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

POSTAL RATE AND FEE CHANGES, 2000   Docket No. R2000–1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS DEGEN TO INTERROGATORY OF
MAGAZINE PUBLISHERS OF AMERICA
(MPA/USPS–T16–17)

The United States Postal Service hereby provides the response of witness

Degen to the following interrogatory of Magazine Publishers of America:
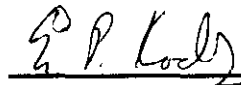
MPA/USPS–T16-17, filed on April 17, 2000.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 28, 2000

MPA/USPS-T16-17. Please refer to your response to MPA/USPS-T16-14(f), in which you state that: "'Broad' distribution of mixed-mail across cost pools, in the context of a distribution methodology that makes appropriate use of the information contained in item and container tallies, may be justifiable...."

a. Please state whether you had a distribution methodology in mind when you made the quoted statement.

b. If the answer to part (a) is affirmative, please specify the nature of the "'broad' distribution of mixed mail cost pools" and the "appropriate use of the information contained in item and container tallies."

c. Please provide the volume-variable costs by cost pool and subclass resulting from the distribution methodology described in response to part (b), in a format comparable to Table 3 at USPS-T-17. Please also provide an electronic (Excel) version.

d. Please provide the SAS code used to generate the response to part (c) in hard copy and electronic form.

MPA/USPS–T16–17 Response.

a. I did not have a specific mixed-mail distribution method in mind when I made the quoted statement. However, I had considered some general types of modifications to the mixed-mail procedures, which I describe in the response to part (b).

b. I considered two general types of modifications to the mixed-mail procedures implemented by the Postal Service for the BY 1998 mail processing subclass distribution keys. First, the "broader" mixed-mail procedures employed for the MODS and BMC Platform cost pools could be extended to other allied labor cost pools. Second, for the MODS office group, the "broader" distribution of mixed-mail for the Platform (and, potentially, other allied labor cost pools) could be extended to additional non-allied labor cost pools. In any case, the

use of shape, item, or container information in the Postal Service's methods

would be preserved. These types of modifications encompass a large

number of specific alternative mixed-mail methods, which I have not

considered individually. However, I specify what I believe to be the "broadest"

acceptable mixed-mail distribution method in the table provided as

Attachment 1 to this response. The results that I present in response to parts

(c) and (d) employ this method.

c. Estimated volume-variable costs and distribution key shares, based on

Fortran versions of the programs that compute volume-variable costs by

subclass, are provided in Attachment 2 and Attachment 3 to this response.

The requested Excel file will be provided in library reference USPS-LR-I-313.

d. SAS code that performs the same function as the Fortran programs used to

produce the results in Attachment 2 and Attachment 3 will be provided in

library reference USPS-LR-I-313.

Cost Pool Group	"Broader" distribution in USPS Base Year method	"Broadest" acceptable method
MODS	"Identified" containers in Platform cost pool are "filled" using piece- and item-handling direct tallies in all allied labor cost pools	• Broaden set of cost pools used to fill Platform identified container tallies to the set of cost pools used to distribute MODS allied labor not-handling tallies[1] • Extend the broadened treatment of identified container tallies in the Platform cost pool to identified container tallies in other allied labor cost pools, except Cancellation/Meter Prep[2] • Extend the broadened treatment of identified container tallies in allied labor cost pools (except Cancellation/Meter Prep) to tallies of mixed single items in allied labor cost pools
BMC	Mixed single items and identified containers in Platform cost pool are filled using piece- and item-handling direct tallies in all BMC cost pools	Extend the treatment of mixed single item and identified container tallies in the Platform cost pool to the BMC allied labor cost pool (USPS-T-17 SAS Code "OTHR")
Non-MODS	Mixed identified containers in Allied cost pool are filled using piece- and item-handling direct tallies in all non-MODS cost pools except Registry and Miscellaneous	Extend the treatment of identified container tallies in the Platform to tallies of mixed single items

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[1] Note that the set of cost pools used to distribute MODS allied labor not-handling tallies is the set of Function 1 cost pools (except 1Misc, 1Support, Registry, and BusReply) plus LDC 79. See USPS-T-17 and LR-I-106 for details.

[2] Note that I intend that the set of allied labor cost pools include the mechanized sack sorting cost pool in LDC 13, in addition to the LDC 17 cost pools excluding Cancellation/Meter Prep.

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

Attachment 2
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Subclass	MODS bcs	MODS ocr	MODS fsm	MODS lsm	MODS 1SackS_m	MODS mecparc	MODS spbs Oth	MODS spbsPrio
1st L&P	470,011	105,924	383,769	52,994	18,018	563	36,878	6,501
1PreL	227,480	23,758	34,530	8,908	4,989	220	4,399	918
1Cds	12,826	4,502	610	4,464	612	3	80	26
1PreC	4,277	659	77	381	114	1	0	0
Priority	482	126	15,077	222	4,311	4,343	14,477	36,091
Express	9	6	83	2	541	22	132	389
Mailgrams	0	0	0	0	1	0	0	0
2IC	0	0	445	0	53	1	14	1
2Reg	600	23	63,735	6	4,463	499	17,277	2,196
2NP	569	173	10,263	1	636	77	3,509	418
2CL	0	0	769	0	78	2	77	2
3SP	4,425	595	7,686	65	578	144	2,452	139
3BRCRT	19,571	3,837	15,944	3	1,602	101	15,156	706
3BRO	134,430	15,552	260,487	4,138	9,585	886	63,358	2,454
3NPCRT	5,049	564	2,643	0	297	90	1,117	129
3NPO	41,732	5,192	34,087	1,916	2,022	18	9,313	204
4ZPP	7	10	969	2	1,249	587	2,505	587
4BPM	11	5	3,766	1	414	205	3,602	100
4SPC	26	0	2,846	1	175	112	2,507	92
4LIB	0	0	359	0	18	0	385	0
USPS	1,974	570	5,470	624	376	619	1,595	851
Free	98	0	510	0	76	2	1,156	177
Intl	9,227	2,974	7,352	1,410	1,896	156	1,590	861
Registry	2	51	137	1	117	5	0	7
Certified	0	0	0	0	1	0	0	0
Insurance	0	0	0	0	1	0	0	0
COD	0	0	0	0	1	0	0	0
Money Ord	0	0	0	0	0	0	0	0
Stamp Env	0	0	0	0	0	0	0	0
Sp Hndlng	1	0	0	0	7	0	0	0
PO Box	0	0	0	0	0	0	0	0
Other Special Svs	1,429	0	0	1	30	0	0	0
Total	934,238	164,522	851,615	75,142	52,261	8,656	181,579	52,849

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

Attachment 2
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Subclass	MODS manf	MODS manl	MODS manp	MODS Priority	MODS ld15	MODS 1bulk pr	MODS 1cancMPP	MODS 1OpBulk
1st L&P	132,536	694,810	5,044	6,360	325,321	4,714	135,902	102,984
1PreL	14,522	125,749	887	375	60,606	2,115	7,234	26,439
1Cds	314	56,205	3	5	10,451	149	3,497	3,703
1PreC	120	8,997	1	1	424	29	101	613
Priority	8,564	5,040	8,456	117,058	459	577	5,275	13,967
Express	87	928	157	1,875	0	74	75	2,116
Mailgrams	0	127	0	0	0	0	0	5
2IC	1,121	150	1	3	0	6	3	432
2Reg	56,927	9,025	1,335	533	0	529	638	18,786
2NP	8,421	1,948	182	110	0	72	149	2,881
2CL	406	2	0	2	0	4	2	84
3SP	3,075	5,339	270	278	857	133	666	2,201
3BRCRT	6,410	11,601	970	767	3,704	517	312	13,156
3BRO	94,565	140,815	4,491	1,509	27,877	1,844	3,767	75,057
3NPCRT	1,480	3,509	44	7	2,444	38	124	2,117
3NPO	17,543	56,848	101	202	10,533	478	901	14,905
4ZPP	410	586	5,474	669	0	72	366	2,620
4BPM	1,652	611	1,830	179	0	44	127	2,267
4SPC	1,193	1	1,438	115	0	30	357	1,013
4LIB	290	0	0	0	0	56	136	148
USPS	1,908	10,053	457	3,047	1,135	79	1,099	1,951
Free	63	797	127	5	0	13	56	512
Intl	3,399	14,334	358	2,488	15,727	239	1,615	5,006
Registry	64	0	1	4	0	24	26	303
Certified	0	0	0	0	0	1	0	7
Insurance	0	0	0	0	0	0	0	3
COD	0	0	0	0	0	0	0	3
Money Ord	0	0	0	0	0	0	0	0
Stamp Env	0	0	0	0	0	0	0	0
Sp Hndlng	0	0	0	0	0	0	1	71
PO Box	0	0	0	0	0	0	0	0
Other Special Svs	0	2,038	1	2	0	10	52	159
Total	355,068	1,149,513	31,630	135,596	459,539	11,845	162,480	293,506

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	MODS 1OpPref	MODS 1Platform	MODS 1Pouching	MODS 1SackS_h	MODS 1scan	MODS 1EEqmt	MODS 1Support	MODS BusReply
1st L&P	293,714	371,448	186,719	59,716	18,116	16,164	22,098	8,335
1PreL	68,840	88,924	44,828	15,206	4,854	3,982	4,978	1,057
1Cds	8,698	12,622	5,578	2,019	586	638	831	292
1PreC	1,777	2,645	1,149	380	113	113	142	1
Priority	52,559	92,420	33,855	16,317	6,965	2,335	2,842	1,067
Express	5,425	11,272	4,361	2,029	1,659	500	438	6
Mailgrams	10	17	6	3	1	1	1	0
2IC	754	858	333	360	28	43	31	1
2Reg	51,078	55,717	24,931	14,518	1,872	2,396	2,097	54
2NP	6,944	9,334	3,641	2,262	289	785	340	13
2CL	311	458	180	142	12	15	16	1
3SP	5,195	8,852	3,542	1,298	254	395	317	455
3BRCRT	17,812	27,686	10,212	6,510	964	1,344	1,030	33
3BRO	107,434	153,137	70,181	28,276	6,130	6,290	7,846	316
3NPCRT	2,492	3,898	1,379	888	138	218	190	92
3NPO	23,456	33,103	14,927	6,018	1,410	1,406	1,823	32
4ZPP	6,327	18,007	3,878	3,319	384	354	334	552
4BPM	4,097	7,118	2,152	1,453	177	226	194	23
4SPC	2,146	4,351	1,388	653	166	3,723	148	506
4LIB	431	630	294	133	16	15	19	0
USPS	6,119	9,300	3,446	1,400	406	435	437	2,472
Free	1,197	1,351	799	736	42	46	50	5
Intl	14,932	25,474	11,214	3,803	1,110	1,316	1,325	87
Registry	835	3,087	528	169	59	84	191	2
Certified	15	151	10	4	2	4	1	0
Insurance	7	95	4	2	1	1	1	0
COD	6	90	4	2	1	1	1	0
Money Ord	0	0	0	0	0	0	0	0
Stamp Env	0	0	0	0	0	0	0	0
Sp Hndlng	47	70	44	19	8	6	2	0
PO Box	0	0	0	0	0	0	0	0
Other Special Svs	368	1,001	235	97	32	70	128	14,363
Total	683,028	943,116	429,817	167,731	45,794	42,906	47,848	29,765

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	MODS Express	MODS Mailgram	MODS Misc	MODS Registry	MODS Rewrap	MODS Intl	MODS LD41	MODS LD42
1st L&P	3,007	0	35,925	4,335	6,562	3,927	14,216	532
1PreL	73	0	8,093	439	745	1,524	10,766	104
1Cds	89	0	1,351	375	543	522	287	33
1PreC	74	0	230	3	0	146	88	0
Priority	703	0	4,620	418	1,362	2,062	172	28
Express	33,628	0	712	1,174	4	1,977	11	2
Mailgrams	0	0	2	0	0	0	0	0
2IC	2	0	50	3	0	5	0	0
2Reg	162	0	3,409	102	114	255	22	41
2NP	39	0	553	18	5	33	239	16
2CL	1	0	26	1	0	1	0	0
3SP	30	0	515	539	104	21	9	1
3BRCRT	108	0	1,674	13	9	100	1,359	32
3BRO	936	329	12,756	68	1,241	1,015	4,240	236
3NPCRT	7	0	309	1	2	227	309	10
3NPO	151	0	2,964	59	118	358	568	4
4ZPP	24	0	543	595	513	1,850	16	0
4BPM	10	0	316	5	4	163	11	0
4SPC	9	0	241	80	222	10	2	0
4LIB	0	0	30	0	0	0	0	0
USPS	2,620	0	710	7,039	145	482	82	26
Free	4	0	81	2	0	33	1	0
Intl	4,367	0	2,154	7,885	448	68,212	73	2
Registry	24	0	310	23,538	1	818	2	0
Certified	0	0	2	0	0	0	0	0
Insurance	0	0	1	0	0	0	0	0
COD	0	0	1	0	0	0	0	0
Money Ord	0	0	0	0	0	0	0	0
Stamp Env	0	0	0	0	0	0	0	0
Sp Hnding	0	0	3	0	0	0	0	0
PO Box	0	0	0	0	0	0	0	0
Other Special Svs	91	0	208	0	1	0	1	0
Total	46,159	329	77,789	46,691	12,145	83,742	32,476	1,069

Estimated Volume-Variable Cost by Subclass and Cost Pool
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Subclass	MODS LD43	MODS LD44	MODS LD48_Adm	MODS LD48_Exp	MODS LD48_Oth	MODS LD48_SpSv	MODS LD49	MODS LD79
1st L&P	190,701	69,878	36,764	447	40,266	20,267	98,344	6,413
1PreL	51,905	22,630	10,009	0	10,962	2,559	61,470	6,047
1Cds	6,150	984	1,703	0	1,865	890	6,372	698
1PreC	1,270	164	246	0	269	2	2,057	0
Priority	49,185	5,982	5,030	104	5,509	2,117	2,622	460
Express	3,239	854	1,262	807	1,382	5,309	12	29
Mailgrams	0	0	0	0	0	0	0	0
2IC	1,304	91	138	0	151	258	505	161
2Reg	30,222	4,951	3,764	0	4,123	596	22,491	588
2NP	4,627	692	850	0	930	24	7,702	475
2CL	176	102	23	0	26	2	87	0
3SP	3,055	820	739	0	809	596	6,733	23
3BRCRT	29,024	1,722	2,404	0	2,633	1,247	1,511	2,090
3BRO	99,902	15,400	9,485	0	10,389	2,632	17,255	12,619
3NPCRT	2,556	140	219	0	240	11	191	793
3NPO	16,325	2,726	1,757	0	1,924	571	4,219	8,497
4ZPP	13,162	781	1,105	0	1,210	442	296	430
4BPM	7,141	581	693	0	759	720	1,626	176
4SPC	4,308	186	369	0	405	9	599	10
4LIB	1,233	124	90	0	98	1	0	0
USPS	4,167	1,077	1,792	221	1,963	1,899	13,917	2,734
Free	710	1	46	0	50	2	1	0
Intl	4,066	736	980	0	1,073	3,695	1,077	28
Registry	90	9	324	0	355	2,120	26	19
Certified	0	0	1,783	0	1,953	11,279	1	0
Insurance	0	0	466	0	511	243	0	0
COD	0	0	50	0	55	127	0	0
Money Ord	0	0	1,744	0	1,911	0	0	0
Stamp Env	0	0	58	0	64	0	0	0
Sp Hndlng	0	2	6	0	6	0	0	0
PO Box	0	0	1,368	0	1,499	0	0	0
Other Special Svs	386	0	855	0	936	1,791	9,202	79
Total	524,905	130,634	86,120	1,578	94,324	59,408	258,319	42,369

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	Subtotal MODS	Non-MODS MANL	Non-MODS MANF	Non-MODS MANP	Non-MODS AUTO/MEC	Non-MODS REGISTRY	Non-MODS EXPRESS
1st L&P	3,990,224	434,609	154,843	14,204	75,713	2,338	0
1PreL	963,123	118,697	15,073	1,094	38,607	891	0
1Cds	150,576	23,169	0	5	2,108	1	0
1PreC	26,665	7,572	0	3	1,537	1	0
Priority	523,258	2,362	23,160	51,796	272	315	0
Express	82,584	142	686	143	9	270	6,434
Mailgrams	173	0	0	0	0	0	0
2IC	7,305	831	3,205	32	3	0	0
2Reg	400,072	6,476	75,276	1,760	724	231	0
2NP	69,219	381	11,020	108	170	1	0
2CL	3,010	4	1,064	1	3	0	0
3SP	63,204	2,219	4,749	1,739	825	2	0
3BRCRT	203,872	14,839	21,765	259	4,813	175	86
3BRO	1,408,926	103,806	174,800	22,344	23,056	184	0
3NPCRT	33,964	1,916	2,645	6	785	1	0
3NPO	318,412	35,448	19,359	1,224	4,987	111	0
4ZPP	70,236	915	611	20,659	185	58	0
4BPM	42,457	74	3,293	8,749	37	6	0
4SPC	29,439	9	1,124	5,465	5	3	0
4LIB	4,507	2	209	1,102	1	0	0
USPS	94,697	4,434	2,004	3,719	295	782	255
Free	8,747	477	34	942	150	1	0
Intl	222,691	4,066	1,130	904	338	840	0
Registry	33,336	0	0	0	8	2,792	0
Certified	15,216	4	0	0	2	0	0
Insurance	1,335	0	0	0	0	0	0
COD	341	0	0	0	0	0	0
Money Ord	3,655	0	0	0	0	0	0
Stamp Env	122	0	0	0	0	0	0
Sp Hndlng	294	0	0	0	0	0	0
PO Box	2,867	0	0	0	0	0	0
Other Special Svs	33,568	0	0	0	2	0	0
Total	8,808,098	762,451	516,050	136,259	154,637	9,006	6,775

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	Non-MODS ALLIED	Non-MODS MISC	ubtotal Non-MODS	BMC SSM	BMC OTHR	BMC PSM	BMC SPB
1st L&P	219,296	78,007	979,011	86	1,090	477	565
1PreL	59,165	24,176	257,703	0	241	50	0
1Cds	5,012	2,591	32,887	0	179	0	0
1PreC	1,372	1,129	11,614	0	0	0	0
Priority	33,028	7,456	118,389	103	1,429	978	364
Express	5,100	1,404	14,189	0	0	0	0
Mailgrams	0	0	0	0	0	0	0
2IC	1,098	209	5,378	12	63	0	20
2Reg	35,199	7,766	127,433	3,385	11,008	67	2,979
2NP	6,660	953	19,293	909	2,550	139	153
2CL	377	60	1,510	317	250	0	82
3SP	3,820	2,640	15,993	542	4,722	1,871	2,238
3BRCRT	32,611	4,195	78,744	2,184	6,567	437	1,594
3BRO	103,418	24,964	452,572	12,582	95,284	33,053	34,690
3NPCRT	3,027	407	8,787	363	1,599	557	358
3NPO	17,210	4,048	82,387	2,233	13,209	1,842	4,360
4ZPP	14,659	2,497	39,584	5,163	49,181	15,348	5,821
4BPM	5,980	1,198	19,338	2,217	21,771	16,526	2,412
4SPC	2,467	555	9,627	1,461	15,447	13,331	1,296
4LIB	663	78	2,054	0	1,482	1,497	83
USPS	5,123	3,001	19,613	101	7,337	662	1,894
Free	1,335	122	3,062	257	755	548	252
Intl	2,127	845	10,251	2,298	13,844	5,313	5,018
Registry	1	1,126	3,928	0	118	0	0
Certified	2	16,836	16,845	0	0	0	0
Insurance	0	538	538	0	0	0	0
COD	0	322	322	0	0	0	0
Money Ord	0	0	0	0	0	0	0
Stamp Env	0	0	0	0	0	0	0
Sp Hndlng	0	0	0	0	0	0	0
PO Box	0	0	0	0	0	0	0
Other Special Svs	1	7,710	7,713	0	439	0	0
Total	558,750	194,834	2,338,763	34,213	248,565	92,698	64,180

Estimated Volume-Variable Cost by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Response to MPA/USPS-T16-17
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Subclass	BMC NMO	BMC Platform	Subtotal BMC	Grand Total
1st L&P	183	704	3,105	4,972,340
1PreL	0	161	452	1,221,279
1Cds	1	60	239	183,703
1PreC	0	0	0	38,278
Priority	643	1,392	4,911	646,558
Express	0	0	0	96,773
Mailgrams	0	0	0	173
2IC	0	58	153	12,836
2Reg	36	7,932	25,408	552,912
2NP	361	2,335	6,447	94,960
2CL	1	220	870	5,391
3SP	850	3,516	13,738	92,936
3BRCRT	347	5,189	16,318	298,934
3BRO	7,340	69,602	252,551	2,114,049
3NPCRT	4	1,376	4,256	47,007
3NPO	574	8,766	30,985	431,783
4ZPP	13,980	45,306	134,800	244,620
4BPM	3,069	19,488	65,484	127,279
4SPC	1,879	13,705	47,118	86,185
4LIB	884	1,348	5,294	11,855
USPS	1,891	4,321	16,206	130,516
Free	12	550	2,373	14,182
Intl	1,767	10,432	38,673	271,614
Registry	0	89	208	37,472
Certified	0	0	0	32,062
Insurance	0	0	0	1,874
COD	0	0	0	663
Money Ord	0	0	0	3,655
Stamp Env	0	0	0	122
Sp Hndlng	0	0	0	294
PO Box	0	0	0	2,867
Other Special Svs	1	168	608	41,890
Total	33,824	196,718	670,198	11,817,059

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

Attachment 3
Response to MPA/USPS-T16-17
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Subclass	MODS bcs	MODS ocr	MODS fsm	MODS lsm	MODS 1SackS_m	MODS mecparc	MODS spbs Oth	MODS spbsPrio
1st L&P	50.3%	64.4%	45.1%	70.5%	34.5%	6.5%	20.3%	12.3%
1PreL	24.3%	14.4%	4.1%	11.9%	9.5%	2.5%	2.4%	1.7%
1Cds	1.4%	2.7%	0.1%	5.9%	1.2%	0.0%	0.0%	0.0%
1PreC	0.5%	0.4%	0.0%	0.5%	0.2%	0.0%	0.0%	0.0%
Priority	0.1%	0.1%	1.8%	0.3%	8.2%	50.2%	8.0%	68.3%
Express	0.0%	0.0%	0.0%	0.0%	1.0%	0.3%	0.1%	0.7%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
2Reg	0.1%	0.0%	7.5%	0.0%	8.5%	5.8%	9.5%	4.2%
2NP	0.1%	0.1%	1.2%	0.0%	1.2%	0.9%	1.9%	0.8%
2CL	0.0%	0.0%	0.1%	0.0%	0.2%	0.0%	0.0%	0.0%
3SP	0.5%	0.4%	0.9%	0.1%	1.1%	1.7%	1.4%	0.3%
3BRCRT	2.1%	2.3%	1.9%	0.0%	3.1%	1.2%	8.3%	1.3%
3BRO	14.4%	9.5%	30.6%	5.5%	18.3%	10.2%	34.9%	4.6%
3NPCRT	0.5%	0.3%	0.3%	0.0%	0.6%	1.0%	0.6%	0.2%
3NPO	4.5%	3.2%	4.0%	2.6%	3.9%	0.2%	5.1%	0.4%
4ZPP	0.0%	0.0%	0.1%	0.0%	2.4%	6.8%	1.4%	1.1%
4BPM	0.0%	0.0%	0.4%	0.0%	0.8%	2.4%	2.0%	0.2%
4SPC	0.0%	0.0%	0.3%	0.0%	0.3%	1.3%	1.4%	0.2%
4LIB	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%
USPS	0.2%	0.3%	0.6%	0.8%	0.7%	7.2%	0.9%	1.6%
Free	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.6%	0.3%
Intl	1.0%	1.8%	0.9%	1.9%	3.6%	1.8%	0.9%	1.6%
Registry	0.0%	0.0%	0.0%	0.0%	0.2%	0.1%	0.0%	0.0%
Certified	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Response to MPA/USPS-T16-17
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Subclass	MODS manf	MODS manl	MODS manp	MODS Priority	MODS ld15	MODS 1bulk pr	MODS 1cancMPP	MODS 1OpBulk
1st L&P	37.3%	60.4%	15.9%	4.7%	70.8%	39.8%	83.6%	35.1%
1PreL	4.1%	10.9%	2.8%	0.3%	13.2%	17.9%	4.5%	9.0%
1Cds	0.1%	4.9%	0.0%	0.0%	2.3%	1.3%	2.2%	1.3%
1PreC	0.0%	0.8%	0.0%	0.0%	0.1%	0.2%	0.1%	0.2%
Priority	2.4%	0.4%	26.7%	86.3%	0.1%	4.9%	3.2%	4.8%
Express	0.0%	0.1%	0.5%	1.4%	0.0%	0.6%	0.0%	0.7%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
2Reg	16.0%	0.8%	4.2%	0.4%	0.0%	4.5%	0.4%	6.4%
2NP	2.4%	0.2%	0.6%	0.1%	0.0%	0.6%	0.1%	1.0%
2CL	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3SP	0.9%	0.5%	0.9%	0.2%	0.2%	1.1%	0.4%	0.7%
3BRCRT	1.8%	1.0%	3.1%	0.6%	0.8%	4.4%	0.2%	4.5%
3BRO	26.6%	12.2%	14.2%	1.1%	6.1%	15.6%	2.3%	25.6%
3NPCRT	0.4%	0.3%	0.1%	0.0%	0.5%	0.3%	0.1%	0.7%
3NPO	4.9%	4.9%	0.3%	0.1%	2.3%	4.0%	0.6%	5.1%
4ZPP	0.1%	0.1%	17.3%	0.5%	0.0%	0.6%	0.2%	0.9%
4BPM	0.5%	0.1%	5.8%	0.1%	0.0%	0.4%	0.1%	0.8%
4SPC	0.3%	0.0%	4.5%	0.1%	0.0%	0.3%	0.2%	0.3%
4LIB	0.1%	0.0%	0.0%	0.0%	0.0%	0.5%	0.1%	0.1%
USPS	0.5%	0.9%	1.4%	2.2%	0.2%	0.7%	0.7%	0.7%
Free	0.0%	0.1%	0.4%	0.0%	0.0%	0.1%	0.0%	0.2%
Intl	1.0%	1.2%	1.1%	1.8%	3.4%	2.0%	1.0%	1.7%
Registry	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	0.1%
Certified	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%	0.0%	0.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	MODS 1OpPref	MODS 1Platform	MODS 1Pouching	MODS 1SackS_h	MODS 1scan	MODS 1EEqmt	MODS 1Support	MODS BusReply
1st L&P	43.0%	39.4%	43.4%	35.6%	39.6%	37.7%	46.2%	28.0%
1PreL	10.1%	9.4%	10.4%	9.1%	10.6%	9.3%	10.4%	3.5%
1Cds	1.3%	1.3%	1.3%	1.2%	1.3%	1.5%	1.7%	1.0%
1PreC	0.3%	0.3%	0.3%	0.2%	0.2%	0.3%	0.3%	0.0%
Priority	7.7%	9.8%	7.9%	9.7%	15.2%	5.4%	5.9%	3.6%
Express	0.8%	1.2%	1.0%	1.2%	3.6%	1.2%	0.9%	0.0%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.1%	0.1%	0.1%	0.2%	0.1%	0.1%	0.1%	0.0%
2Reg	7.5%	5.9%	5.8%	8.7%	4.1%	5.6%	4.4%	0.2%
2NP	1.0%	1.0%	0.8%	1.3%	0.6%	1.8%	0.7%	0.0%
2CL	0.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
3SP	0.8%	0.9%	0.8%	0.8%	0.6%	0.9%	0.7%	1.5%
3BRCRT	2.6%	2.9%	2.4%	3.9%	2.1%	3.1%	2.2%	0.1%
3BRO	15.7%	16.2%	16.3%	16.9%	13.4%	14.7%	16.4%	1.1%
3NPCRT	0.4%	0.4%	0.3%	0.5%	0.3%	0.5%	0.4%	0.3%
3NPO	3.4%	3.5%	3.5%	3.6%	3.1%	3.3%	3.8%	0.1%
4ZPP	0.9%	1.9%	0.9%	2.0%	0.8%	0.8%	0.7%	1.9%
4BPM	0.6%	0.8%	0.5%	0.9%	0.4%	0.5%	0.4%	0.1%
4SPC	0.3%	0.5%	0.3%	0.4%	0.4%	8.7%	0.3%	1.7%
4LIB	0.1%	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%
USPS	0.9%	1.0%	0.8%	0.8%	0.9%	1.0%	0.9%	8.3%
Free	0.2%	0.1%	0.2%	0.4%	0.1%	0.1%	0.1%	0.0%
Intl	2.2%	2.7%	2.6%	2.3%	2.4%	3.1%	2.8%	0.3%
Registry	0.1%	0.3%	0.1%	0.1%	0.1%	0.2%	0.4%	0.0%
Certified	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	0.1%	0.1%	0.1%	0.1%	0.1%	0.2%	0.3%	48.3%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	MODS Express	MODS Mailgram	MODS Misc	MODS Registry	MODS Rewrap	MODS Intl	MODS LD41	MODS LD42
1st L&P	6.5%	0.0%	46.2%	9.3%	54.0%	4.7%	43.8%	49.8%
1PreL	0.2%	0.0%	10.4%	0.9%	6.1%	1.8%	33.2%	9.7%
1Cds	0.2%	0.0%	1.7%	0.8%	4.5%	0.6%	0.9%	3.1%
1PreC	0.2%	0.0%	0.3%	0.0%	0.0%	0.2%	0.3%	0.0%
Priority	1.5%	0.0%	5.9%	0.9%	11.2%	2.5%	0.5%	2.6%
Express	72.9%	0.0%	0.9%	2.5%	0.0%	2.4%	0.0%	0.1%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
2Reg	0.4%	0.0%	4.4%	0.2%	0.9%	0.3%	0.1%	3.8%
2NP	0.1%	0.0%	0.7%	0.0%	0.0%	0.0%	0.7%	1.5%
2CL	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3SP	0.1%	0.0%	0.7%	1.2%	0.9%	0.0%	0.0%	0.1%
3BRCRT	0.2%	0.0%	2.2%	0.0%	0.1%	0.1%	4.2%	3.0%
3BRO	2.0%	100.0%	16.4%	0.1%	10.2%	1.2%	13.1%	22.1%
3NPCRT	0.0%	0.0%	0.4%	0.0%	0.0%	0.3%	1.0%	1.0%
3NPO	0.3%	0.0%	3.8%	0.1%	1.0%	0.4%	1.7%	0.4%
4ZPP	0.1%	0.0%	0.7%	1.3%	4.2%	2.2%	0.1%	0.0%
4BPM	0.0%	0.0%	0.4%	0.0%	0.0%	0.2%	0.0%	0.0%
4SPC	0.0%	0.0%	0.3%	0.2%	1.8%	0.0%	0.0%	0.0%
4LIB	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
USPS	5.7%	0.0%	0.9%	15.1%	1.2%	0.6%	0.3%	2.4%
Free	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
Intl	9.5%	0.0%	2.8%	16.9%	3.7%	81.5%	0.2%	0.2%
Registry	0.1%	0.0%	0.4%	50.4%	0.0%	1.0%	0.0%	0.0%
Certified	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	0.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

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Subclass	MODS LD43	MODS LD44	MODS LD48_Adm	MODS LD48_Exp	MODS LD48_Oth	MODS LD48_SpSv	MODS LD49	MODS LD79
1st L&P	36.3%	53.5%	42.7%	28.3%	42.7%	34.1%	38.1%	15.1%
1PreL	9.9%	17.3%	11.6%	0.0%	11.6%	4.3%	23.8%	14.3%
1Cds	1.2%	0.8%	2.0%	0.0%	2.0%	1.5%	2.5%	1.6%
1PreC	0.2%	0.1%	0.3%	0.0%	0.3%	0.0%	0.8%	0.0%
Priority	9.4%	4.6%	5.8%	6.6%	5.8%	3.6%	1.0%	1.1%
Express	0.6%	0.7%	1.5%	51.1%	1.5%	8.9%	0.0%	0.1%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.2%	0.1%	0.2%	0.0%	0.2%	0.4%	0.2%	0.4%
2Reg	5.8%	3.8%	4.4%	0.0%	4.4%	1.0%	8.7%	1.4%
2NP	0.9%	0.5%	1.0%	0.0%	1.0%	0.0%	3.0%	1.1%
2CL	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
3SP	0.6%	0.6%	0.9%	0.0%	0.9%	1.0%	2.6%	0.1%
3BRCRT	5.5%	1.3%	2.8%	0.0%	2.8%	2.1%	0.6%	4.9%
3BRO	19.0%	11.8%	11.0%	0.0%	11.0%	4.4%	6.7%	29.8%
3NPCRT	0.5%	0.1%	0.3%	0.0%	0.3%	0.0%	0.1%	1.9%
3NPO	3.1%	2.1%	2.0%	0.0%	2.0%	1.0%	1.6%	20.1%
4ZPP	2.5%	0.6%	1.3%	0.0%	1.3%	0.7%	0.1%	1.0%
4BPM	1.4%	0.4%	0.8%	0.0%	0.8%	1.2%	0.6%	0.4%
4SPC	0.8%	0.1%	0.4%	0.0%	0.4%	0.0%	0.2%	0.0%
4LIB	0.2%	0.1%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
USPS	0.8%	0.8%	2.1%	14.0%	2.1%	3.2%	5.4%	6.5%
Free	0.1%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
Intl	0.8%	0.6%	1.1%	0.0%	1.1%	6.2%	0.4%	0.1%
Registry	0.0%	0.0%	0.4%	0.0%	0.4%	3.6%	0.0%	0.0%
Certified	0.0%	0.0%	2.1%	0.0%	2.1%	19.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.5%	0.0%	0.5%	0.4%	0.0%	0.0%
COD	0.0%	0.0%	0.1%	0.0%	0.1%	0.2%	0.0%	0.0%
Money Ord	0.0%	0.0%	2.0%	0.0%	2.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	1.6%	0.0%	1.6%	0.0%	0.0%	0.0%
Other Special Svs	0.1%	0.0%	1.0%	0.0%	1.0%	3.0%	3.6%	0.2%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

Subclass	Non-MODS MANL	Non-MODS MANF	Non-MODS MANP	Non-MODS AUTO/MEC	Non-MODS REGISTRY	Non-MODS EXPRESS	Non-MODS ALLIED
1st L&P	57.0%	30.0%	10.4%	49.0%	26.0%	0.0%	39.2%
1PreL	15.6%	2.9%	0.8%	25.0%	9.9%	0.0%	10.6%
1Cds	3.0%	0.0%	0.0%	1.4%	0.0%	0.0%	0.9%
1PreC	1.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.2%
Priority	0.3%	4.5%	38.0%	0.2%	3.5%	0.0%	5.9%
Express	0.0%	0.1%	0.1%	0.0%	3.0%	95.0%	0.9%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.1%	0.6%	0.0%	0.0%	0.0%	0.0%	0.2%
2Reg	0.8%	14.6%	1.3%	0.5%	2.6%	0.0%	6.3%
2NP	0.1%	2.1%	0.1%	0.1%	0.0%	0.0%	1.2%
2CL	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%
3SP	0.3%	0.9%	1.3%	0.5%	0.0%	0.0%	0.7%
3BRCRT	1.9%	4.2%	0.2%	3.1%	1.9%	1.3%	5.8%
3BRO	13.6%	33.9%	16.4%	14.9%	2.0%	0.0%	18.5%
3NPCRT	0.3%	0.5%	0.0%	0.5%	0.0%	0.0%	0.5%
3NPO	4.6%	3.8%	0.9%	3.2%	1.2%	0.0%	3.1%
4ZPP	0.1%	0.1%	15.2%	0.1%	0.6%	0.0%	2.6%
4BPM	0.0%	0.6%	6.4%	0.0%	0.1%	0.0%	1.1%
4SPC	0.0%	0.2%	4.0%	0.0%	0.0%	0.0%	0.4%
4LIB	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.1%
USPS	0.6%	0.4%	2.7%	0.2%	8.7%	3.8%	0.9%
Free	0.1%	0.0%	0.7%	0.1%	0.0%	0.0%	0.2%
Intl	0.5%	0.2%	0.7%	0.2%	9.3%	0.0%	0.4%
Registry	0.0%	0.0%	0.0%	0.0%	31.0%	0.0%	0.0%
Certified	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Estimated Distribution Key Shares by Subclass and Cost Pool
Uses Broadened Mixed-Mail Distribution Method from Response to MPA/USPS-T16-17(b)

Attachment 3
Response to MPA/USPS-T16-17
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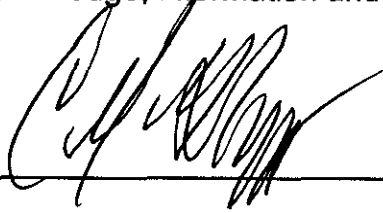| Subclass	Non-MODS MISC	BMC SSM	BMC OTHR	BMC PSM	BMC SPB	BMC NMO	BMC Platform
1st L&P	40.0%	0.3%	0.4%	0.5%	0.9%	0.5%	0.4%
1PreL	12.4%	0.0%	0.1%	0.1%	0.0%	0.0%	0.1%
1Cds	1.3%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%
1PreC	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Priority	3.8%	0.3%	0.6%	1.1%	0.6%	1.9%	0.7%
Express	0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Mailgrams	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2IC	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
2Reg	4.0%	9.9%	4.4%	0.1%	4.6%	0.1%	4.0%
2NP	0.5%	2.7%	1.0%	0.2%	0.2%	1.1%	1.2%
2CL	0.0%	0.9%	0.1%	0.0%	0.1%	0.0%	0.1%
3SP	1.4%	1.6%	1.9%	2.0%	3.5%	2.5%	1.8%
3BRCRT	2.2%	6.4%	2.6%	0.5%	2.5%	1.0%	2.6%
3BRO	12.8%	36.8%	38.3%	35.7%	54.1%	21.7%	35.4%
3NPCRT	0.2%	1.1%	0.6%	0.6%	0.6%	0.0%	0.7%
3NPO	2.1%	6.5%	5.3%	2.0%	6.8%	1.7%	4.5%
4ZPP	1.3%	15.1%	19.8%	16.6%	9.1%	41.3%	23.0%
4BPM	0.6%	6.5%	8.8%	17.8%	3.8%	9.1%	9.9%
4SPC	0.3%	4.3%	6.2%	14.4%	2.0%	5.6%	7.0%
4LIB	0.0%	0.0%	0.6%	1.6%	0.1%	2.6%	0.7%
USPS	1.5%	0.3%	3.0%	0.7%	3.0%	5.6%	2.2%
Free	0.1%	0.8%	0.3%	0.6%	0.4%	0.0%	0.3%
Intl	0.4%	6.7%	5.6%	5.7%	7.8%	5.2%	5.3%
Registry	0.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Certified	8.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Insurance	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
COD	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Money Ord	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Stamp Env	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sp Hndlng	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
PO Box	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other Special Svs	4.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

DECLARATION

I, Carl G. Degen, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Date: 4-28-00

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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April 28, 2000