

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

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POSTAL RATE COMMISSION  
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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

REVISED RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 16 -- ERRATA  
(August 3, 2000)

The United States Postal Service hereby provides revised attachments (except pages 3 and 6) to the response of witness Mayes to Presiding Officer's Information Request No. 16, dated July 14, 2000. The response was originally filed on July 27, 2000. The revisions are necessary to correct errors regarding the test year revenue estimates for Priority Mail and Parcel Post. Pages 3 and 6 of the original attachment are unchanged. The revisions are explained on the attached sheet. The library reference supporting these changes (LR-I-445) will be filed tomorrow.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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August 3, 2000

## **Summary of August 3, 2000 Revisions to Response to POIR 16 and Library References USPS-LR-I-435 and USPS-LR-I-436**

### **Changes to Hybrid Billing Determinants**

A computational error was made in the development of the Hybrid FY 1999 Q3 – FY 2000 Q2 Billing Determinants for Parcel Post, originally presented in Library Reference USPS-LR-I-435. The revenue leakage associated with the barcode discount for Destination Entry (Parcel Select) Parcel Post, shown in cell X287 should have been \$4,384,098 rather than \$32,783,274. This change causes the total revenue for Parcel Select pieces in cells X288 and AC27 to change from \$566,492,027 to \$594,891,269. Total calculated Parcel Post revenue before Revenue Adjustment Factors, in cell AC28, changes from \$957,868,415 to \$986,267,657. The revenue adjustment factor for Parcel Select, in cell AC42, changes from 109.29854513% to 104.08079186, and the revenue adjustment factor for total Parcel Post, in cell AC43, changes from 105.30508731% to 102.27286304%.

Due to a programming error, the PERMIT data for Priority Mail volumes were omitted from the files for PQ 1 and 2 of FY 2000 originally used to develop the Hybrid Billing Determinants. The corrected data were used to develop revised Hybrid Q3 FY 1999 – Q2 FY 2000 Billing Determinants. These revised Billing Determinants will be provided in Library Reference USPS-LR-I-445. The distribution of flat rate pieces to zones was also added to the revised Billing Determinants for Priority Mail.

### **Changes to Revenue Calculations Based on Hybrid Billing Determinants**

The error in the barcode discount for Parcel Select Parcel Post causes changes to cells AU287 and AU288 in the revenue calculation spreadsheets originally filed as Library Reference USPS-LR-I-436. As noted above, the calculated revenues shown in cells BW27 and BW28, and the revenue adjustment factors in cells BW52 and BW53 have changed as a result.

The Test Year Before Rates and Test Year After Rates volumes, originally shown in cells K286 and K287, distributed over the Parcel Select Hybrid Billing Determinants to calculated test year Parcel Select revenues inadvertently omitted the test year DDU and DSCF volumes. The use of the correct volumes, provided in cells I288-K292, causes changes to the distributions of Test Year Before Rates and Test Year After Rates volumes and revenues for Parcel Select, and to Parcel Post in total. The revised revenue estimates are reflected in the corrected response to POIR 16.

The revised Billing Determinants for Priority Mail were used to develop test year revenue estimates. The Test Year Before Rates total revenue for Priority Mail did not change. The Test Year After Rates Priority Mail total revenue increased slightly. This revised estimate is developed in Library Reference LR-I-445 and is reflected in the revised response to POIR 16.

Summary of Estimated Test Year Before Rates Finances  
Revenue and Volume Variable Cost  
(Dollars in Thousands)

Description	Volume Variable Cost (1)	Revenue (2)	Revenue as Percent of Cost (Col. 2/Col. 1) (3)	Revenue Minus Vol. Var. Cost (Col. 2 - Col. 1) (4)
First-Class Mail				
Single-Piece Letters and Sealed Parcels	13,586,081	22,236,977	163.7%	8,650,896
Presort and Automation Letters	5,115,088	12,788,270	250.0%	7,673,182
Total Letters	18,701,169	35,025,247	187.3%	16,324,078
Single-Piece Cards	556,627	592,337	106.4%	35,710
Presort and Automation Cards	177,569	436,990	246.1%	259,421
Total Cards	734,196	1,029,327	140.2%	295,131
Total First-Class Mail	19,435,365	36,054,574	185.5%	16,619,209
Priority Mail	3,390,168	5,345,639	157.7%	1,955,471
Express Mail	462,139	1,005,884	217.7%	543,745
Mailgrams	850	1,136	133.6%	286
Periodicals				
Within County	87,046	76,728	88.1%	(10,318)
Outside County				
Nonprofit	364,374	313,809	86.1%	(50,565)
Classroom	14,538	13,199	90.8%	(1,339)
Regular-Rate	1,992,410	1,784,849	89.6%	(207,561)
Total Periodicals	2,458,368	2,188,585	89.0%	(269,783)
Standard Mail (A)				
Regular	6,784,313	8,706,739	128.3%	1,922,426
Enhanced Carrier Route	2,685,551	5,043,421	187.8%	2,357,870
Total Commercial	9,469,864	13,750,160	145.2%	4,280,296
Nonprofit	1,363,813	1,457,426	106.9%	93,613
Enhanced Carrier Route	202,982	230,257	113.4%	27,275
Total Nonprofit	1,566,795	1,687,683	107.7%	120,888
Total Standard Mail (A)	11,036,659	15,437,843	139.9%	4,401,184
Standard Mail (B)				
Parcel Post	1,097,363	1,193,030	108.7%	95,667
Bound Printed Matter	512,221	486,862	95.0%	(25,359)
Special Rate	361,266	321,866	89.1%	(39,400)
Library Rate	54,852	48,513	88.4%	(6,339)
Total Standard Mail (B)	2,025,702	2,050,270	101.2%	24,568
Free-for-the-Blind	31,724	0	0.0%	(31,724)
Total Domestic Mail	38,840,975	62,093,931	159.8%	23,242,956
International Mail	1,619,092	1,772,350	109.5%	153,258
Total All Mail	40,460,067	63,856,281	157.8%	23,396,214
Special Services				
Registry	104,550	82,455	78.9%	(22,095)
Certified Mail	492,029	414,039	84.1%	(77,990)
Insurance	80,900	87,563	108.2%	6,663
COD	16,708	18,379	110.0%	1,671
Money Orders *	170,767	291,038	170.4%	120,271
Stamped Cards	3,046	4,458	146.4%	1,412
Stamped Envelopes	11,061	12,515	113.1%	1,454
Box/Caller Service	593,497	746,951	125.9%	153,454
Other	122,876	395,396	322.1%	272,520
Total Special Services	1,595,434	2,052,794	128.7%	457,360
Total Mail & Services	42,055,501	65,909,075	156.7%	23,853,574
Other Costs	28,010,934			
Other Income		687,847		
Prior Years Loss Recovery	311,709			
Continuing Appropriations		67,093		
Investment Income *		(21,959)		
Grand Total	70,378,144	66,642,056	94.7%	(3,736,088)

\* Money order revenues include interest of 49,159

Source: Costs from USPS-ST-44; Revenues from LR-I-436 and LR-I-445.

Summary of Revenues  
 Test Year Before Rates (2001)  
 (thousands)

Mail Service	Mail Volume	Postage	Fees	Postage & Fees (Col 2 + Col 3)	Revenue Per Piece (Col 4/Col 1)
	(1)	(2)	(3)	(4)	(5)
<b>First-Class Mail</b>					
Letters - Single	53,213,828	22,085,503	151,474	22,236,977	0.417880
Automated and Carrier Route Letters	44,117,377	11,746,075	0	11,746,075	0.266246
Non-Automated Presort Letters	2,930,521	1,018,996	0	1,018,996	0.347718
Total Worksharing	47,047,898	12,765,071	23,199	12,788,270	0.271814
Total Letters	100,261,726	34,850,574	174,673	35,025,247	0.349338
Stamped Cards	445,823	89,424	204	89,628	0.201041
Post Cards - Single	2,405,027	495,863	8,846	502,709	0.209024
Automated and Carrier Route Post Cards	2,333,598	363,555	0	363,555	0.155792
Non-Automated Presort Cards	400,483	72,089	0	72,089	0.180005
Total Worksharing Cards	2,734,081	435,644	1,346	436,990	0.159831
Total Cards	5,584,931	1,020,931	8,396	1,029,327	0.184304
Business Reply Fees	0	132,821	(132,821)	0	
Domestic Mail Fees	0	50,248	(50,248)	0	
Total First Class	105,846,657	36,054,574	0	36,054,574	0.340630
<b>Priority Mail</b>					
Priority Mail	1,356,715	5,344,935	703	5,345,639	3.940135
Domestic Mail Fees	0	814	(814)	0	
Total Priority	1,356,715	5,345,749	(111)	5,345,639	3.940135
<b>Express Mail</b>	71,641	1,005,884	0	1,005,884	14.040611
<b>Makgrams</b>	3,340	1,136	0	1,136	0.340000
<b>Periodicals</b>					
In-County	872,194	74,990	1,738	76,728	0.087971
Outside County					
Nonprofit	1,954,453	309,914	3,895	313,809	0.160561
Classroom	56,153	13,087	112	13,199	0.235057
Regular-Rate	7,545,945	1,769,811	15,038	1,784,849	0.236531
Domestic Mail Fees	0	20,783	(20,783)	0	
Total Periodicals	10,428,745	2,188,585	0	2,188,585	0.209861
<b>Standard Mail A</b>					
Commercial					
Regular	42,783,773	8,686,185	20,554	8,706,739	0.203506
Enhanced Carrier Route	33,630,517	5,027,265	18,156	5,043,421	0.149966
Total Commercial	76,414,291	13,713,450	38,710	13,750,160	0.179942
Nonprofit					
Nonprofit	11,510,795	1,416,753	40,673	1,457,426	0.126614
Enhanced Carrier Route	2,907,206	219,985	10,272	230,257	0.079202
Total Nonprofit	14,418,001	1,636,738	50,945	1,687,683	0.117054
Bulk Mailing Fees	0	61,179	(61,179)	0	
Domestic Mail Fees	0	27,089	(27,089)	0	
Total Standard Mail A	90,832,291	15,438,456	(613)	15,437,843	0.169960
<b>Standard Mail B</b>					
Parcel Post	378,447	1,192,875	455	1,193,330	3.152458
Bound Printed Matter	541,976	486,194	666	486,862	0.898308
Special Rate	208,687	321,545	321	321,866	1.542336
Library Rate	29,009	48,459	54	48,513	1.672349
Domestic Mail Fees	0	1,432	(1,432)	0	
Special Handling	0	55	(55)	0	
PAL Fees	0	11	(11)	0	
Total Standard Mail B	1,158,119	2,090,270	0	2,090,270	1.770346
Total USPS Penalty Mail	348,543	0	0	0	
Free-for-the-Blind	56,675	0	0	0	
Total Domestic Mail	210,102,726	62,064,655	(724)	62,063,931	0.295493
<b>International</b>					
Postage	1,066,939	1,509,417	10,140	1,519,557	1.424222
Terminal & Transit	0	252,793	0	252,793	
Fees, etc.	0	10,140	(10,140)	0	
Total	1,066,939	1,772,350	0	1,772,350	1.661155
Total All Mail	211,169,664	63,867,005	(724)	63,866,282	0.302393
<b>Special Services</b>					
Registry	11,563	82,455	0	82,455	7.130642
Certified Mail	295,742	414,039	0	414,039	1.400002
Insurance	45,810	87,563	0	87,563	1.919824
COO	3,576	18,379	0	18,379	5.139554
Money Orders *	234,993	291,038	0	291,038	1.238498
Stamped Cards	445,823	4,456	0	4,456	0.009999
Stamped Envelopes	400,000	12,515	0	12,515	0.031288
Box/Carrier Service	18,246	748,951	0	748,951	40.937006
Subtotal	1,455,553	1,657,398	0	1,657,398	1.138672
Other	N/A	395,396	0	395,396	N/A
Total	1,455,553	2,052,794	0	2,052,794	1.410318
Total Mail & Services	211,169,664	65,909,799	(724)	65,909,075	0.312114
Other Income	0	687,847		687,847	
Revenue Forgone	0	67,093		67,093	
Investment Income *	0	(21,959)		(21,959)	
Total, all items	211,169,664	66,842,780	(724)	66,842,056	0.315585

\* Money order revenues include 49,159 in interest.

Source: Express Mail volume from USPS-T-8; Priority Mail volume from USPS-T-34; all other volumes from USPS-T-6. Revenues from LR-436 and LR-445.

Summary of Estimated Test Year After Rates Finances  
Revenue and Volume Variable Cost  
(Dollars in Thousands)

Description	Volume Variable		Revenue as	Revenue Minus
	Cost (1)	Revenue (2)	Percent of Cost (Col. 2/Col. 1) (3)	Vol. Var. Cost (Col. 2 - Col. 1) (4)
First-Class Mail				
Single-Piece Letters and Sealed Parcels	13,565,268	22,841,864	168.4%	9,276,596
Presort and Automation Letters	5,081,834	13,250,227	260.7%	8,168,593
Total Letters	18,646,902	36,092,091	193.6%	17,445,189
Single-Piece Cards	543,567	603,623	111.0%	60,056
Presort and Automation Cards	173,866	448,789	258.1%	274,923
Total Cards	717,433	1,052,412	146.7%	334,979
Total First-Class Mail	19,364,335	37,144,502	191.8%	17,780,167
Priority Mail	3,194,542	5,661,784	177.2%	2,467,242
Express Mail	467,914	1,016,142	217.2%	548,228
Mailgrams	854	1,136	133.0%	282
Periodicals				
Within County	86,222	82,297	95.4%	(3,925)
Outside County	2,345,898	2,365,325	100.8%	19,627
Total Periodicals	2,431,920	2,447,622	100.6%	15,702
Standard Mail (A)				
Regular	6,512,735	9,126,996	140.1%	2,614,261
Enhanced Carrier Route	2,629,439	5,164,832	196.4%	2,535,393
Total Commercial	9,142,174	14,291,827	156.3%	5,149,653
Nonprofit	1,363,390	1,544,246	113.3%	180,856
Enhanced Carrier Route	199,829	262,328	131.3%	62,499
Total Nonprofit	1,563,219	1,806,574	115.6%	243,355
Total Standard Mail (A)	10,705,393	16,098,401	150.4%	5,393,008
Standard Mail (B)				
Parcel Post	1,077,003	1,210,777	112.4%	133,774
Bound Printed Matter	498,658	554,060	111.1%	55,402
Special Rate	357,987	333,099	93.0%	(24,888)
Library Rate	54,015	49,661	91.9%	(4,354)
Total Standard Mail (B)	1,987,663	2,147,597	108.0%	159,934
Free-for-the-Blind	31,833	0	0.0%	(31,833)
Total Domestic Mail	38,184,454	64,517,185	169.0%	26,332,731
International Mail	1,570,744	1,778,913	113.3%	208,169
Total All Mail	39,755,198	66,296,098	166.8%	26,540,900
Special Services				
Registry	100,215	96,301	96.1%	(3,914)
Certified Mail	460,071	577,361	125.5%	117,290
Insurance	79,549	104,522	131.4%	24,973
COD	16,629	19,981	120.2%	3,352
Money Orders *	165,714	305,035	184.1%	139,321
Stamped Cards	3,048	6,317	272.9%	5,269
Stamped Envelopes	11,077	16,041	144.8%	4,964
Box/Caller Service	586,317	805,860	137.4%	219,543
Other	123,487	414,141		290,654
Total Special Services	1,546,107	2,347,559	151.8%	801,452
Total Mail & Services	41,301,305	68,643,656	166.2%	27,342,353
Other Costs	28,031,846			
Other Income		687,847		
Prior Years Loss Recovery	311,709			
Continuing Appropriations		67,093		
Investment Income *		(20,168)		
Grand Total	69,644,860	69,378,429	99.6%	(266,431)

\* Money order revenues include interest of 47,368

Source: Costs from USPS-ST-44; Revenues from LR-I-436 and LR-I-445.

Summary of Revenues  
 Test Year After Rates (2001)  
 (thousands)

Mail Service	Mail Volume (1)	Postage (2)	Fees (3)	Postage & Fees (Col 2 + Col 3) (4)	Revenue Per Piece (Col 4/Col 1) (5)
<b>First-Class Mail</b>					
Letters - Single	52,877,658	22,874,792	167,072	22,841,864	0.431976
Automated and Carrier Route Letters	44,393,448	12,284,353	0	12,284,353	0.276715
Non-Automated Presort Letters	2,586,268	843,354	0	843,354	0.364752
Total Worksharing	46,979,736	13,227,707	22,520	13,250,227	0.282041
Total Letters	99,857,394	35,902,499	189,592	36,092,091	0.361436
Stamped Cards	415,873	87,587	195	87,782	0.211079
Post Cards - Single	2,354,910	506,400	7,441	515,841	0.219049
Automated and Carrier Route Post Cards	2,286,453	374,603	0	374,603	0.163836
Non-Automated Presort Cards	383,715	72,908	0	72,908	0.190005
Total Worksharing Cards	2,670,168	447,511	1,278	448,789	0.168075
Total Cards	5,440,951	1,043,498	8,914	1,052,412	0.193424
Business Reply Fees	0	148,580	(148,580)	0	0
Domestic Mail Fees	0	49,925	(49,925)	0	0
Total First Class	105,298,345	37,144,502	0	37,144,502	0.352755
<b>Priority Mail</b>					
Priority Mail	1,249,750	5,860,989	795	5,861,784	4.730332
Domestic Mail Fees	0	795	(795)	0	0
Total Priority	1,249,750	5,861,784	0	5,861,784	4.730332
<b>Express Mail</b>	72,301	1,016,142	0	1,016,142	14.054345
<b>Mailgrams</b>	3,340	1,136	0	1,136	0.340000
<b>Periodicals</b>					
In-County	862,061	80,488	1,809	82,297	0.095466
Outside County					
Nonprofit	2,052,208	361,507	4,307	365,814	0.178254
Classroom	55,089	14,577	116	14,692	0.266702
Regular-Rate	7,351,808	1,989,390	15,429	1,984,819	0.269977
Domestic Mail Fees	0	21,681	(21,681)	0	0
Total Periodicals	10,321,166	2,447,622	0	2,447,622	0.237146
<b>Standard Mail A</b>					
Commercial					
Regular	40,998,656	9,106,517	20,479	9,126,996	0.222617
Enhanced Carrier Route	32,826,211	5,148,434	16,398	5,164,832	0.157329
Total Commercial	73,826,867	14,254,951	36,876	14,291,827	0.193586
Nonprofit					
Nonprofit	11,425,579	1,482,358	51,888	1,544,246	0.135157
Enhanced Carrier Route	2,851,875	249,376	12,952	262,328	0.091984
Total Nonprofit	14,277,455	1,741,734	64,840	1,806,574	0.126533
Bulk Mailing Fees	0	75,359	(75,359)	0	0
Domestic Mail Fees	0	26,357	(26,357)	0	0
Total Standard Mail A	88,104,322	16,098,401	0	16,098,401	0.182720
<b>Standard Mail B</b>					
Parcel Post	374,096	210,236	541	210,777	1.236538
Bound Printed Matter	524,743	553,362	698	554,060	1.055869
Special Rate	205,789	332,762	338	333,099	1.618648
Library Rate	28,432	49,599	62	49,661	1.746667
Domestic Mail Fees	0	1,412	(1,412)	0	0
Special Handling	0	227	(227)	0	0
PAL Fees	0	0	0	0	0
Total Standard Mail B	1,133,060	2,147,567	(0)	2,147,567	1.895386
Total USPS Penalty Mail	348,543	0	0	0	0
<b>Free-for-the-Blind</b>	56,875	0	0	0	0
Total Domestic Mail	206,587,501	64,517,185	(0)	64,517,185	0.312308
<b>International</b>					
Postage	1,031,627	1,516,019	10,102	1,526,121	1.479334
Terminal & Transit	0	252,793	0	252,793	0
Fees, etc.	0	10,102	(10,102)	0	0
Total	1,031,627	1,778,913	0	1,778,913	1.724376
Total All Mail	207,619,128	66,296,098	(0)	66,296,098	0.319318
<b>Special Services</b>					
Registry	11,174	96,301	0	96,301	8.618566
Certified Mail	274,934	577,361	0	577,361	2.100002
Insurance	44,680	104,522	0	104,522	2.339365
COO	3,544	19,981	0	19,981	5.638303
Money Orders *	226,435	305,035	0	305,035	1.347118
Stamped Cards	415,873	8,317	0	8,317	0.019999
Stamped Envelopes	400,000	16,041	0	16,041	0.040104
Box/Counter Service	17,958	805,860	0	805,860	44.875272
Subtotal	1,394,597	1,933,418	0	1,933,418	1.386363
Other	N/A	414,141	0	414,141	N/A
Total	1,394,597	2,347,559	0	2,347,559	1.683325
Total Mail & Services	207,619,128	68,643,656	(0)	68,643,656	0.330823
Other Income	0	383,847	0	383,847	0
Revenue Forgone	0	67,093	0	67,093	0
Investment Income *	0	(20,168)	0	(20,168)	0
Total, all items	207,619,128	69,074,430	(0)	69,074,430	0.332698

\* Money order revenues include 47,368 in interest.

Source: Express Mail volume from USPS-T-8; Priority Mail volume from USPS-T-34; all other volumes from USPS-T-6. Revenues from LR-4436 and LR-4445.

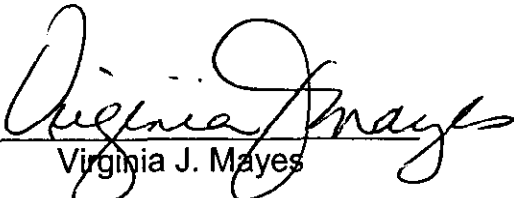
**Summary of Estimated Test Year After Rates  
Revenue and Incremental Cost  
(Dollars in Thousands)**

<u>Description</u>	<u>Incremental Cost (1)</u>	<u>Revenue (2)</u>	<u>Revenue Minus Incremental Cost (Col. 2 - Col. 1) (3)</u>
<b>First-Class Mail</b>			
Single-Piece Letters and Sealed Parcels	14,289,800	22,841,864	8,552,064
Presort and Automation Letters	5,250,742	13,250,227	7,999,485
<b>Total Letters</b>	<b>20,035,527</b>	<b>36,092,091</b>	<b>16,056,564</b>
Single-Piece Cards	557,097	603,623	46,526
Presort and Automation Cards	175,806	448,789	272,983
<b>Total Cards</b>	<b>733,759</b>	<b>1,052,412</b>	<b>318,653</b>
<b>Total First-Class Mail</b>	<b>20,993,518</b>	<b>37,144,502</b>	<b>16,150,984</b>
Priority Mail	3,562,496	5,661,784	2,099,288
Express Mail	721,848	1,016,142	294,294
Mailgrams	839	1,136	297
<b>Periodicals</b>			
Within County	86,872	82,297	(4,575)
Outside County	2,372,566	2,365,325	(7,241)
<b>Total Periodicals</b>	<b>2,462,292</b>	<b>2,447,622</b>	<b>(14,670)</b>
<b>Standard Mail (A)</b>			
Regular	6,622,948	9,126,996	2,504,048
Enhanced Carrier Route	2,770,614	5,164,832	2,394,218
<b>Total Commercial</b>	<b>9,608,383</b>	<b>14,291,827</b>	<b>4,683,444</b>
Nonprofit	1,376,714	1,544,246	167,532
Enhanced Carrier Route	200,196	262,328	62,132
<b>Total Nonprofit</b>	<b>1,578,088</b>	<b>1,806,574</b>	<b>228,486</b>
<b>Total Standard Mail (A)</b>	<b>11,313,615</b>	<b>16,098,401</b>	<b>4,784,786</b>
<b>Standard Mail (B)</b>			
Parcel Post	1,087,053	1,210,777	123,724
Bound Printed Matter	502,165	554,060	51,895
Special Rate	358,785	333,099	(25,686)
Library Rate	54,035	49,661	(4,374)
<b>Total Standard Mail (B)</b>	<b>2,020,841</b>	<b>2,147,597</b>	<b>126,756</b>
International Mail	1,631,887	1,778,913	147,026
<b>Special Services</b>			
Registry	100,302	96,301	(4,001)
Certified Mail	527,061	577,361	50,300
Insurance	79,785	104,522	24,737
COD	16,654	19,981	3,327
Money Orders	231,950	305,035	73,085
Stamped Cards	3,047	8,317	5,270
Stamped Envelopes	11,075	16,041	4,966
Box/Caller Service	587,254	805,860	218,606

Source: Revenues from USPS-LR-4-436 and USPS-LR-4-445; Costs from USPS-ST-45.

**DECLARATION**

I, Virginia J. Mayes, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Virginia J. Mayes

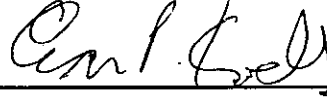
Dated:

8-3-00



**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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August 3, 2000