

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

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

NOTICE OF UNITED STATES POSTAL SERVICE
OF FILING OF ERRATA TO TESTIMONY OF WITNESS EGGLESTON
(USPS-T-26)

The United States Postal Service hereby files errata to USPS-T-26. An error in LR-I-105 was found while preparing the response to PSA/USPS-T26-4. Historically, in the RPW data files the variable "girth" was set equal to zero unless the parcel was non-rectangular. The data analyst did not know that this convention was changed in the FY1999 data. The result of this was a miscalculation of the average cube of oversize parcels in Postal Quarter 3, FY 1999. The program was rerun to calculate the correct average cubic feet. The average cubic feet of oversized parcels in column 15, on page 6 of Attachment A of USPS-T-26 was replaced with the revised number. This change flowed through the models presented in USPS-T-26 in several places. Revisions to the following pages of USPS-T-26 are attached.

page 9, line 32
page 14, line 9
Attachment A, pages 1, 6, 9, 12 and 15 of 15
Attachment C, page 1 of 1
Attachment D, page 1 of 1
Attachment G, pages 1 and 2 of 2
Attachment I, pages 1 and 2 of 2
Attachment J, page 1 of 1

Errata to LR-I-105 and LR-I-177 are being filed separately.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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1 the BMC. This means that they will incur additional costs associated with receiving a
2 sort at the plant. Since machinable parcels are sorted to 5-digits at the destination
3 BMC, they simply need to be crossdocked at the plant.

4 Another reason why NMOs are more expensive to process than machinable
5 parcels is that they are larger than machinable parcels. In BY98, the average size of a
6 NMO was 1.99 cubic feet and the average size of a machinable parcel was .58 cubic
7 feet. Since NMOs are larger than machinable parcels, fewer fit into each type of
8 container. This is reflected in the model through lower conversion factors. Since
9 conversion factors are used to unitize containerized costs, smaller conversion factors
10 will result in more costs being allocated to each parcel.

11 Table 2 on page 1 of Attachment A displays the modeled and adjusted modeled
12 costs of inter-BMC, intra-BMC and DBMC NMOs. Next, the adjusted modeled costs of
13 NMOs are compared to the adjusted modeled cost of machinable parcels for each of
14 the three rate categories. The estimated cost difference is used by Witness Plunkett to
15 derive the nonmachinable surcharge. The estimated cost differences for inter-BMC,
16 intra-BMC, and DBMC NMOs are 179.0, 117.3, and 127.7 cents respectively.

17 18 **3. Inter-BMC, Intra-BMC, and DBMC Oversize NMO Cost Difference.**

19 Oversize NMOs are parcels that have a length plus girth between 108 inches
20 and 130 inches. These parcels are more costly to handle than other NMOs for many of
21 the same reasons that NMOs are more costly to handle than machinable parcels.
22 Since oversize parcels are larger than other NMOs, fewer oversize parcels fit in each
23 type of container. This is reflected in the conversion factors shown on page 6 of
24 Attachment A. Since a smaller number of parcels fit into each container, the costs of
25 loading, unloading, and moving that container are distributed among a smaller number
26 of parcels. In addition, while some non-oversize NMOs may be sorted on mechanized
27 equipment, oversize parcels have to be sorted manually.

28 The adjusted modeled costs for inter-BMC, intra-BMC parcels and DBMC
29 oversize NMOs are shown in Table 2 on page 1 of Attachment A. Table 3 on the same
30 page shows the estimated cost differences between the adjusted modeled cost of
31 NMOs and oversize NMOs for each of the three rate categories. The estimated cost
32 differences for inter-BMC, intra-BMC, and DBMC are ~~826.4~~, ~~567.2~~ and ~~427.9~~ cents,

1 Therefore this testimony assumes that DBMC parcels avoid outgoing mail preparation
2 costs at facilities upstream of the BMC.

3 The outgoing mail processing costs that DBMC parcels avoid is shown in row 5
4 on page 2 of Attachment F. The appropriate piggyback factor has already been
5 incorporated into this cost. Next, the unit cost is calculated by dividing the total cost in
6 row 5 by the volume of Parcel Post that is entered upstream of BMC/ASF. This volume
7 is estimated on page 3 of Attachment F. Next, the unit cost in row 7 is multiplied by the
8 wage adjustment factor to derive the estimated mail processing costs avoided by
9 DBMC parcels, **15.7** cents.

11 2. BMC Presort

12 The estimated cost savings of BMC presort is shown on page 1 of Attachment G.
13 The cost savings are estimated by subtracting the modeled BMC presorted cost per
14 piece (column 2) from the modeled nonpresorted (inter-BMC) cost per piece (column
15 1).

16 The BMC presorted cost per piece is estimated on page 2 of Attachment G. It is
17 estimated using a methodology similar to the mail processing models discussed in
18 Section III of this testimony. The operations in the model have been changed to reflect
19 the fact that the BMC presorted parcels only need to be crossdocked at the origin BMC.
20 In addition, the conversion factors have been changed to reflect the BMC presort
21 requirements. Machinable parcels must be sorted in a 69 inch pallet box with a
22 minimum of 52 inches of mail in each, and NMOs must be sorted onto pallets with a
23 minimum of height of 42 inches of mail.¹¹

24 The estimated BMC presort unit cost savings is 23.2 cents.

¹⁰ Docket No.R97-1, USPS-RT-12.

¹¹ BMC presort requirement from DMM § M045.8.3. The cost analysis assumes that on average the pallet boxes and pallets will be filled halfway between the minimum requirement and the maximum fullness.

PARCEL POST MAIL PROCESSING COST SUMMARY AND DEVELOPMENT

Table 1: Nonmodel Cost Factor Development

| | | |
|-----------------------------|----|---------|
| Weighted Avg Model Cost | 1/ | \$0.840 |
| Proportional Cost Pools | 2/ | \$0.970 |
| CRA Proportional Adjustment | 3/ | 1.154 |
| CRA Fixed Adjustment | 4/ | \$0.307 |

Table 2: Total Cost Development

| | Model Cost [1] | Proportional Adjustment [2] | Fixed Adjustment [3] | Adjusted Cost [4] |
|------------------|----------------------|-----------------------------------|----------------------------|-------------------------|
| Inter Mach | \$1.206 | 1.154 | 0.307 | \$1.698 |
| Inter NMO | \$2.757 | 1.154 | 0.307 | \$3.488 |
| Inter NMO > 108" | \$8.368 | 1.154 | 0.307 | \$9.952 |
| Intra Mach | \$0.922 | 1.154 | 0.307 | \$1.371 |
| Intra NMO | \$1.939 | 1.154 | 0.307 | \$2.544 |
| Intra NMO > 108" | \$5.837 | 1.154 | 0.307 | \$7.042 |
| DBMC Mach | \$0.673 | 1.154 | 0.307 | \$1.084 |
| DBMC NMO | \$1.780 | 1.154 | 0.307 | \$2.361 |
| DBMC >108" | \$4.382 | 1.154 | 0.307 | \$5.363 |

Table 3: Unit Cost Difference Summary

| | Costs |
|--|-------------|
| Intra mach cost savings (compared to Inter mach) | 6/ \$0.328 |
| Cost Data to support NMO surcharge | |
| Inter NMO cost difference | 5/ \$1.790 |
| Intra NMO cost difference | 7/ \$1.173 |
| DBMC NMO cost difference | 8/ \$1.277 |
| Cost Data to support NMO >108 rate | |
| Inter NMO > 108 cost difference | 9/ \$8.264 |
| Intra NMO > 108 cost difference | 10/ \$5.672 |
| DBMC NMO > 108 cost difference | 11/ \$4.279 |

Sources

- Row 1/: Weighted average model costs from Attachment A pages 7 to 15.
Row 2/: Sum of CRA costs in proportional pools, Attachment A page 2 divided by 100 to convert to dollars.
Row 3/: Proportional cost pools divided by weighted averaged modeled costs.
Row 4/: Sum of CRA costs in fixed costs pools, Attachment A, page 2 divided by 100 to convert to dollars.
Row 5/: Total costs of inter NMO [4] minus total costs of inter mach [4].
Row 6/: Total costs of inter mach [4] - total costs of inter mach [4].
Row 7/: Total costs of intra NMO [4] minus total costs of intra mach [4].
Row 8/: Total cost of DBMC NMO [4] minus total cost of DBMC mach [4].
Row 9/: Total cost of inter mach > 108 [4] minus total cost of inter mach [4].
Row 10/: Total cost of intra NMO > 108 [4] minus total cost of intra mach [4].
Row 11/: Total cost of DBMC NMO>108 [4] minus total cost of DBMC mach [4].
Column [1]: Model costs from Attachment A, pages 7 to 15.
Column [2]: Proportional CRA adjustment factor = row (3).
Column [3]: Fixed CRA adjustment factor = row (4).
Column [4]: Total Costs = model costs times proportional adjustment plus fixed adjustment.

Conversion Factor Calculations

| Container Type | [1] | [2] | [3] | [4] | [5] | [6] |
|----------------------|---|--|-----------------------------|--|---|-------------------|
| | Outside Dim. Per Container (Inches) | Inside Dim. Per Container (Inches) | Cubic Feet Per Container | Effective Parcel Capacity (# of Parcels) | Capacity at Average Fullness (# of Parcels) | Average % FULL |
| Machinable | | | | | | |
| Pallet | 48x40x48 | 48x40x48 | 53.3 | 91.8 | 78.0 | 85% |
| Postal Pak | 48x40x69 | 46.5x38.5x69 | 71.5 | 111.9 | 95.1 | 85% |
| Pallet Box | 48x40x69 | 46.5x38.5x69 | 71.5 | 111.9 | 98.5 | 86% |
| Container | 65x41.5x36 | 65x41.5x36 | 58.2 | 88.0 | 74.8 | 85% |
| NMOs | | | | | | |
| Pallet | 48x40x48 | 48x40x48 | 53.3 | 26.8 | 26.8 | 100% |
| Presorted Pallet | 48x40x48 | 48x40x48 | 53.3 | 26.8 | 26.8 | 100% |
| In-house Container | 65x41.5x36 | 65x41.5x36 | 56.2 | 25.7 | 21.8 | 85% |
| Pallet Box | 48x40x69 | 46.5x38.5x69 | 71.5 | 32.6 | 27.7 | 85% |
| Oversize NMOs | | | | | | |
| 108"-130" on Pallet | 48x40x48 | 48x40x48 | 53.3 | 6.4 | 6.0 | 100% |
| 108"-130" in IHC | 65x41.5x36 | 65x41.5x36 | 58.2 | 6.4 | 6.4 | 100% |

| Pieces Per Container | [7] Machinable | | [9] Nonmachinable | | [11] 108"-130" |
|-------------------------|----------------|---------------|-------------------|---------------|----------------|
| | R84-1 FY82 | R01-1 FY98 | R84-1 FY82 | R01-1 FY98 | R01-1 FY98 |
| Sack | 7.92 | 5.1 | n/a | n/a | n/a |
| Sack in OTR | 126.7 | 81.8 | n/a | n/a | n/a |
| OTR | 106.9 | 69.0 | 42.0 | 27.1 | 6.7 |
| APC | 55.2 | 35.7 | 21.7 | 14.0 | 3.6 |
| Hamper | 35.6 | 23.0 | 14.0 | 9.0 | 2.2 |

| | [12] | [13] | [14] | [15] | [16] | [17] |
|------|------------|-------|-------|-----------|------------------------|-------------------------------|
| | Machinable | NMO | CRA | 108"-130" | No. of Sacks on IHC | No. of Sacks on Postal Pak |
| FY98 | 0.581 | 1.992 | 0.833 | 0.84 | 14.61 | 18.59 |
| FY82 | | | 0.538 | | | |

Sources

- Column [1]: Container Methods, Handbook PO-502 (September 1992), USPS LR-H-133.
- Column [2]: Container Methods, Handbook PO-502 (September 1992), USPS LR-H-133.
- Column [3]: (Length * width * height) / (12" * 12").
- Column [4]: (Column [3]) / ((column [13]) * air factor), to account for "effective cube" and (column [3]) / ((column [14]) * air factor) and (column [3]) / ((column [16]) * air factor).
Air factor = 1 for pallets, and 1.1 for all else.
- Column [5]: Effective cubic capacity (column [4]) * average % fullness (column [6]).
- Column [6]: Pallets, postal paks and IHCs should be as full as practicable before dispatch so it is reasonable to assume these containers will be at least 85% full.
The majority of pallet boxes come from mailers who must have 75 percent full boxes, and tend to fill them to maximize capacity.
Therefore 88 percent, the average of 75 and 100 percent was used.
- Column [7]: Docket No. R84-1, Exhibit USPS-141.
- Column [8]: Pieces per container in Docket No. R84-1 (column [7]) * FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [9]: Docket No. R84-1, Exhibit USPS-141.
- Column [10]: Pieces per container in Docket No. R84-1 (column [9]) * FY82 cubic feet per piece (column [14]) / FY98 cubic feet per piece (column [14]).
- Column [11]: Column [10] * column [13] / column [15].
- Column [12]: LR-4-105, Attachment E, FY98 machinable cubic feet / machinable pieces.
- Column [13]: LR-4-105, Attachment E, FY98 NMO cubic feet / NMO pieces.
- Column [14]: FY82 CRA, cubic feet / pieces. FY98 CRA, cubic feet / pieces.
- Column [15]: LR-1-105, Attachment H.
- Column [16]: No. of parcels on IHC (column 5) divided by no. of parcels in a sack (column 8).
- Column [17]: No. of parcels on a parcel (column 5) divided by no. of parcels in a sack (column 8).

Nonmachinable Nonpresort Inter-BMC Cost Development
Length plus Girth Between 108" and 130"

| | [1] # handlings | [2] units/hr | [3] conversion | [4] piggyback | [5] \$ per oper. | [6] \$ per facility |
|----------------------------------|--------------------|-----------------|-------------------|------------------|---------------------|------------------------|
| Origin SCF | | | | | | 1.2599 |
| Unload Containers ¹ | 1.0000 | | | | 0.4425 | 0.4425 |
| Bedload NMOs | 0.0400 | 176.6 | 1.0 | 1.65 | 0.2542 | 0.0102 |
| Load NMOs in OTRs | 0.7250 | 10.4 | 6.7 | 1.65 | 0.6418 | 0.4653 |
| Load NMOs in OWCs | 0.2220 | 10.4 | 2.9 | 1.65 | 1.5102 | 0.3353 |
| Load NMOs on Pallets | 0.0130 | 13.4 | 6.6 | 1.65 | 0.3054 | 0.0066 |
| Origin BMC | | | | | | 2.4655 |
| Unload Bedloaded to IHC | 0.0400 | 154.1 | 1.0 | 1.74 | 0.3078 | 0.0123 |
| Unload NMOs in OTRs | 0.7250 | 20.8 | 6.7 | 1.74 | 0.3359 | 0.2457 |
| Unload NMOs in OWC | 0.2220 | 20.8 | 2.9 | 1.74 | 0.7973 | 0.1770 |
| Unload NMOs on Pallets | 0.0130 | 12.3 | 6.6 | 1.74 | 0.5829 | 0.0076 |
| Move IHC | 0.0400 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.0195 |
| Move OTR | 0.7250 | 14.1 | 6.7 | 1.60 | 0.4806 | 0.3339 |
| Move OWC | 0.2220 | 14.1 | 2.9 | 1.60 | 1.0837 | 0.2406 |
| Move Pallets | 0.0130 | 14.1 | 6.6 | 1.60 | 0.4666 | 0.0061 |
| O. Primary NMO Sort | 1.0000 | 98.6 | 1.0 | 1.53 | 0.4225 | 0.4225 |
| Move Pallets | 1.0000 | 14.1 | 6.6 | 1.60 | 0.4666 | 0.4666 |
| Load NMOs on Pallets | 1.0000 | 13.4 | 6.6 | 1.74 | 0.5339 | 0.5339 |
| Destination BMC | | | | | | 2.3403 |
| Unload NMOs on Pallets | 1.0000 | 12.3 | 6.6 | 1.74 | 0.5829 | 0.5829 |
| Move Pallets | 1.0000 | 14.1 | 6.6 | 1.60 | 0.4666 | 0.4666 |
| D. Primary NMO Sort | 1.0000 | 98.6 | 1.0 | 1.53 | 0.4225 | 0.4225 |
| Move IHC | 0.0384 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.0187 |
| Move OTR | 0.1595 | 14.1 | 6.7 | 1.94 | 0.5563 | 0.0887 |
| Move Pallets | 0.3098 | 14.1 | 6.6 | 1.65 | 0.4806 | 0.1490 |
| Move OWC | 0.0074 | 14.1 | 2.9 | 1.74 | 1.1798 | 0.0097 |
| Bedload from IHC | 0.1291 | 176.6 | 1.0 | 1.74 | 0.2685 | 0.0347 |
| Load NMOs in OTRs | 0.5363 | 10.4 | 6.7 | 1.74 | 0.6780 | 0.3636 |
| Load NMOs on Pallet | 0.3098 | 13.4 | 6.6 | 1.74 | 0.5339 | 0.1654 |
| Load NMOs in OWC | 0.0248 | 10.4 | 2.9 | 1.74 | 1.5953 | 0.0396 |
| Destination SCF | | | | | | 1.9325 |
| Unload Bedload to IHC | 0.1061 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0309 |
| Unload OTRs | 0.4407 | 20.8 | 6.7 | 1.65 | 0.3206 | 0.1414 |
| Unload Pallet | 0.3098 | 12.3 | 6.6 | 1.65 | 0.5616 | 0.1709 |
| Unload OWC | 0.0151 | 20.8 | 2.9 | 1.65 | 0.7545 | 0.0114 |
| Move IHC | 0.1061 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.0633 |
| Move OTRs | 0.4407 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2092 |
| Move Pallet | 0.3098 | 14.1 | 6.6 | 1.65 | 0.4806 | 0.1490 |
| Move OWC | 0.0151 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.0166 |
| Manual Sort | 0.8717 | 433.0 | 1.0 | 1.50 | 0.0945 | 0.0824 |
| Move IHC | 0.2443 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.1226 |
| Move OTRs | 0.5069 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2406 |
| Move OWC | 0.1205 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.1846 |
| Bedload NMOs | 0.2443 | 176.6 | 1.0 | 1.65 | 0.2542 | 0.0621 |
| Load OTRs w/ loose | 0.5069 | 10.4 | 6.7 | 1.65 | 0.4816 | 0.3244 |
| Load Hampers/OWC | 0.1205 | 10.4 | 2.9 | 1.65 | 1.2902 | 0.1820 |
| Destination Delivery Unit | | | | | | 0.3694 |
| Unload Bedload NMOs | 0.2673 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0779 |
| Unload loose in OTR | 0.6025 | 20.8 | 6.7 | 1.65 | 0.3206 | 0.1933 |
| Unload OWC | 0.1302 | 20.8 | 2.9 | 1.65 | 0.7545 | 0.0643 |
| Total # of Sorts | 2.0000 | | | | Model Cost | \$3,367 |

Sources

- Column [1]: Attachment A, page 4, arrival and dispatch profiles.
- Column [2]: Attachment A, page 3, units per workhour.
- Column [3]: Attachment A, page 3, conversion factors.
- Column [4]: Attachment A, page 5, piggyback factors.
- Column [5]: (TY wage rate * column [4]) / (column [2] * column [3]).
- Column [6]: (column [1] * column [5]).

¹Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

Nonmachinable Nonpresort Inter-BMC Cost Development
Length plus Girth Between 108" and 130"

| | [1] # handlings | [2] units/hr | [3] conversion | [4] piggyback | [5] \$ per oper. | [6] \$ per facility |
|----------------------------------|--------------------|-----------------|-------------------|------------------|---------------------|------------------------|
| Origin SCF | | | | | | 1.2599 |
| Unload Containers ¹ | 1.0000 | | | | 0.4425 | 0.4425 |
| Bedload NMOs | 0.0400 | 176.6 | 1.0 | 1.65 | 0.2542 | 0.0102 |
| Load NMOs in OTRs | 0.7250 | 10.4 | 6.7 | 1.65 | 0.6418 | 0.4653 |
| Load NMOs in OWCs | 0.2220 | 10.4 | 2.9 | 1.65 | 1.6102 | 0.3353 |
| Load NMOs on Pallets | 0.0130 | 13.4 | 6.8 | 1.65 | 0.5054 | 0.0066 |
| Destination BMC | | | | | | 2.2511 |
| Unload Bedloaded to IHC | 0.0400 | 154.1 | 1.0 | 1.74 | 0.3078 | 0.0123 |
| Unload NMOs in OTRs | 0.7250 | 20.8 | 6.7 | 1.74 | 0.3388 | 0.2457 |
| Unload NMOs in OWC | 0.2220 | 20.8 | 2.9 | 1.74 | 0.7978 | 0.1770 |
| Unload NMOs on Pallets | 0.0130 | 12.3 | 6.8 | 1.74 | 0.5829 | 0.0076 |
| Move IHC | 0.0400 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.0195 |
| Move OTR | 0.7250 | 14.1 | 6.7 | 1.60 | 0.4606 | 0.3339 |
| Move OWC | 0.2220 | 14.1 | 2.9 | 1.60 | 1.0837 | 0.2406 |
| Move Pallet | 0.0130 | 14.1 | 6.8 | 1.60 | 0.4686 | 0.0061 |
| D. Primary NMO Sort | 1.0000 | 98.6 | 1.0 | 1.53 | 0.4225 | 0.4225 |
| Move IHC | 0.0119 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.0058 |
| Move OTR | 0.2156 | 14.1 | 6.7 | 1.60 | 0.4806 | 0.0993 |
| Move OWC | 0.0660 | 14.1 | 2.9 | 1.60 | 1.0637 | 0.0716 |
| Move Pallet | 0.0130 | 14.1 | 6.8 | 1.60 | 0.4686 | 0.0061 |
| Bedload from IHC | 0.1291 | 176.6 | 1.0 | 1.74 | 0.2685 | 0.0347 |
| Load NMOs in OTRs | 0.5363 | 10.4 | 6.7 | 1.74 | 0.6780 | 0.3836 |
| Load NMOs on Pallet | 0.3098 | 13.4 | 6.8 | 1.74 | 0.5339 | 0.1654 |
| Load NMOs in OWC | 0.0248 | 10.4 | 2.9 | 1.74 | 1.5953 | 0.0396 |
| Destination SCF | | | | | | 1.9568 |
| Unload Bedload to IHC | 0.1061 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0309 |
| Unload OTRs | 0.4407 | 20.8 | 6.7 | 1.65 | 0.3208 | 0.1414 |
| Unload Pallet | 0.3098 | 12.3 | 6.8 | 1.65 | 0.5518 | 0.1709 |
| Unload OWC | 0.0204 | 20.8 | 2.9 | 1.65 | 0.7548 | 0.0154 |
| Move IHC | 0.1061 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.0533 |
| Move OTRs | 0.4407 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2092 |
| Move Pallet | 0.3098 | 14.1 | 6.8 | 1.65 | 0.4806 | 0.1490 |
| Move OWC | 0.0204 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.0228 |
| Manual Sort | 0.8770 | 433.0 | 1.0 | 1.50 | 0.0945 | 0.0829 |
| Move IHC | 0.2443 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.1228 |
| Move OTRs | 0.5069 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2406 |
| Move OWC | 0.1258 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.1405 |
| Bedload NMOs | 0.2443 | 176.6 | 1.0 | 1.65 | 0.2542 | 0.0621 |
| Load OTRs w/ loose | 0.5069 | 10.4 | 6.7 | 1.65 | 0.6418 | 0.3354 |
| Load Hampers/OWC | 0.1258 | 10.4 | 2.9 | 1.65 | 1.5102 | 0.1900 |
| Destination Delivery Unit | | | | | | 0.3694 |
| Unload Bedload NMOs | 0.2673 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0779 |
| Unload loose in OTR | 0.6025 | 20.8 | 6.7 | 1.65 | 0.3208 | 0.1633 |
| Unload OWC | 0.1302 | 20.8 | 2.9 | 1.65 | 0.7548 | 0.0983 |
| Total # of Sorts | 1.0000 | | | | Model Cost | \$5.8372 |

Sources

- Column [1]: Attachment A, page 4, arrival and dispatch profiles.
- Column [2]: Attachment A, page 3, units per workhour.
- Column [3]: Attachment A, page 3, conversion factors.
- Column [4]: Attachment A, page 5, piggyback factors.
- Column [5]: (TY wage rate * column [4]) / (column [2] * column [3]).
- Column [6]: (column [1] * column [5]).

¹Unload Containers cost at OSCF uses the average cost of unloading containers at origin BMC as proxy.

Nonmachinable DBMC Model Cost Summary¹
Length plus Girth Between 108" and 130"

| | [1] # handlings | [2] units/hr | [3] conversion | [4] piggyback | [5] \$ per oper. | [6] \$ per facility |
|----------------------------------|--------------------|-----------------|-------------------|-------------------|---------------------|------------------------|
| Destination BMC | | | | | | 2.0555 |
| Unload Bedload | 0.9850 | 161.4 | 1.0 | 1.74 | 0.2940 | 0.2895 |
| Unload Pallets ² | 0.0150 | 12.3 | 6.6 | 1.74 | 0.5829 | 0.0087 |
| Move IHC (from bedload) | 0.9850 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.4798 |
| Move Pallets | 0.0150 | 14.1 | 6.6 | 1.60 | 0.4666 | 0.0070 |
| D. Primary NMO Sort | 1.0000 | 98.6 | 1.0 | 1.53 | 0.4225 | 0.4225 |
| Move IHCs | 0.0384 | 14.1 | 6.4 | 1.60 | 0.4871 | 0.0187 |
| Move OTRs | 0.1595 | 14.1 | 6.7 | 1.60 | 0.4606 | 0.0735 |
| Move Pallets | 0.3098 | 14.1 | 6.6 | 1.60 | 0.4666 | 0.1445 |
| Move OWCs | 0.0074 | 14.1 | 2.9 | 1.60 | 1.0837 | 0.0080 |
| Bedload from IHC | 0.1291 | 176.6 | 1.0 | 1.74 | 0.2685 | 0.0347 |
| Load NMOs in OTRs | 0.5363 | 10.4 | 6.7 | 1.74 | 0.6780 | 0.3636 |
| Load NMOs on Pallet | 0.3098 | 13.4 | 6.6 | 1.74 | 0.5339 | 0.1654 |
| Load NMOs in OWC | 0.0248 | 10.4 | 2.9 | 1.74 | 1.5953 | 0.0396 |
| Destination SCF | | | | | | 1.9568 |
| Unload Bedload to IHC | 0.1061 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0309 |
| Unload OTRs | 0.4407 | 20.8 | 6.7 | 1.65 | 0.3208 | 0.1414 |
| Unload Pallet | 0.3098 | 12.3 | 6.6 | 1.65 | 0.5518 | 0.1709 |
| Unload OWC | 0.0204 | 20.8 | 2.9 | 1.65 | 0.7548 | 0.0154 |
| Move IHC | 0.1061 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.0533 |
| Move OTRs | 0.4407 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2092 |
| Move Pallet | 0.3098 | 14.1 | 6.6 | 1.65 | 0.4808 | 0.1490 |
| Move OWC | 0.0204 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.0228 |
| Manual Sort | 0.8770 | 433.0 | 1.0 | 1.50 | 0.0945 | 0.0829 |
| Move IHC | 0.2443 | 14.1 | 6.4 | 1.65 | 0.5020 | 0.1226 |
| Move OTRs | 0.5069 | 14.1 | 6.7 | 1.65 | 0.4747 | 0.2406 |
| Move OWC | 0.1258 | 14.1 | 2.9 | 1.65 | 1.1168 | 0.1405 |
| Bedload NMOs | 0.2443 | 176.6 | 1.0 | 1.65 | 0.2542 | 0.0621 |
| Load OTRs w/ loose | 0.5069 | 10.4 | 6.7 | 1.65 | 0.8418 | 0.3254 |
| Load Hampers/OWC | 0.1258 | 10.4 | 2.9 | 1.65 | 1.5102 | 0.1900 |
| Destination Delivery Unit | | | | | | 0.3694 |
| Unload Bedload NMOs | 0.2673 | 154.1 | 1.0 | 1.65 | 0.2914 | 0.0779 |
| Unload loose in OTR | 0.6025 | 20.8 | 6.7 | 1.65 | 0.3208 | 0.1933 |
| Unload OWC | 0.1302 | 20.8 | 2.9 | 1.65 | 0.7548 | 0.0983 |
| Total # of Sorts | 1.0000 | | | Model Cost | | \$4,3818 |

Sources

- Column [1]: Attachment A, page 4, arrival and dispatch profiles.
- Column [2]: Attachment A, page 3, units per workhour.
- Column [3]: Attachment A, page 3, conversion factors.
- Column [4]: Attachment A, page 5, piggyback factors.
- Column [5]: (TY wage rate * column [4]) / (column [2] * column [3]).
- Column [6]: (column [1] * column [5]).

¹DBMC model costs are calculated in this testimony for the sole purpose of comparing an average Parcel Post model cost to the CRA parcel post mail processing cost pools in order to calculate the CRA proportional adjustment factor.

²Assumes oversize parcels will not arrive in pallet boxes, so # of handling for pallets and pallet boxes were combined.

Non-Transportation Cost Savings Summary

| Rate Category | | Modeled Cost Difference |
|--|-----|--------------------------------|
| BMC Presort Modeled Cost Savings | 1/ | \$0.232 |
| DBMC Cost savings | 2/ | \$0.662 |
| Window Acceptance Modeled Cost Savings | 3/ | \$0.105 |
| Mail Processing Modeled Cost Savings | 4/ | \$0.557 |
| OBMC | 5/ | \$0.894 |
| Window Acceptance Modeled Cost Savings | 6/ | \$0.105 |
| Mail Processing Modeled Cost Savings | 7/ | \$0.557 |
| BMC Presort Modeled Cost Savings | 8/ | \$0.232 |
| DSCF | | |
| Modeled Cost Savings | 9/ | \$0.428 |
| Additional Cost of Oversize (DSCF oversize NMO modeled cost -DSCF mach modeled cost) | 10/ | 2.374 |
| DDU | | |
| Weighted average of DDU mach and NMO modeled cost savings. | 11/ | \$0.730 |
| NMO oversize DDU Modeled Cost Savings (compared to DBMC) | 12/ | 2.382 |

Sources

- Row 1/: Attachment G, page 1, row 6.
- Row 2/: Row (3) + row (4).
- Row 3/: Attachment F, page 1, row 16.
- Row 4/: Attachment F, page 2, row 10.
- Row 5/: Row (6) + row (7) + row (8).
- Row 6/: Attachment H, page 1, row 1.
- Row 7/: Attachment H, page 1, row 2.
- Row 8/: Attachment H, page 1, row 3.
- Row 9/: Attachment I, page 1, row 12.
- Row 10/: Attachment I, page 1, row 9
- Row 11/: Attachment J, page 1, row 4.
- Row 12/: Attachment J, page 1, row 5.

INPUTS FOR DROPSHIP MODELS

Inputs for Dropship Models

| Proportion of Volume | Mach | NMO | |
|-----------------------------------|------|-------|----|
| DBMC | 0.95 | 0.05 | 1/ |
| DSCF | 0.95 | 0.05 | 2/ |
| Inter-BMC | 0.92 | 0.08 | 3/ |
| Intra-BMC | 0.92 | 0.08 | 4/ |
| Piggyback Factors | | | |
| Window Service | | 1.450 | 5/ |
| Wage Adjustment Factor | | | |
| window service | | 1.124 | 6/ |
| mail processing | | 1.124 | 7/ |
| Average number of Sacks on an IHC | | 14.6 | 8/ |

DSCF specific inputs

| | | | | |
|--|--------|------|------|----------|
| Proportion of DSCF dropped at BMCs | 12.30% | 9/ | | |
| Proportion of DSCF using requirements | | | | |
| Sacks | | Mach | NMO | Over 108 |
| | | 0 | 0 | N/A 10/ |
| Pallet and Pallet Boxes | | 1 | 1 | N/A 11/ |
| Average Number of parcels | | | | |
| Sacks | | Mach | NMO | Over 108 |
| | | 10 | N/A | N/A 12/ |
| Pallet and pallet boxes | | 62.1 | 22.5 | 13/ |

Calculation of Average # of Parcels on a Pallet

| | Min [1] | Max [2] | Average [3] |
|-------------------------------------|------------|------------|----------------|
| Mach | | | |
| Pallet (min 36, max 48") | 68.90 | 91.8 | 75.8 |
| Pallet Box (min 36 ", max 60") | 58.40 | 97.3 | 70.1 |
| Pallet (ave 50) | | | 50.0 |
| Pallet box (ave 50) | | | 50.0 |
| Pallet (min 50 pieces , max 48") | 50 | 91.8 | 62.5 |
| Pallet Box (min 50 pieces, max 60") | 50 | 97.3 | 64.2 |
| Average Mach | | | 62.1 |
| NMO | | | |
| Pallet (min 36" max 48") | 20.1 | 26.8 | 23.5 |
| Pallet Box (min 36 " max 60") | 14.5 | 28.4 | 21.5 |
| Average NMO | | | 22.5 |
| Overize | | | |
| Pallet (min 36" max 48") | 5.0 | 6.5 | 5.8 |
| Average Overize | | | 5.8 |

Sources

- Row 1/: LR-I-105. Machinable DBMC volume / total DBMC volume and NMO DBMC volume/total DBMC volume.
 Row 2/: Assume same percent as DBMC.
 Row 3/: LR-I-105. Machinable Inter-BMC volume / total Inter-BMC volume and NMO inter- BMC volume/total Inter-BMC volume.
 Row 4/: LR-I-105. Machinable intra-BMC volume / total intra-BMC volume and NMO intra- BMC volume/total intra-BMC volume.
 Row 5/: USPS-T-21, Attachment 10, BY piggyback factor.
 Row 6/: LR-I-106, TY wage rate / BY wage rate.
 Row 7/: LR-L-106, TY wage rate/ BY wage rate.
 Row 8/: Attachment A, page 6, column [16].
 Row 9/: Percent of Volume with direct transportation to delivery units.
 Row 10/: Area Coordinators reported no use of sacks for DSCF discount.
 Row 11/: Area Coordinators reported that all mailers used pallets for DSCF discount.
 Row 12/: Assumption behind requirement (due to zero handlings, not used).
 Row 13/: Developed Below. Average of different requirement.
- Column [1]: Calculated using model in Attachment A, page 6.
 Column [2]: Calculated using model in Attachment A, page 6.
 Column [3]: Weighted average of column [1] and column [2].
 For machinable, weights minimum by 0.7 and maximum by 0.3.
 For NMO< weights both machinable and NMO by 0.5

BMC Presort Parcel Post Cost Savings

| Operation | [1] Nonpresorted Cost/Piece | [2] BMC Presorted Cost/Piece | [3] Difference (Savings) |
|--|-----------------------------------|---------------------------------------|--------------------------------|
| Machinable Parcel Post | | | |
| Origin BMC unload | \$0.0470 | \$0.0394 | \$0.0076 |
| Origin BMC | \$0.2797 | \$0.0631 | \$0.2166 |
| Origin BMC Load | \$0.0372 | \$0.0361 | \$0.0011 |
| DBMC Unload | \$0.0407 | \$0.0394 | \$0.0012 |
| BMC Savings | | | 1/ \$0.2266 |
| Nonmachinable Parcel Post | | | |
| Origin BMC unload | \$0.1183 | \$0.1540 | -\$0.0357 |
| Origin BMC | \$0.5963 | \$0.2466 | \$0.3497 |
| Origin BMC Load | \$0.1323 | \$0.1411 | -\$0.0088 |
| DBMC Unload | \$0.1444 | \$0.1540 | -\$0.0097 |
| BMC Savings | | | 2/ \$0.2955 |
| Oversize Parcel Post | | | |
| Origin BMC unload | \$0.4425 | \$0.6236 | -\$0.1811 |
| Origin BMC | \$1.4891 | \$0.9984 | -\$0.4907 |
| Origin BMC Load | \$0.5339 | \$0.5712 | -\$0.0373 |
| DBMC Unload | \$0.5829 | \$0.6236 | -\$0.0408 |
| BMC Savings | | | 3/ \$0.2315 |
| Proportion of Inter-BMC volume that is Machinable | 4/ | | 0.92 |
| Proportion of Inter-BMC volume that is Nonmachinable | 5/ | | 0.08 |
| Total BMC Presort Related Savings | 6/ | | \$0.232 |

Sources

Column [1]: Attachment A, pages 7-9.

Column [2]: Attachment G, page 2, column 6.

Row 1/: Sum of cost savings for machinable Parcel Post.

Row 2/: Sum of cost savings for nonmachinable Parcel Post.

Row 3/: Sum of cost savings for oversize nonmachinable Parcel Post.

Row 4/: Machinable inter-BMC volume divided by total inter-BMC volume.

Row 5/: Nonmachinable inter-BMC volume divided by total nonmachinable inter-BMC volume.

Row 6/: [Row (4) * machinable BMC Savings] + [row (5) * nonmachinable BMC savings].

BMC PRESORTED PARCEL POST COST PER PIECE

| Operation | [1] # handling | [2] units/hr | [3] conversion | [4] piggyback | [5] \$ per oper | [6] cost |
|----------------------------------|-------------------|-----------------|-------------------|------------------|--------------------|-------------|
| Machinable BMC Presort | | | | | | |
| Origin BMC | | | | | | |
| Unload Pallet Box | 1.0000 | 12.3 | 98.1 | 1.74 | \$0.0394 | \$0.0394 |
| Crossdock Pallet Box | 1.0000 | 7.0 | 98.1 | 1.60 | \$0.0631 | \$0.0631 |
| Load Pallet Box | 1.0000 | 13.4 | 98.1 | 1.74 | \$0.0361 | \$0.0361 |
| Destination BMC | | | | | | |
| Unload Pallet Box | 1.0000 | 12.3 | 98.1 | 1.74 | \$0.0394 | \$0.0394 |
| Nonmachinable BMC Presort | | | | | | |
| Origin BMC | | | | | | |
| Unload Pallets | 1.0000 | 12.3 | 25.1 | 1.74 | \$0.1540 | \$0.1540 |
| Crossdock Pallets | 1.0000 | 7.0 | 25.1 | 1.60 | \$0.2466 | \$0.2466 |
| Load NMOs Pallets | 1.0000 | 13.39 | 25.1 | 1.74 | \$0.1411 | \$0.1411 |
| Destination BMC | | | | | | |
| Unload Pallets | 1.0000 | 12.27 | 25.1 | 1.74 | \$0.1540 | \$0.1540 |
| Oversize Parcels | | | | | | |
| Origin BMC | | | | | | |
| Unload Pallets | 1.0000 | 12.3 | 6.2 | 1.74 | \$0.6236 | \$0.8236 |
| Crossdock Pallets | 1.0000 | 7.0 | 6.2 | 1.60 | \$0.9984 | \$0.9984 |
| Load NMOs Pallets | 1.0000 | 13.4 | 6.2 | 1.74 | \$0.5712 | \$0.5712 |
| Destination BMC | | | | | | |
| Unload Pallets | 1.0000 | 12.3 | 6.2 | 1.74 | \$0.6236 | \$0.6236 |

Sources

Column [1]: Each handled only one time.

Column [2]: Attachment A, page 3, units per workhour.

Column [3]: Conversion factor. Reflects the average between the minimum requirements and maximum fullness.
'Mach min 52", max 69". NMO min 42", max 48 ". Oversize min 42", max 48".

Column [4]: LR-I-77, test year operation specific piggyback factors.

Column [5]: (Wage rate * column [4]) / (column [2] * column [3]).

Column [6]: Column [5] * column [1].

Summary of DSCF Savings (compared to DBMC)

DBMC Mailprocessing modeled Costs

| | | |
|----------|---------|----|
| Mach | \$0.673 | 1/ |
| NMO | \$1.780 | 2/ |
| Over 108 | \$4.382 | 3/ |

DSCF Modeled Costs

| | | |
|------------|---------|----|
| Machinable | \$0.272 | 4/ |
| NMO | \$0.753 | 5/ |
| Over 108 | \$2.916 | 6/ |

DSCF Cost Savings

| | | |
|------------|---------|----|
| Machinable | \$0.401 | 7/ |
| NMO | \$1.027 | 8/ |

Additional Cost of over 108 compared to average DSCF Parcel \$2.623 9/

| | | |
|--------------------|------|-----|
| Proportion of Mach | 0.95 | 10/ |
| Proportion of NMO | 0.05 | 11/ |

Average DSCF Cost Savings (no oversize) \$0.428 12/

Sources

- Row 1/: Attachment A, page 13, modeled cost of machinable DBMC.
- Row 2/: Attachment A, page 14, modeled cost of nonmachinable DBMC.
- Row 3/: Attachment A, page 15, modeled cost of oversize nonmachinable DBMC.
- Row 4/: Attachment I, page 2, modeled cost of machinable DSCF.
- Row 5/: Attachment I, page 2, modeled cost of nonmachinable DSCF.
- Row 6/: Attachment I, page 2, modeled cost of oversize nonmachinable DSCF.
- Row 7/: Row (1) - row (4).
- Row 8/: Row (2) - row (5).
- Row 9/: Row (6) - [row (4) * row (10) + row (5) * row (11)].
- Row 10/: Attachment D, page 1, row 2.
- Row 11/: Attachment D, page 1, row 2.
- Row 12/: [Row (7) * row (10)] + [row (8) * row (11)].

DSCF Model Cost Summary

| | [1] # handlings | [2] units/hr | [3] conversion | [4] piggyback | [5] \$ per oper. | [6] \$ per facility |
|----------------------------------|--------------------|-----------------|-------------------|------------------|---------------------|------------------------|
| MACHINABLE | | | | | | |
| Destination BMC | | | | | | \$0.0269 |
| Unload Pallet/Pallet Box | 0.1230 | 12.3 | 62.1 | 1.74 | \$0.0623 | \$0.0077 |
| Cross dock Pallet/Pallet Box | 0.1230 | 7.0 | 62.1 | 1.60 | \$0.0997 | \$0.0123 |
| Load Pallet/Pallet Box | 0.1230 | 13.4 | 62.1 | 1.74 | \$0.0570 | \$0.0070 |
| Destination SCF | | | | | | \$0.1865 |
| Unload Pallet/Pallet Box | 0.8770 | 12.3 | 62.1 | 1.65 | \$0.0589 | \$0.0517 |
| Unload Bedloaded Sacks | 0.0000 | 154.1 | 10.0 | 1.65 | \$0.0291 | \$0.0000 |
| Crossdock Pallet/Pallet Box | 0.8770 | 7.0 | 62.1 | 1.60 | \$0.0997 | \$0.0874 |
| Crossdock bedloaded sacks | 0.0000 | 7.0 | 146.1 | 1.60 | \$0.0424 | \$0.0000 |
| Load Pallet/Pallet Box | 0.8770 | 13.4 | 62.1 | 1.65 | \$0.0540 | \$0.0474 |
| Bedload Sacks | 0.0000 | 182.5 | 10.0 | 1.65 | \$0.0246 | \$0.0000 |
| Destination Delivery Unit | | | | | | \$0.0589 |
| Unload Pallet/Pallet Box | 1.0000 | 12.3 | 62.1 | 1.65 | \$0.0589 | \$0.0589 |
| Unload Bedloaded Sacks | 0.0000 | 154.1 | 10.0 | 1.65 | \$0.0291 | \$0.0000 |
| Dump Sacks | 0.0000 | 110.9 | 10.0 | 1.65 | \$0.0405 | \$0.0000 |
| TOTAL | | | | | | \$0.2724 |
| NONMACHINABLE | | | | | | |
| Destination BMC | | | | | | \$0.0745 |
| Unload Pallet/Pallet Box | 0.1230 | 12.3 | 22.5 | 1.74 | \$0.1722 | \$0.0212 |
| Crossdock Pallet/Pallet Box | 0.1230 | 7.0 | 22.5 | 1.60 | \$0.2757 | \$0.0339 |
| Load Pallet/Pallet Box | 0.1230 | 13.4 | 22.5 | 1.74 | \$0.1578 | \$0.0194 |
| Destination SCF | | | | | | \$0.5158 |
| Unload Pallet/Pallet Box | 0.8770 | 12.3 | 22.5 | 1.65 | \$0.1630 | \$0.1430 |
| Crossdock Pallet/Pallet Box | 0.8770 | 7.0 | 22.5 | 1.60 | \$0.2757 | \$0.2418 |
| Load Pallet/Pallet Box | 0.8770 | 13.4 | 22.5 | 1.65 | \$0.1493 | \$0.1310 |
| Destination Delivery Unit | | | | | | \$0.1630 |
| Unload Pallet/Pallet Box | 1.0000 | 12.3 | 22.5 | 1.65 | \$0.1630 | \$0.1630 |
| TOTAL | | | | | | \$0.7533 |
| OVERSIZE | | | | | | |
| Destination BMC | | | | | | \$0.2884 |
| Unload Pallets | 0.1230 | 12.3 | 5.8 | 1.74 | \$0.6866 | \$0.0820 |
| Cross dock pallets | 0.1230 | 7.0 | 5.8 | 1.60 | \$1.0673 | \$0.1313 |
| Load Pallets | 0.1230 | 13.4 | 5.8 | 1.74 | \$0.6106 | \$0.0761 |
| Destination SCF | | | | | | \$1.9964 |
| Unload Pallets | 0.8770 | 12.3 | 5.8 | 1.65 | \$0.6311 | \$0.5535 |
| Crossdock Pallets | 0.8770 | 7.0 | 5.8 | 1.60 | \$1.0673 | \$0.9360 |
| Load Pallets | 0.8770 | 13.4 | 5.8 | 1.65 | \$0.5780 | \$0.5059 |
| Destination Delivery Unit | | | | | | \$0.6311 |
| Unload Pallets | 1.0000 | 12.3 | 5.8 | 1.65 | \$0.6311 | \$0.6311 |
| TOTAL | | | | | | \$2.9160 |

Weighted Average of DSCF mach and NMO **\$0.2932**

Sources

- Column [1]: Attachment D, page 1, row 9.
- Column [2]: Attachment A, page 3, units per workhour.
- Column [3]: Attachment D, page 1, row 13.
- Column [4]: Attachment A, page 5, piggyback factors.
- Column [5]: (Adjusted wage rate * column [4]) / (column [2] * column [3]).
- Column [6]: (Column [1]) * (column [5]).

DDU Cost Savings

| | | Modeled Costs | | |
|---|----|---------------|---------|----------|
| | | Mach | NMO | Over 108 |
| Costs Avoided by DDU | 1/ | \$0.673 | \$1.780 | \$4,382 |
| Percent of Mach | 2/ | 0.95 | | |
| Percent of NMO | 3/ | 0.05 | | |
| Average DDU Cost Savings (no oversize) | | | | |
| | 4/ | \$0.730 | | |
| Oversize DDU Cost Savings | | | | |
| | 5/ | | | \$4,382 |

Sources

- Row 1/: Attachment A, page 13 to 15, modeled DBMC costs.
- Row 2/: Attachment D, page 1, row 2.
- Row 3/: Attachment D, page 1, row 2.
- Row 4/: Machinable cost avoided * percent of machinable [row (2)] + NMO cost avoided * percent of NMO [row (3)].
- Row 5/: Oversize cost avoided in row (1).

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.

A handwritten signature in black ink, appearing to read "Scott Reiter", is written above a solid horizontal line.

Scott L. Reiter

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
March 22, 2000