1331
8	TOTAL FIRST-CLASS	17,247,321	18,684,936	19,293,615	20,939,007	19,165,699	20,805,817	$ 0.1820	$ 0.1976
9	PRIORITY MAIL	2,395,877	2,693,697	3,263,396	3,604,224	3,064,062	3,402,686	$ 2.4517	$ 2.7227
10	EXPRESS MAIL	384,614	606,005	476,631	716,760	480,984	723,261	$ 6.6525	$ 10.0035
11	MAILGRAMS	1,105	1,135	991	1,017	1,000	1,026	$ 0.2995	$ 0.3073
12	PERIODICALS:								
13	IN-COUNTY	76,873	77,531	82,227	82,923	81,397	82,098	$ 0.0944	$ 0.0952
14	OUTSIDE COUNTY:								
15	REGULAR	1,749,726	1,765,946	2,031,214	2,050,321	1,981,567	2,000,331	$ 0.2695	$ 0.2721
16	NON-PROFIT	362,146	364,107	370,260	372,301	388,570	390,717	$ 0.1893	$ 0.1904
17	CLASSROOM	13,991	14,025	14,264	14,321	14,034	14,071	$ 0.2548	$ 0.2554
18	TOTAL PERIODICALS	2,202,736	2,230,504	2,498,005	2,529,870	2,465,569	2,497,245	$ 0.2369	$ 0.2420
19	STANDARD MAIL (A):								
20	SINGLE-PIECE RATE	213,627	213,766		-		-		
21	COMMERCIAL STANDARD:								
22	ENHANCED CARR RTE	2,234,465	2,384,600	2,527,785	2,675,104	2,471,864	2,617,126	$ 0.0753	$ 0.0797
23	REGULAR	5,535,163	5,624,610	7,125,095	7,242,821	6,823,934	6,937,525	$ 0.1664	$ 0.1692
24	TOTAL COMMERCIAL	7,769,648	8,163,178	9,652,879	10,136,605	9,295,798	9,767,090	$ 0.1259	$ 0.1323
25	AGGREGATE NONPROFIT:								
26	NONPROF ENH CARR RTE	169,833	169,987	212,388	212,560	206,577	206,766	$ 0.0731	$ 0.0732
27	NONPROFIT	1,130,549	1,141,977	1,326,100	1,339,791	1,320,611	1,334,443	$ 0.1156	$ 0.1168
28	TOTAL AGGREG NONPROFIT	1,300,382	1,313,236	1,538,488	1,554,011	1,529,189	1,544,778	$ 0.1071	$ 0.1082
29	TOTAL STANDARD (A)	9,283,657	9,802,400	11,191,366	11,812,270	10,824,987	11,431,673	$ 0.1229	$ 0.1298
30	STANDARD MAIL (B):								
31	PARCELS ZONE RATE	851,780	869,095	1,078,202	1,087,513	1,052,158	1,061,265	$ 2.6125	$ 2.6369
32	BOUND PRINTED MATTER	304,443	397,031	493,424	496,691	479,204	482,390	$ 0.9132	$ 0.9193
33	SPECIAL STANDARD	247,586	248,267	304,846	305,677	301,195	302,020	$ 1.4636	$ 1.4676
34	LIBRARY MAIL	41,051	41,102	48,295	48,355	47,444	47,504	$ 1.6667	$ 1.6708
35	TOTAL STANDARD (B)	1,544,872	1,570,300	1,924,767	1,957,184	1,880,002	1,911,763	$ 1.6592	$ 1.6673
36	US POSTAL SERVICE	262,796	263,140						
37	FREE MAIL	33,441	33,456	40,302	40,322	40,348	40,368	$ 0.7119	$ 0.7123
38	INTERNATIONAL MAIL	1,311,481	1,391,457	1,473,998	1,575,169	1,429,916	1,531,016	$ 1.3661	$ 1.4641
39	SPECIAL SERVICES:								
40	REGISTRY	99,336	99,452	89,272	89,361	85,204	85,307	$ 7.7698	$ 7.7793
41	CERTIFIED	402,771	474,753	494,945	566,165	461,746	548,609	$ 1.6795	$ 1.9966
42	INSURANCE	61,656	61,759	76,162	76,306	76,636	76,780	$ 1.7153	$ 1.7184
43	COD	14,171	14,193	15,105	15,129	14,991	15,016	$ 4.2301	$ 4.2369
44	SPECIAL DELIVERY	1	1	1	1	1	1		
45	MONEY ORDERS	122,800	173,656	159,605	222,366	153,995	214,999	$ 0.6801	$ 0.9495
46	STAMPED CARDS	3,208	3,208	3,444	3,444	3,444	3,444		
47	STAMPED ENVELOPES	13,111	13,118	12,542	12,549	12,544	12,551		
48	SPECIAL HANDLING	2,221	2,221	2,484	2,492	2,482	2,490		
49	POST OFFICE BOX	473,477	473,640	597,451	597,649	589,226	589,421		
50	OTHER	90,832	90,935	136,667	136,799	136,842	136,975		
51	TOTAL SPECIAL SERVICES	1,283,586	1,436,630	1,591,677	1,791,967	1,539,113	1,730,223		
52	CORRESPONDENCE	17,248,426	18,686,336	19,294,606	20,940,270	19,166,699	20,807,090	$ 0.1820	$ 0.1976
53	ADVERTISING	9,676,100	10,215,358	11,684,792	12,332,653	11,304,191	11,937,119	$ 0.1275	$ 0.1347
54	EXPEDITED	3,930,920	4,547,597	5,171,371	5,877,019	4,945,878	5,844,707	$ 2.5621	$ 2.9242

TABLE 2A. BY1998 AND TY2001(AR) VOLUME VARIABLE AND INCREMENTAL COST FOR SELECTED SUBCLASS COMBINATIONS

LINE NO	CLASS, SUBCLASS, OR SPECIAL SERVICE	BY1998 VOLUME VARIABLE COST	BY1998 INCREMENTAL COST	TY2001(BR) VOLUME VARIABLE COST	TY2001(BR) INCREMENTAL COST	TY2001(AR) VOLUME VARIABLE COST	TY2001(AR) INCREMENTAL COST	TY2001(AR) VOLUME VARIABLE COST PER RPW PIECE	TY2001(AR) INCREMENTAL COST PER RPW PIECE
	COLUMN NUMBER	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
1	PRIORITY & EXPRESS	2,780,491	3,301,961	3,740,027	4,325,542	3,545,046	4,126,634	$ 2.6541	$ 3.0910
2	PRIORITY & PERIODICALS IN-COUNTY	2,472,750	2,771,748	3,345,622	3,687,266	3,145,459	3,485,344	$ 1.4709	$ 1.8308
3	PRIORITY & PERIODICALS REGULAR	4,145,603	4,472,065	5,294,610	5,669,405	5,045,650	5,417,477	$ 0.5657	$ 0.6288
4	PRIORITY & PERIODICALS NON-PROFIT	2,758,023	3,060,410	3,633,676	3,978,647	3,452,632	3,796,042	$ 1.0413	$ 1.1449
5	PRIORITY & PERIODICALS CLASSROOM	2,409,868	2,707,818	3,277,680	3,618,642	3,078,096	3,417,237	$ 2.3346	$ 2.5918
6	PRIORITY & STANDARD (A) NON-PROFIT	3,526,426	3,837,909	4,589,496	4,945,245	4,384,674	4,738,474	$ 0.3455	$ 0.3734
7	PRIORITY & STANDARD (B) ZONE RATE	3,257,657	3,565,567	4,341,598	4,723,372	4,116,221	4,494,425	$ 2.5137	$ 2.7447
8	PRIORITY & STANDARD (B) BPM	2,790,320	3,103,409	3,756,820	4,119,265	3,543,268	3,902,883	$ 1.9815	$ 2.1826
9	EXPRESS & PERIODICALS IN-COUNTY	461,487	683,468	558,858	601,552	562,382	805,196	$ 0.6019	$ 0.8618
10	EXPRESS & PERIODICALS REGULAR	2,134,340	2,372,496	2,507,845	2,769,722	2,462,572	2,724,220	$ 0.3317	$ 0.3669
11	EXPRESS & PERIODICALS NON-PROFIT	746,760	970,170	846,911	1,090,964	869,555	1,113,696	$ 0.4093	$ 0.5243
12	EXPRESS & PERIODICALS CLASSROOM	398,805	620,036	490,916	733,093	495,019	737,321	$ 3.8659	$ 5.7879
13	EXPRESS & STANDARD (A) NON-PROFIT	1,515,163	1,747,614	1,802,731	2,058,087	1,801,598	2,057,280	$ 0.1587	$ 0.1789
14	EXPRESS & STANDARD (B) ZONE RATE	1,246,394	1,476,395	1,554,634	1,807,699	1,533,143	1,785,820	$ 3.4345	$ 4.0005
15	EXPRESS & STANDARD (B) BPM	779,057	1,003,220	970,055	1,215,732	960,186	1,205,839	$ 1.6082	$ 2.0197
16	PERIODICALS IN-COUNTY & PERIODICALS REGULAR	1,826,599	1,845,427	2,113,440	2,135,495	2,062,965	2,084,638	$ 0.2512	$ 0.2538
17	PERIODICALS IN-COUNTY & PERIODICALS NON-PROFIT	439,019	442,136	452,507	455,756	469,968	473,361	$ 0.1613	$ 0.1624
18	PERIODICALS IN-COUNTY & PERIODICALS CLASSROOM	90,864	91,571	96,511	97,258	95,432	96,183	$ 0.1041	$ 0.1049
19	PERIODICALS IN-COUNTY & STANDARD (A) NON-PROFIT	1,207,422	1,219,754	1,408,327	1,422,711	1,402,009	1,416,520	$ 0.1141	$ 0.1153
20	PERIODICALS IN-COUNTY & STANDARD (B) ZONE RATE	936,853	946,853	1,160,429	1,170,810	1,133,556	1,143,733	$ 0.9170	$ 0.9252
21	PERIODICALS IN-COUNTY & STANDARD (B) BPM	471,316	474,777	575,650	579,690	560,601	564,758	$ 0.4042	$ 0.4072
22	PERIODICALS REGULAR & PERIODICALS NON-PROFIT	2,111,872	2,136,079	2,401,494	2,429,383	2,370,156	2,397,806	$ 0.2526	$ 0.2550
23	PERIODICALS REGULAR & PERIODICALS CLASSROOM	1,763,717	1,780,173	2,045,498	2,064,871	1,995,622	2,014,626	$ 0.2694	$ 0.2720
24	PERIODICALS REGULAR & STANDARD (A) NON-PROFIT	2,880,275	2,913,183	3,357,314	3,396,229	3,302,199	3,340,729	$ 0.1759	$ 0.1779
25	PERIODICALS REGULAR & STANDARD (B) ZONE RATE	2,611,506	2,643,036	3,109,416	3,147,854	3,033,746	3,071,384	$ 0.3827	$ 0.3875
26	PERIODICALS REGULAR & STANDARD (B) BPM	2,144,169	2,166,601	2,524,636	2,551,642	2,460,791	2,487,211	$ 0.3124	$ 0.3156
27	PERIODICALS NON-PROFIT & PERIODICALS CLASSROOM	376,137	378,176	384,565	386,669	402,605	404,836	$ 0.1911	$ 0.1921
28	PERIODICALS NON-PROFIT & STANDARD (A) NON-PROFIT	1,492,695	1,507,107	1,696,361	1,712,679	1,709,182	1,725,934	$ 0.1266	$ 0.1281
29	PERIODICALS NON-PROFIT & STANDARD (B) ZONE RATE	1,223,926	1,234,746	1,446,483	1,461,609	1,440,729	1,453,779	$ 0.5936	$ 0.5992
30	PERIODICALS NON-PROFIT & STANDARD (B) BPM	756,589	761,873	863,704	869,950	867,774	874,027	$ 0.3367	$ 0.3392
31	PERIODICALS CLASSROOM & STANDARD (A) NON-PROFIT	1,144,540	1,156,037	1,340,385	1,354,117	1,334,646	1,348,513	$ 0.1163	$ 0.1175
32	PERIODICALS CLASSROOM & STANDARD (B) ZONE RATE	875,771	883,187	1,092,487	1,101,892	1,066,193	1,075,395	$ 2.4642	$ 2.5057
33	PERIODICALS CLASSROOM & STANDARD (A) BPM	406,434	411,084	507,708	511,036	493,238	496,490	$ 0.6507	$ 0.6563
34	STANDARD (A) NON-PROFIT & STANDARD (B) ZONE RATE	1,992,329	2,012,242	2,404,303	2,429,404	2,372,770	2,397,747	$ 0.2011	$ 0.2032
35	STANDARD (A) NON-PROFIT & STANDARD (B) BPM	1,524,992	1,539,384	1,819,524	1,837,154	1,799,815	1,817,298	$ 0.1506	$ 0.1521
36	STANDARD (B) ZONE RATE & STANDARD (B) BPM	1,256,223	1,273,417	1,571,626	1,593,602	1,531,363	1,552,844	$ 1.7037	$ 1.7276
37	PERIODICALS:								
38	TOTAL PERIODICALS OUTSIDE COUNTY	2,125,863	2,150,361	2,415,778	2,443,980	2,384,192	2,412,210	$ 0.2521	$ 0.2550

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CHANGES TO USPS-LR-I-150

The constant elasticity calculation for the Cancel and Mail Preparation cost pool in C/S 3 Mail Processing was incorrect for Priority Mail. The formula was corrected in incremental cost workbook IC3-1.xls, worksheet Conselas, C12L11. BY 1998 Incremental cost for Priority Mail went from $ 2,696,914(000) to $2,693,697(000) after this correction was made. TY 2001 incremental cost for Priority Mail went from $3,406,568(000) to $3,402,686(000).

A complete list of all changes to the incremental cost model and other supporting materials follows.

Incremental Cost Model, in folder IC Model/R00-1

1. [IC3-1.xls]Conselas – Corrected formula for Priority Mail in C12L11.
2. [ICSummary.xls]Inputs PS – Corrected Data Source line to link to Data Source line in[IC_Forms.xls]Prod Spec
3. [IC_Forms.xls]IC-03.1 – Corrected title of worksheet.
4. [IC_Forms.xls]Product Specific MP – Corrected title of worksheet.
5. [IC14.xls]Cost Pools – Corrected formula for Correspondence mail in Intra-PDC cost pool, C4L55.

Incremental Cost Model, in folder IC Model/two-subclass

1. [IC07.xls]ConsElasLoad – Fixed denominator for letters and collections in Lines 3-38 of C6, C14, and C22 to include accrued cost for collections.
2. [IC07.xls]Access Sum – Corrected links to [IC07.xls]ConsElas in C7-C12. Had been linked to incorrect columns.
3. [TYARIC.xls]Vol-Related TY – Corrected formula for equipment interest in C122.
4. [TYBRIC.xls]Vol-Related TY – Corrected formula for equipment interest in C122.
5. [SPACE.xls]Burdens – Corrected formula for city carrier burden in C5.
6. [ICSummary.xls]Inputs PS 2SC – Corrected Data Source line to link to Data Source line in [IC_Forms.xls]Prod Spec.
7. [IC_Forms.xls]IC-03.1 – Corrected title of worksheet.
8. [IC_Forms.xls]Product Specific MP – Corrected title of worksheet.

Attachment A.xls, in folder Support Materials

1. Incremental costs in Tables 1A and 2A were updated for changes made to incremental cost model.

<u>WPTables.xls, in folder Support Materials</u>

1. Table 1, column labeled '**Type, as Defined in USPS-T-22, Table 1 [b]**'. The type was changed from six (6) to two (2) for several cost pools in cost segments 7 and 9. Corrections are marked in red type.

Revised Page of Witness Kay's Workpapers

Volume 1, Page 12 — In the last column, "Type, as Defined in USPS-T-22, Table 1[b]", the entries for certain cost pools in Segments 7 and 9 have been changed from "6" to "2". Every "2" in that column on the revised page was originally a "6".

TABLE 1
INDEPENDENT COMPONENTS - SOURCE OF VOLUME VARIABLE COST AND
INCREMENTAL COST TREATMENT, BY1998

Seg.	Cost Component/Description	CRA Model Component Number	Source of Cost Pool	Incremental Cost Treatment	IC Model Reference	Type, as Defined In USPS-T-22, Table 1 [b]
	City Carrier Street Access	48	USPS-T-11, Workpaper B:			
	Letter Route Access, SDR		WS 7.0.6.14 C5	SSS	IC07.xls	8
	Letter Route Access, MDR		WS 7.0.6.14 C11	SSS	IC07.xls	8
	Letter Route Access, BAM		WS 7.0.6.14 C17	SSS	IC07.xls	8
	Letter Route Time at Stop, SDR		WS 7.0.6.14 C6	SSS	IC07.xls	8
	Letter Route Time at Stop, MDR		WS 7.0.6.14 C12	SSS	IC07.xls	8
	Letter Route Time at Stop, BAM		WS 7.0.6.14 C18	SSS	IC07.xls	8
	Time at Stop Collect - LTR		WS 7.0.6 C7	CE	IC07.xls	8
	Access Collect LTR		WS 7.0.6 C15	CE	IC07.xls	8
	Time at Stop Collection EM Box LTR		WS 7.0.6 C8	PS	IC07.xls	2
	Access EM Box Collect LTR		WS 7.0.6 C16	PS	IC07.xls	2
	Time at Stop - SPR Deliveries		WS 7.0.6 C9	CE	IC07.xls	8
	Delivery Access-SPR		WS 7.0.6 C12	CE	IC07.xls	8
	Time at Stop - Collect SPR		WS 7.0.6 C10	CE	IC07.xls	8
	Access Collect SPR		WS 7.0.6 C13	CE	IC07.xls	8
	Time at Stop Collection EM Box SPR		WS 7.0.6 C11	PS	IC07.xls	2
	Access EM Box Collect SPR		WS 7.0.6 C14	PS	IC07.xls	2
	City Carrier Street Route	54	USPS-T-11, Workpaper B:			
	MLR Deviation Delivery		WS 7.0.6 C17	CE	IC07.xls	8
	MLR Loops/Dismounts		WS 7.0.6 C18	CE	IC07.xls	8
	Drop/PU Express Mail MLR		WS 7.0.4.4 C3L8	PS	IC07.xls	6
	Drop/PU Express Mail SPR		WS 7.0.5 C1L29+C2L29	PS	IC07.xls	6
8	Vehicle Drivers Personnel	57	R97-1, USPS-T-20			
	BMC Non-Spotter			CE	IC08.xls	8
	Plants			CE	IC08.xls	8
9	Special Delivery Messengers - Office	58	USPS-T-11, Workpaper B:			
	Mail-Related Office		WS 9.0.4 C6	IC=VVC	IC09.xls	7
	Special Delivery Messengers - Street	59	USPS-T-11, Workpaper B:			
	Ind Del Drive		WS 9.0.4 C1	CE	IC09.xls	8
	Ind Del Time at Stop		WS 9.0.4 C1	CE	IC09.xls	8
	Other Coll Access		WS 9.0.4 C2	CE	IC09.xls	8
	Other Coll Time at Stop		WS 9.0.4 C2	CE	IC09.xls	8
	Express Product Specific			PS	IC09.xls	
	Drop/PU Express Mail Facilities		WS 9.0.3 C5L7 + C7L7			6
	EM Collection Box Drive Costs		WS 9.0.3 C5L10			2
	Load EM Box		WS 9.0.4 C3	CE	IC09.xls	4
	Load Coll		WS 9.0.4 C3	CE	IC09.xls	8
	Del Cost Accntble		WS 9.0.4 C4	IC=VVC	IC09.xls	7
	Del Cost Non-Accntbl		WS 9.0.4 C5	IC=VVC	IC09.xls	7
	Special Delivery Fees	63		IC=VVC	ICSummary.xls	3
10	Rural Carriers					
	Evaluated Routes	69		IC=VVC	ICSummary.xls	1, 7
	Other Routes	70		IC=VVC	ICSummary.xls	1, 7
11	Clean & Protect	74	Distributed to cost pools using these distribution keys from CRA Model (USPS-T-11, WP A):			
	PO Boxes		1003	IC=VVC	Space.xls	3
	Priority		1004	IC=VVC	Space.xls	3
	Express		1005	IC=VVC	Space.xls	7

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Eric P. Koetting

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February 18, 2000