

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes

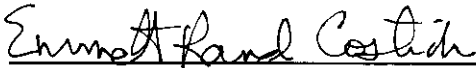
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Docket No. R2000-1

RESPONSES OF OFFICE OF THE CONSUMER ADVOCATE
WITNESS JAMES F. CALLOW TO REQUESTS OF THE
PRESIDING OFFICER AT HEARINGS ON AUGUST 4, 2000
(August 15, 2000)

The Office of the Consumer Advocate hereby provides responses of James F. Callow to the oral requests of the Presiding Officer (Tr. 36/16924-26) at hearings on August 4, 2000. Each request is stated verbatim and is followed by the response. Data used in preparing responses to each request are provided in the attachment entitled, "Attachment to OCA Response 8-15-00."

Respectfully submitted,


TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

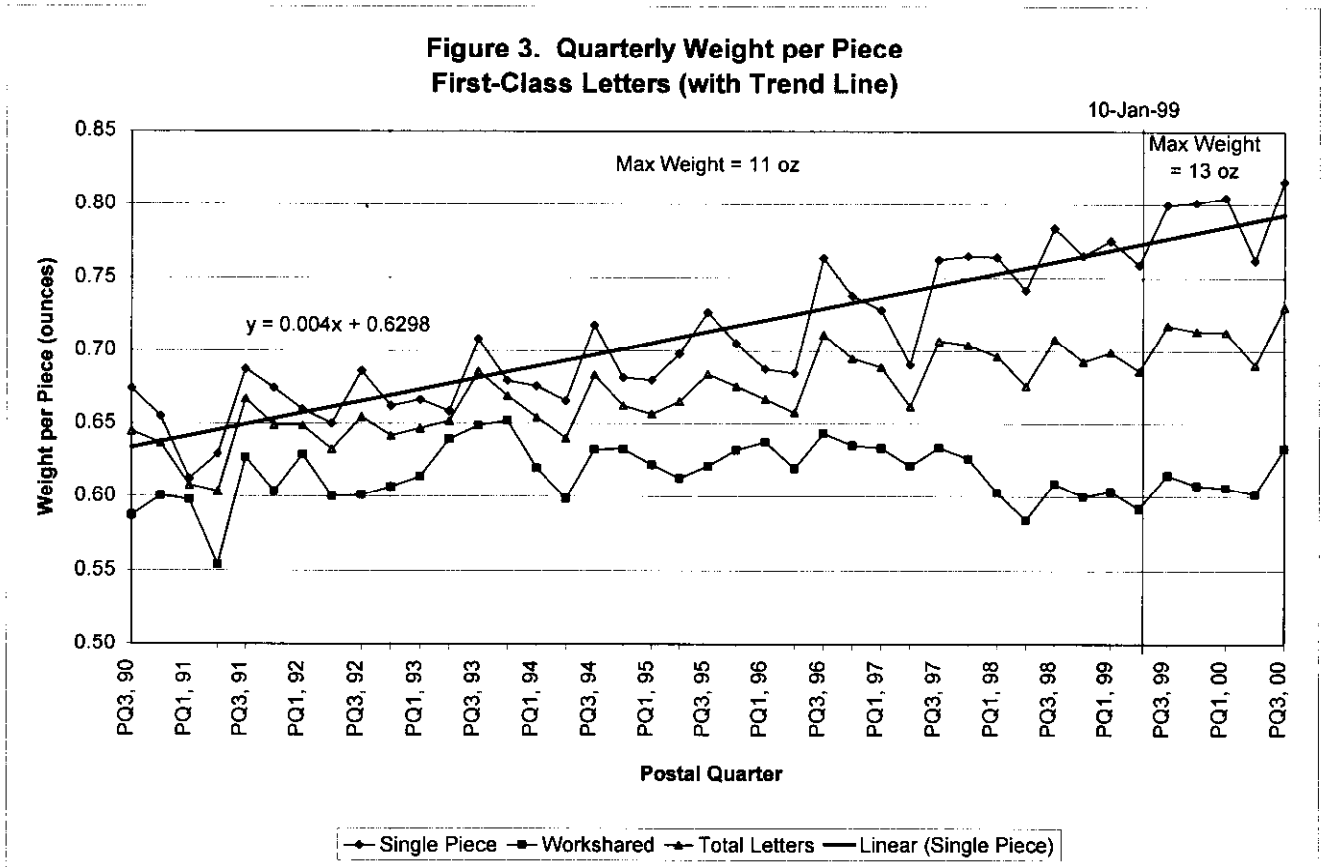
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RESPONSES OF OCA WITNESS JAMES F. CALLOW TO REQUESTS
OF THE PRESIDING OFFICER AT HEARINGS AUGUST 4, 2000

CHAIRMAN GLEIMAN: . . . could you please provide the Commission with versions of Figures 3 and 4 where the regression equations and trend lines are based on data through Postal Quarter 3 of 2000, which I believe is now available?

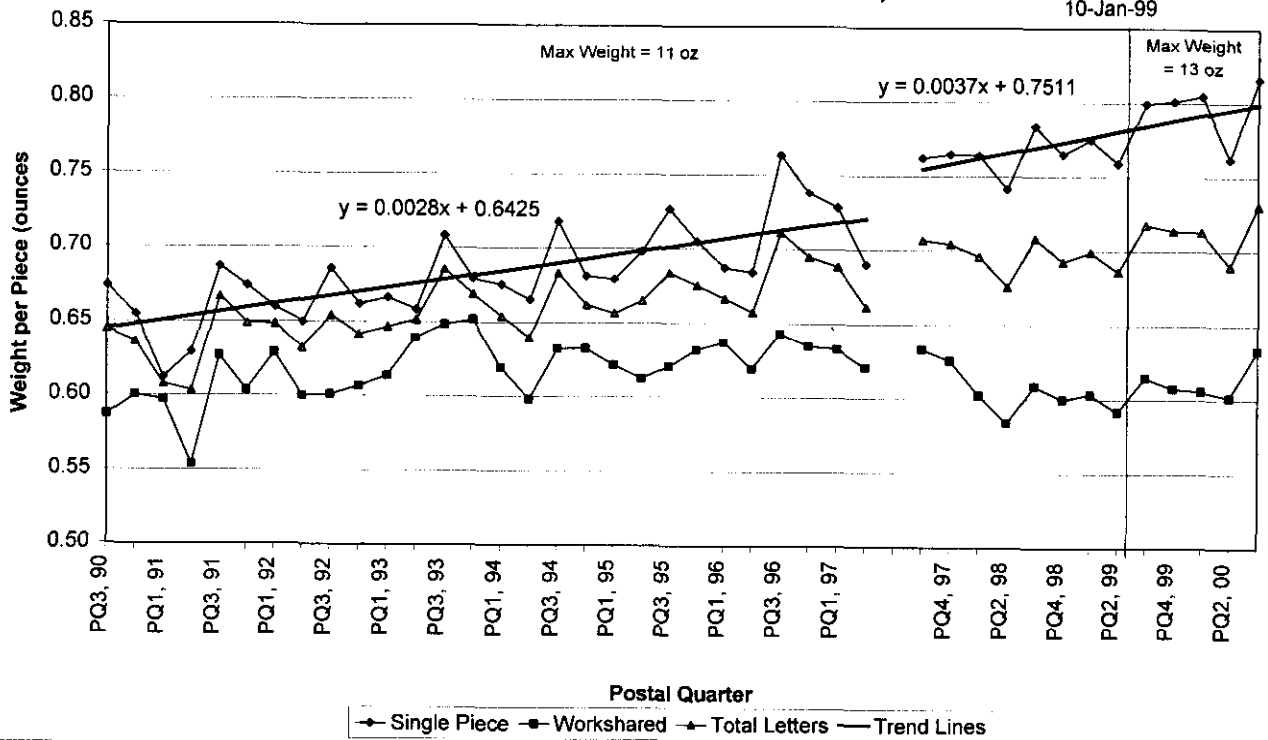
RESPONSE

Figures 3 and 4, with the regression equations and trend lines based on data through Postal Quarter 3 of 2000, are shown below.



RESPONSES OF OCA WITNESS JAMES F. CALLOW TO REQUESTS
OF THE PRESIDING OFFICER AT HEARINGS AUGUST 4, 2000

Figure 4. Quarterly Weight per Piece
First-Class Letters (with Trend Lines)



RESPONSES OF OCA WITNESS JAMES F. CALLOW TO REQUESTS
OF THE PRESIDING OFFICER AT HEARINGS AUGUST 4, 2000

CHAIRMAN GLEIMAN: If this historical trend were projected forward in each figure [e.g., Figures 1 and 2], how would its prediction of additional ounces per piece compare with the initial and revised forecasts?

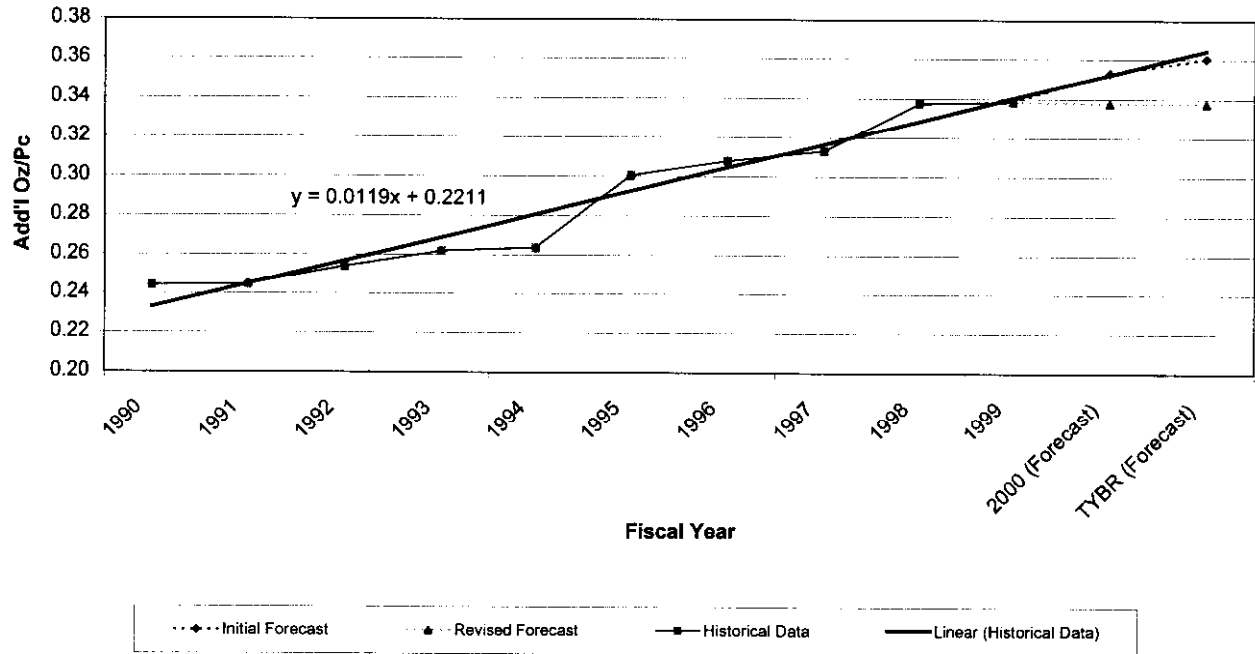
RESPONSE

Reproduced below are Figures 1 and 2 from my rebuttal testimony (OCA-RT-1), with the linear trend line through the historical data projected forward to the test year, before rates (TYBR). In Figure 1, the linear trend line tracks almost exactly the number of additional ounces per piece for single-piece First-Class Letters forecast by the Postal Service in its "as-filed" methodology. In fact, the "fit" of the linear regression line to the forecast produced by the "as-filed" methodology for Fiscal Year 2000 and the TYBR appears to be the best of any two years during the entire period shown in Figure 1. By contrast, the "revised" methodology produces a forecast far below the linear trend line.

In Figure 2, there is a similar result with respect to total First-Class Letters. The linear trend line through the historical data tracks very closely the number of additional ounces per piece in the forecast produced by the "as-filed" methodology. By contrast, the "revised" methodology produces a forecast for total First-Class Letters far below the linear trend line.

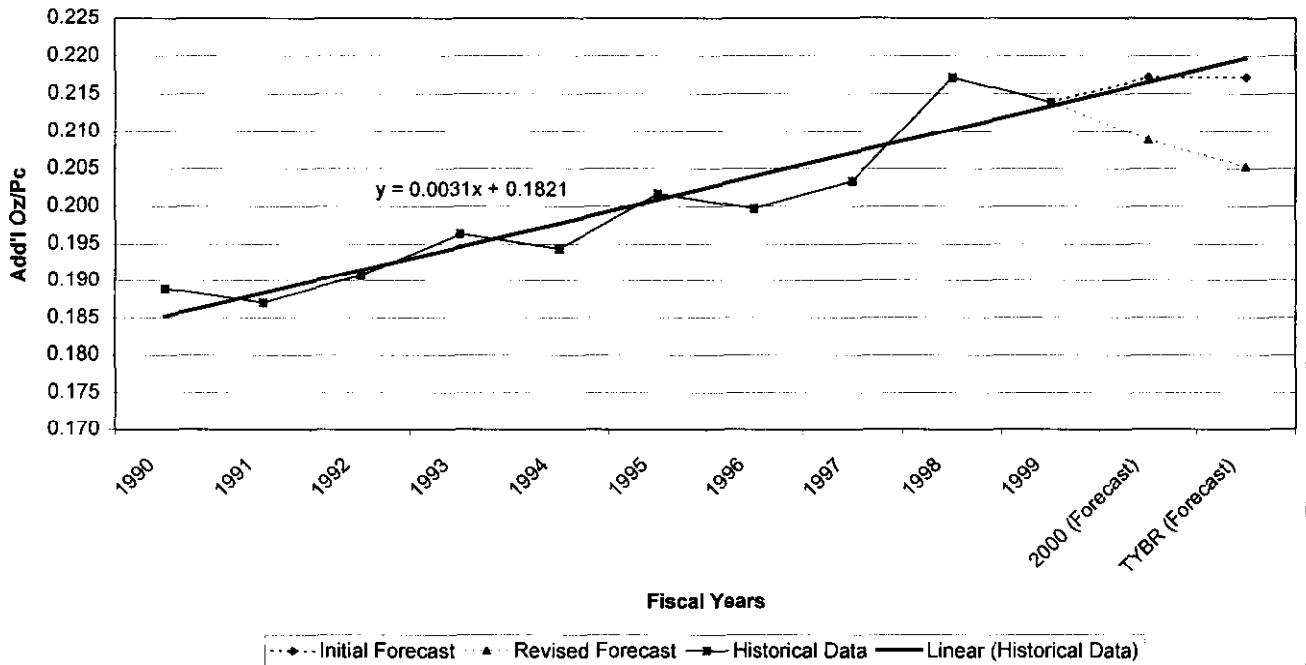
RESPONSES OF OCA WITNESS JAMES F. CALLOW TO REQUESTS
OF THE PRESIDING OFFICER AT HEARINGS AUGUST 4, 2000

**Figure 1. Additional Ounces per Piece
First-Class Single-Piece, 0-11 Ounces**



RESPONSES OF OCA WITNESS JAMES F. CALLOW TO REQUESTS
OF THE PRESIDING OFFICER AT HEARINGS AUGUST 4, 2000

Figure 2. Additional Ounces per Piece
Total First-Class Letters, 0-11 Ounces



Combined FY: PQ 3 & 4 1999 and PQ 1 & 2 2000

Oz.	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Pc.	45,743,327	3,506,764	1,372,546	751,844	485,914	328,111	246,913	184,143	148,972	114,020	91,199	70,771	53,490	53,098,014
Add'l Oz.		3,506,764	2,745,092	2,255,532	1,943,656	1,640,555	1,481,478	1,289,001	1,191,776	1,026,180	911,990	778,481	641,880	19,412,385

Add'l Oz. per Pc. 0.3656 Excluding 12&13 Oz. Pc. 0.3396

7395554
26241772

Q 1&2 FY 1997
Add'l Oz. per Pc. 0.2818

9541120
27818220

Q 3&4 FY 1997
Add'l Oz. per Pc. 0.3430

8395233
25955375

Q 1&2 FY 1998
Add'l Oz. per Pc. 0.3234

9814391
27980556

Q 3&4 FY 1998
Add'l Oz. per Pc. 0.3508

FY 1999

Oz.	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Pc.	46,357,005	3,555,528	1,404,186	760,402	498,520	332,308	248,430	184,075	146,335	115,168	89,580	52,583	39,518	53,783,618
Add'l Oz.		3,555,528	2,808,372	2,281,206	1,994,080	1,661,540	1,490,580	1,288,525	1,170,680	1,036,512	895,600	578,413	474,216	19,235,252

Add'l Oz. per Pc. 0.3576 Excluding 12&13 Oz. Pc. **0.3386**

Q 1&2 FY 1999

Oz.	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Pc.	22,486,485	1,652,838	655,414	358,853	240,559	156,481	116,003	85,457	67,398	52,643	39,529	13,763	9,999	25,935,422
Add'l Oz.		1,652,838	1,310,828	1,076,559	962,236	782,405	696,018	598,199	539,184	473,787	395,290	151,393	119,988	8,758,725

Add'l Oz. per Pc. 0.3377 Excluding 12&13 Oz. Pc. **0.3275** Including 12&13 Oz. Pc. 0.0102

Q 3&4 FY 1999

Oz.	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Pc.	23,870,520	1,902,690	748,772	401,549	257,961	175,827	132,427	98,618	78,937	62,525	50,031	38,820	29,519	27,848,196
Add'l Oz.		1,902,690	1,497,544	1,204,647	1,031,844	879,135	794,562	690,326	631,496	562,725	500,310	427,020	354,228	10,476,527

Add'l Oz. per Pc. 0.3762 Excluding 12&13 Oz. Pc. **0.3490** Including 12&13 Oz. Pc. 0.0272

Q 1&2 FY 2000

Oz.	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Pc.	21,872,807	1,604,074	623,774	350,295	227,953	152,284	114,486	85,525	70,035	51,495	41,188	31,951	23,971	25,249,818
Add'l Oz.		1,604,074	1,247,548	1,050,885	911,812	761,420	686,916	598,675	560,280	463,455	411,680	351,461	287,652	8,935,858

Add'l Oz. per Pc. 0.3539 Excluding 12&13 Oz. Pc. **0.3293** Including 12&13 Oz. Pc. 0.0246

FY 1999 Before Rate Change (-Q1&2)

Add'l Oz. per Pc. **0.3117**

FY 1999 (NonAuto)

	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Oz. Pc.	3,771,927	199,996	134,666	40,314	13,796	4,663	2,919	4,742	3,329	1,638	883	682	699	4,180,254
Add'l Oz.		199,996	269,332	120,942	55,184	23,315	17,514	33,194	26,632	14,742	8,830	7,502	8,388	785,571

Add'l Oz. per Pc. **0.1879** Excluding 12&13 Oz. Pc. **0.1842**

FY 1999 (Auto)

	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Oz. Pc.	36,267,164	927,458	135,617	32,820	14,511	10,773	6,597	6,881	6,285	5,745	4,433	2,946	1,663	37,422,893
Add'l Oz.		927,458	271,234	98,460	58,044	53,865	39,582	48,167	50,280	51,705	44,330	32,406	19,956	1,695,487

Add'l Oz. per Pc. **0.0453** Excluding 12&13 Oz. Pc. **0.0439**

FY 1999 (CR)

	1	2	3	4	5	6	7	8	9	10	11	12	13	Total
Oz. Pc.	1,204,697	42,468	8,378	429	-	-	-	-	-	-	-	-	-	1,255,972
Add'l Oz.		42,468	16,756	1,287	-	-	-	-	-	-	-	-	-	60,511

Add'l Oz. per Pc. **0.0482** Excluding 12&13 Oz. Pc. **0.0482**

Additional Ounces per Piece
Comparison of Historical with Initial and Revised Forecast Data
0-11 Ounce Letters (Forecasts Exclude Migrating Mail)

	Initial Forecast & Historical Data (Forecast in Box) Add'l Oz/Pc	Annual Percent Change	Revised Forecast & Historical Data (Forecast in Box) Add'l Oz/Pc	Annual Percent Change
Single Piece:				
1990	0.2443		0.2443	
1991	0.2448	0.2%	0.2448	0.2%
1992	0.2541	3.8%	0.2541	3.8%
1993	0.2622	3.2%	0.2622	3.2%
1994	0.2639	0.6%	0.2639	0.6%
1995	0.3007	13.9%	0.3007	13.9%
1996	0.3081	2.5%	0.3081	2.5%
1997	0.3134	1.7%	0.3134	1.7%
1998	0.3378	7.8%	0.3378	7.8%
1999	0.3386	0.2%	0.3386	0.2%
2000 (Forecast)	0.3532	4.3%	0.3378	-0.2%
TYBR (Forecast)	0.3604	2.0%	0.3378	0.0%
	<u>Add'l Oz/Pc</u>		<u>Add'l Oz/Pc</u>	
Workshared:				
1990	0.0749		0.0749	
1991	0.0741	-1.1%	0.0741	-1.1%
1992	0.0793	6.9%	0.0793	6.9%
1993	0.0851	7.4%	0.0851	7.4%
1994	0.0851	0.0%	0.0851	0.0%
1995	0.0524	-38.4%	0.0524	-38.4%
1996	0.0495	-5.5%	0.0495	-5.5%
1997	0.0545	10.0%	0.0545	10.0%
1998	0.0561	3.0%	0.0561	3.0%
1999	0.0577	2.9%	0.0577	2.9%
2000 (Forecast)	0.0561	-2.8%	0.0561	-2.8%
TYBR (Forecast)	0.0561	0.0%	0.0561	0.0%
	<u>Add'l Oz/Pc</u>		<u>Add'l Oz/Pc</u>	
Total 1st Class Letters:				
1990	0.1889		0.1889	
1991	0.1871	-1.0%	0.1871	-1.0%
1992	0.1908	2.0%	0.1908	2.0%
1993	0.1964	3.0%	0.1964	3.0%
1994	0.1944	-1.0%	0.1944	-1.0%
1995	0.2017	3.8%	0.2017	3.8%
1996	0.1997	-1.0%	0.1997	-1.0%
1997	0.2034	1.8%	0.2034	1.8%
1998	0.2172	6.8%	0.2172	6.8%
1999	0.2140	-1.5%	0.2140	-1.5%
2000 (Forecast)	0.2172	1.5%	0.2089	-2.4%
TYBR (Forecast)	0.2172	0.0%	0.2053	-1.7%

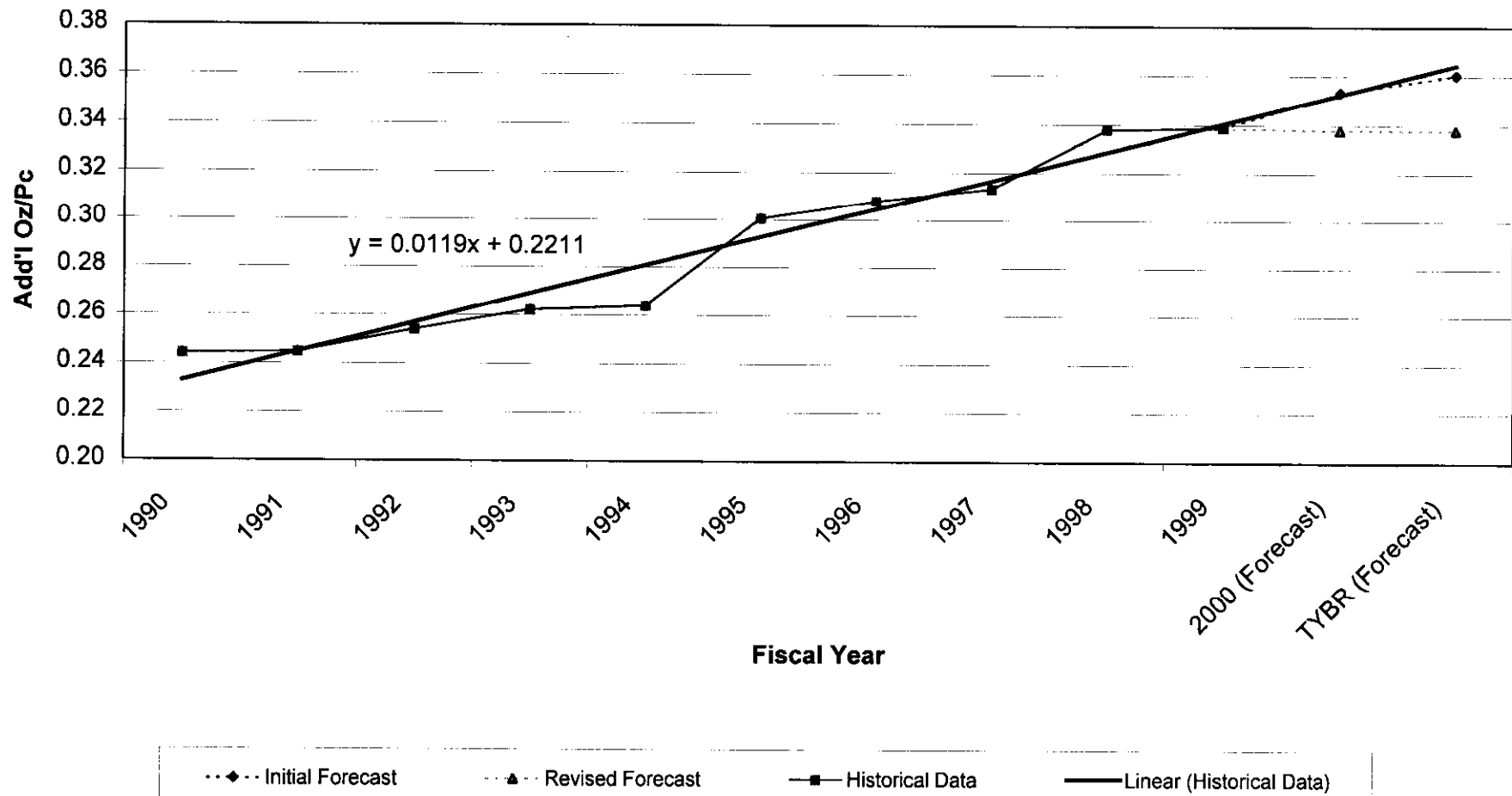
Sources: FY 1990-1998 - USPS Billing Determinants

FY 1999 - Atch. to OCA/USPS-T33-13(f), and Atch. to Response to POIR 13/Question 8

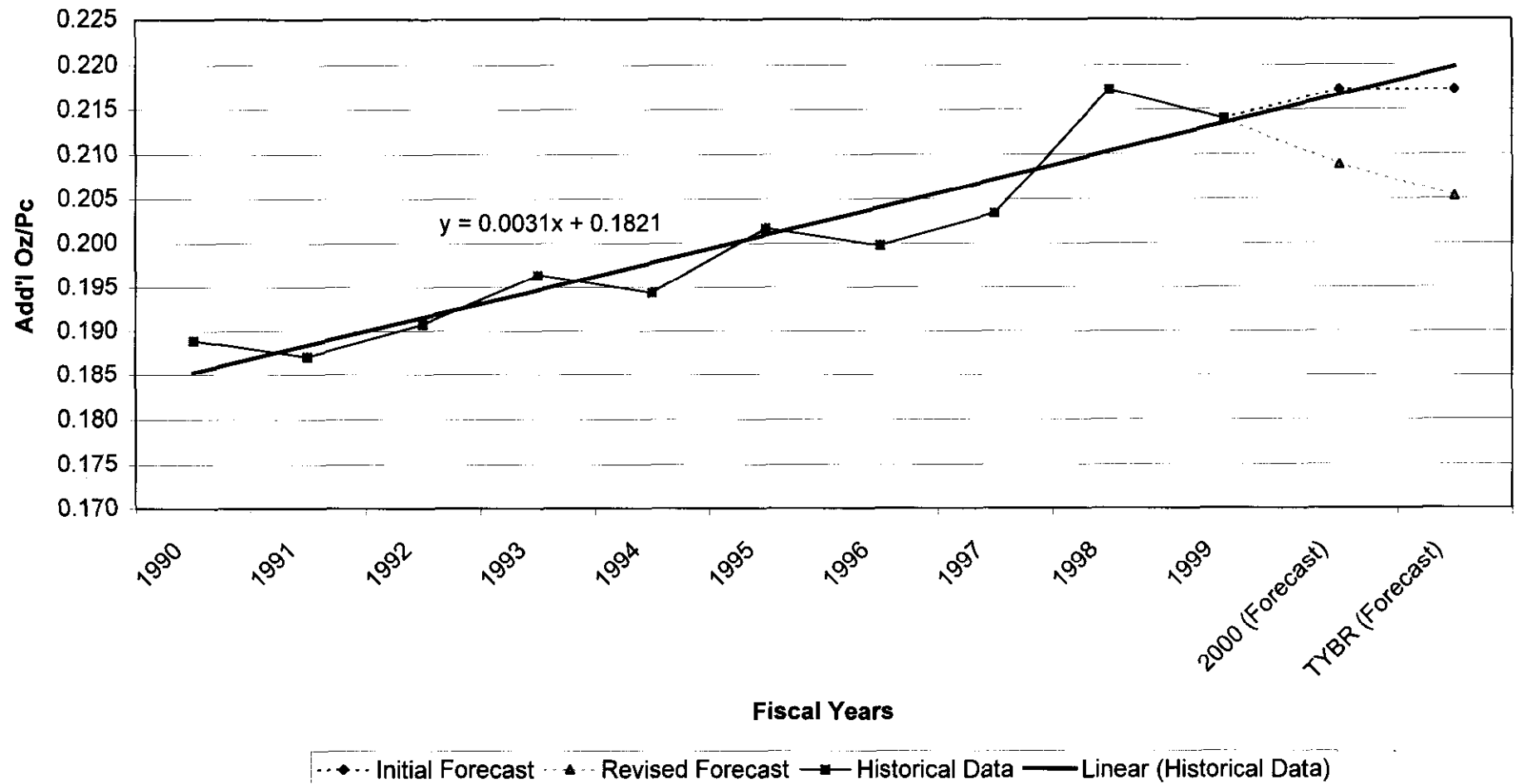
FY 2000-2001 - USPS-T-7, Workpaper 4, & LR-I-122 (Initial Forecast);

and USPS-T-33, Workpaper, Revised 4/17/00 (Revised Forecast)

**Figure 1. Additional Ounces per Piece
First-Class Single-Piece, 0-11 Ounces**



**Figure 2. Additional Ounces per Piece
Total First-Class Letters, 0-11 Ounces**



1st Cl. Single Piece

	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
PQ1, 72	13,350,696	460,385	0.55174
PQ2, 72	12,775,473	414,277	0.51884
PQ3, 72	10,848,299	373,021	0.55016
PQ4, 72	11,578,640	402,205	0.55579
PQ1, 73	14,021,155	490,305	0.55950
PQ2, 73	13,261,446	437,885	0.52831
PQ3, 73	11,509,666	400,709	0.55704
PQ4, 73	12,084,903	431,485	0.57127
PQ1, 74	14,326,452	506,959	0.56618
PQ2, 74	13,159,542	448,122	0.54485
PQ3, 74	12,106,510	421,873	0.55755
PQ4, 74	11,973,627	425,547	0.56865
PQ1, 75	14,407,126	496,633	0.55154
PQ2, 75	12,950,709	435,264	0.53775
PQ3, 75	11,849,559	406,987	0.54954
PQ4, 75	12,000,241	428,154	0.57086
PQ1, 76	14,335,914	507,771	0.56671
PQ2, 76	12,616,371	448,207	0.56841
PQ3, 76	11,834,552	417,014	0.56379
PQ4, 76	14,165,816	403,138	0.45534
PQ1, 77	12,548,028	442,252	0.56392
PQ2, 77	11,718,739	411,479	0.56181
PQ3, 77	11,059,791	402,680	0.58255
PQ4, 77	11,083,705	513,020	0.74058
PQ1, 78	12,893,112	454,210	0.56366
PQ2, 78	11,916,381	415,287	0.55760
PQ3, 78	11,787,766	434,264	0.58944
PQ4, 78	14,743,532	517,727	0.56185
PQ1, 79	12,717,449	450,346	0.56659
PQ2, 79	12,013,862	419,349	0.55849
PQ3, 79	11,332,696	422,575	0.59661
PQ4, 79	14,137,079	533,794	0.60413
PQ1, 80	12,735,254	449,152	0.56429
PQ2, 80	11,914,515	425,747	0.57174
PQ3, 80	11,514,506	441,871	0.61400
PQ4, 80	14,453,760	544,939	0.60324
PQ1, 81	12,621,783	456,429	0.57859
PQ2, 81	11,926,740	436,239	0.58522
PQ3, 81	11,164,327	440,466	0.63125
PQ4, 81	14,105,890	552,209	0.62636
PQ1, 82	12,174,152	448,054	0.58886
PQ2, 82	11,211,564	418,980	0.59793
PQ3, 82	11,130,788	426,581	0.61319
PQ4, 82	13,880,254	522,944	0.60281
PQ1, 83	11,989,463	455,635	0.60805
PQ2, 83	11,183,689	423,352	0.60567
PQ3, 83	11,104,694	432,047	0.62251

PQ4, 83	13,639,738	528,527	0.61998		
PQ1, 84	12,432,751	476,652	0.61341		
PQ2, 84	11,862,043	448,166	0.60450		
PQ3, 84	11,263,617	453,112	0.64365		
PQ4, 84	14,640,882	560,723	0.61278		
PQ1, 85	13,032,788	487,426	0.59840		
PQ2, 85	12,077,908	450,681	0.59703		
PQ3, 85	11,820,684	479,539	0.64908		
PQ4, 85	14,808,731	581,510	0.62829		
PQ1, 86	13,516,912	512,742	0.60693		
PQ2, 86	12,032,781	469,264	0.62398		
PQ3, 86	12,161,316	482,102	0.63428		
PQ4, 86	15,311,841	599,321	0.62626		
PQ1, 87	13,644,350	538,627	0.63162		
PQ2, 87	12,533,706	476,431	0.60819		
PQ3, 87	12,250,782	506,837	0.66195		
PQ4, 87	15,506,634	630,607	0.65067		
PQ1, 88	14,077,947	550,435	0.62559		
PQ2, 88	12,938,397	505,878	0.62558		
PQ3, 88	12,602,798	520,453	0.66075		
PQ4, 88	15,740,356	628,838	0.63921		
PQ1, 89	13,589,552	535,422	0.63039		
PQ2, 89	13,485,699	507,568	0.60220		
PQ3, 89	12,677,625	524,890	0.66245		
PQ4, 89	15,956,070	654,031	0.65583		
PQ1, 90	13,956,455	551,260	0.63198		
PQ2, 90	13,600,716	531,868	0.62569		
PQ3, 90	12,782,498	538,403	0.67393	0.63690	1
PQ4, 90	16,447,943	673,237	0.65490	0.64060	2
PQ1, 91	14,378,829	550,270	0.61231	0.64430	3
PQ2, 91	13,614,879	535,507	0.62932	0.64800	4
PQ3, 91	12,599,810	541,181	0.68722	0.65170	5
PQ4, 91	15,697,247	661,568	0.67433	0.65540	6
PQ1, 92	12,986,410	535,550	0.65983	0.65910	7
PQ2, 92	13,192,662	536,163	0.65026	0.66280	8
PQ3, 92	12,279,740	526,502	0.68601	0.66650	9
PQ4, 92	16,079,004	665,402	0.66213	0.67020	10
PQ1, 93	12,944,828	539,094	0.66633	0.67390	11
PQ2, 93	13,532,868	557,028	0.65858	0.67760	12
PQ3, 93	12,510,343	553,644	0.70808	0.68130	13
PQ4, 93	15,946,785	677,176	0.67944	0.68500	14
PQ1, 94	12,975,035	547,893	0.67563	0.68870	15
PQ2, 94	13,504,707	561,716	0.66551	0.69240	16
PQ3, 94	12,177,343	546,325	0.71782	0.69610	17
PQ4, 94	16,160,385	688,230	0.68140	0.69980	18
PQ1, 95	12,890,736	547,515	0.67958	0.70350	19
PQ2, 95	13,588,897	592,763	0.69794	0.70720	20
PQ3, 95	12,448,554	565,378	0.72667	0.71090	21
PQ4, 95	15,669,940	690,548	0.70509	0.71460	22

$$y = 0.0037x + 0.6332$$

PQ1, 96	12,872,400	553,071	0.68745	0.71830	23
PQ2, 96	13,301,372	568,982	0.68442	0.72200	24
PQ3, 96	12,043,511	574,557	0.76331	0.72570	25
PQ4, 96	15,672,194	722,711	0.73783	0.72940	26
PQ1, 97	12,680,931	577,043	0.72808	0.73310	27
PQ2, 97	13,560,841	585,053	0.69029	0.73680	28
PQ3, 97	12,427,527	592,174	0.76240	0.74050	29
PQ4, 97	15,390,693	735,729	0.76486	0.74420	30
PQ1, 98	12,613,478	602,399	0.76413	0.74790	31
PQ2, 98	13,341,965	618,531	0.74176	0.75160	32
PQ3, 98	12,442,942	609,649	0.78393	0.75530	33
PQ4, 98	15,537,818	743,008	0.76511	0.75900	34
PQ1, 99	12,291,918	595,649	0.77534	0.76270	35
PQ2, 99	13,272,506	629,586	0.75897		
PQ3, 99	12,536,670	626,521	0.79960		
PQ4, 99	15,311,527	766,715	0.80119		
PQ1, 00	12,059,251	606,554	0.80477		
PQ2, 00	13,190,565	628,193	0.76199		
PQ3, 00	12,058,304	614,800	0.81577		
PQ4, 00			#DIV/0!	FY 2000	

$$y = 0.0028x + 0.6425$$

	Tot Ltrs	Wkshd	Sgl Pc Ltrs	SgPc Trnd	
PQ3, 90	0.64494	0.58716	0.67393	0.6453	1
PQ4, 90	0.63660	0.60038	0.65490	0.6481	2
PQ1, 91	0.60776	0.59751	0.61231	0.6509	3
PQ2, 91	0.60345	0.55400	0.62932	0.6537	4
PQ3, 91	0.66697	0.62694	0.68722	0.6565	5
PQ4, 91	0.64908	0.60368	0.67433	0.6593	6
PQ1, 92	0.64873	0.62910	0.65983	0.6621	7
PQ2, 92	0.63264	0.60037	0.65026	0.6649	8
PQ3, 92	0.65466	0.60112	0.68601	0.6677	9
PQ4, 92	0.64187	0.60671	0.66213	0.6705	10
PQ1, 93	0.64692	0.61386	0.66633	0.6733	11
PQ2, 93	0.65176	0.63950	0.65858	0.6761	12
PQ3, 93	0.68566	0.64870	0.70808	0.6789	13
PQ4, 93	0.66903	0.65198	0.67944	0.6817	14
PQ1, 94	0.65420	0.61959	0.67563	0.6845	15
PQ2, 94	0.64007	0.59843	0.66551	0.6873	16
PQ3, 94	0.68331	0.63247	0.71782	0.6901	17
PQ4, 94	0.66224	0.63272	0.68140	0.6929	18
PQ1, 95	0.65657	0.62190	0.67958	0.6957	19
PQ2, 95	0.66512	0.61267	0.69794	0.6985	20
PQ3, 95	0.68393	0.62097	0.72667	0.7013	21
PQ4, 95	0.67555	0.63215	0.70509	0.7041	22
PQ1, 96	0.66677	0.63739	0.68745	0.7069	23
PQ2, 96	0.65766	0.61948	0.68442	0.7097	24
PQ3, 96	0.71126	0.64350	0.76331	0.7125	25
PQ4, 96	0.69491	0.63510	0.73783	0.7153	26
PQ1, 97	0.68873	0.63339	0.72808	0.7181	27
PQ2, 97	0.66177	0.62101	0.69029	0.7209	28
$y = 0.0037x + 0.7511$					
PQ3, 97	0.70682	0.63350	0.76240	0.7548	1
PQ4, 97	0.70417	0.62616	0.76486	0.7585	2
PQ1, 98	0.69612	0.60268	0.76413	0.7622	3
PQ2, 98	0.67583	0.58419	0.74176	0.7659	4
PQ3, 98	0.70824	0.60900	0.78393	0.7696	5
PQ4, 98	0.69268	0.60007	0.76511	0.7733	6
PQ1, 99	0.69912	0.60357	0.77534	0.7770	7
PQ2, 99	0.68624	0.59192	0.75897	0.7807	8
PQ3, 99	0.71760	0.61481	0.79960	0.7844	9
PQ4, 99	0.71364	0.60763	0.80119	0.7881	10
PQ1, 00	0.71289	0.60610	0.80477	0.7918	11
PQ2, 00	0.69020	0.60173	0.76199	0.7955	12
PQ3, 00	0.73031	0.63316	0.81577	0.7992	13

	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
FY 1972	48,051,923	1,630,400	0.54288
FY 1973	50,013,581	1,730,770	0.55370
FY 1974	50,609,472	1,770,702	0.55980
FY 1975	50,348,807	1,733,331	0.55082
FY 1976	50,310,597	1,791,316	0.56968
FY 1977	49,454,565	1,768,525	0.57217
FY 1978	50,826,054	1,823,365	0.57399
FY 1979	50,759,405	1,823,840	0.57490
FY 1980	51,055,654	1,875,844	0.58786
FY 1981	50,132,668	1,886,611	0.60212
FY 1982	48,585,996	1,824,023	0.60067
FY 1983	48,054,812	1,844,700	0.61420
FY 1984	50,267,248	1,941,541	0.61799
FY 1985	51,930,838	2,006,944	0.61834
FY 1986	53,188,698	2,070,267	0.62277
FY 1987	54,159,886	2,162,518	0.63885
FY 1988	55,785,362	2,222,847	0.63754
FY 1989	55,858,360	2,227,248	0.63797
FY 1990	56,787,789	2,296,696	0.64710
FY 1991	56,351,055	2,296,006	0.65191
FY 1992	54,963,091	2,281,703	0.66421
FY 1993	55,204,316	2,339,731	0.67813
FY 1994	55,057,479	2,354,593	0.68426
FY 1995	54,930,629	2,414,135	0.70318
FY 1996	54,150,759	2,437,451	0.72020
FY 1997	54,240,238	2,504,814	0.73888
FY 1998	54,273,024	2,589,862	0.76351
FY 1999	53,783,619	2,641,888	0.78593

1st Cl. Presort

	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
PQ1, 72	0	0	#DIV/0!
PQ2, 72	0	0	#DIV/0!
PQ3, 72	0	0	#DIV/0!
PQ4, 72	0	0	#DIV/0!
PQ1, 73	0	0	#DIV/0!
PQ2, 73	0	0	#DIV/0!
PQ3, 73	0	0	#DIV/0!
PQ4, 73	0	0	#DIV/0!
PQ1, 74	0	0	#DIV/0!
PQ2, 74	0	0	#DIV/0!
PQ3, 74	0	0	#DIV/0!
PQ4, 74	0	0	#DIV/0!
PQ1, 75	0	0	#DIV/0!
PQ2, 75	0	0	#DIV/0!
PQ3, 75	0	0	#DIV/0!
PQ4, 75	0	0	#DIV/0!
PQ1, 76	0	0	#DIV/0!
PQ2, 76	0	0	#DIV/0!
PQ3, 76	0	0	#DIV/0!
PQ4, 76	-3,082,111	0	0.00000
PQ1, 77	297,069	9,436	0.50822
PQ2, 77	427,854	13,770	0.51494
PQ3, 77	438,404	13,880	0.50656
PQ4, 77	3,768,414	22,199	0.09425
PQ1, 78	510,661	17,454	0.54687
PQ2, 78	633,401	21,481	0.54262
PQ3, 78	650,388	22,349	0.54980
PQ4, 78	420,109	35,123	1.33767
PQ1, 79	886,711	30,863	0.55690
PQ2, 79	1,005,529	35,443	0.56397
PQ3, 79	1,212,678	42,786	0.56452
PQ4, 79	2,365,464	63,573	0.43001
PQ1, 80	1,383,941	49,776	0.57547
PQ2, 80	1,665,221	57,960	0.55690
PQ3, 80	1,465,893	53,551	0.58450
PQ4, 80	2,317,436	83,535	0.57674
PQ1, 81	1,796,134	64,045	0.57051
PQ2, 81	1,936,005	67,133	0.55482
PQ3, 81	2,186,245	77,116	0.56437
PQ4, 81	2,895,067	106,544	0.58883
PQ1, 82	2,196,638	79,355	0.57801
PQ2, 82	2,895,498	103,832	0.57376
PQ3, 82	2,568,848	93,535	0.58258
PQ4, 82	3,410,726	122,125	0.57290
PQ1, 83	2,808,840	102,247	0.58243
PQ2, 83	3,345,248	117,244	0.56077
PQ3, 83	3,047,835	111,175	0.58363

PQ4, 83	4,089,178	148,052	0.57929
PQ1, 84	3,375,855	120,958	0.57329
PQ2, 84	3,601,559	124,934	0.55502
PQ3, 84	3,680,452	134,895	0.58643
PQ4, 84	4,624,679	171,970	0.59496
PQ1, 85	3,898,129	144,463	0.59295
PQ2, 85	4,328,671	148,613	0.54932
PQ3, 85	3,977,412	147,699	0.59415
PQ4, 85	5,267,879	194,863	0.59185
PQ1, 86	4,404,603	161,577	0.58694
PQ2, 86	4,682,495	165,093	0.56412
PQ3, 86	4,512,777	166,358	0.58982
PQ4, 86	6,060,725	223,508	0.59005
PQ1, 87	4,847,659	181,561	0.59925
PQ2, 87	5,161,506	183,977	0.57030
PQ3, 87	5,059,130	186,273	0.58911
PQ4, 87	6,301,912	236,200	0.59969
PQ1, 88	5,576,404	212,048	0.60842
PQ2, 88	5,975,033	209,221	0.56025
PQ3, 88	5,746,904	217,747	0.60623
PQ4, 88	7,170,068	275,309	0.61435
PQ1, 89	6,290,782	238,541	0.60671
PQ2, 89	5,945,451	213,469	0.57447
PQ3, 89	5,988,114	224,102	0.59879
PQ4, 89	7,569,608	288,062	0.60888
PQ1, 90	6,144,665	230,764	0.60088
PQ2, 90	6,635,907	233,212	0.56230
PQ3, 90	6,412,860	235,336	0.58716
PQ4, 90	8,311,285	311,868	0.60038
PQ1, 91	6,396,725	238,883	0.59751
PQ2, 91	7,121,582	246,583	0.55400
PQ3, 91	6,375,720	249,825	0.62694
PQ4, 91	8,732,488	329,479	0.60368
PQ1, 92	7,339,951	288,599	0.62910
PQ2, 92	7,198,311	270,102	0.60037
PQ3, 92	7,189,113	270,095	0.60112
PQ4, 92	9,262,959	351,245	0.60671
PQ1, 93	7,598,447	291,523	0.61386
PQ2, 93	7,525,969	300,803	0.63950
PQ3, 93	7,589,002	307,687	0.64870
PQ4, 93	9,738,545	396,835	0.65198
PQ1, 94	8,031,819	311,025	0.61959
PQ2, 94	8,250,000	308,564	0.59843
PQ3, 94	8,269,037	326,871	0.63247
PQ4, 94	10,485,871	414,662	0.63272
PQ1, 95	8,554,719	332,513	0.62190
PQ2, 95	8,503,299	325,605	0.61267
PQ3, 95	8,450,761	327,979	0.62097
PQ4, 95	10,667,864	421,480	0.63215

PQ1, 96	9,061,562	360,984	0.63739
PQ2, 96	9,324,288	361,015	0.61948
PQ3, 96	9,249,137	371,986	0.64350
PQ4, 96	11,244,202	446,324	0.63510
PQ1, 97	9,017,305	356,965	0.63339
PQ2, 97	9,487,944	368,256	0.62101
PQ3, 97	9,421,821	373,048	0.63350
PQ4, 97	11,972,352	468,539	0.62616
PQ1, 98	9,181,463	345,842	0.60268
PQ2, 98	9,599,299	350,488	0.58419
PQ3, 98	9,489,608	361,196	0.60900
PQ4, 98	12,150,768	455,706	0.60007
PQ1, 99	9,805,608	369,898	0.60357
PQ2, 99	10,234,309	378,619	0.59192
PQ3, 99	10,000,609	384,280	0.61481
PQ4, 99	12,644,316	480,192	0.60763
PQ1, 00	10,375,698	393,043	0.60610
PQ2, 00	10,704,577	402,578	0.60173
PQ3, 00	10,606,619	419,733	0.63316
PQ4, 00			#DIV/0! FY 2000

	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
FY 1972	0	0	0.00000
FY 1973	0	0	0.00000
FY 1974	0	0	0.00000
FY 1975	0	0	0.00000
FY 1976	0	0	0.00000
FY 1977	1,863,838	59,601	0.51164
FY 1978	2,778,640	94,947	0.54673
FY 1979	4,846,098	170,793	0.56389
FY 1980	6,838,016	246,181	0.57603
FY 1981	8,821,707	313,683	0.56893
FY 1982	11,095,670	399,767	0.57647
FY 1983	13,355,461	480,591	0.57575
FY 1984	15,310,578	553,584	0.57851
FY 1985	17,546,206	638,217	0.58198
FY 1986	19,808,418	722,529	0.58361
FY 1987	21,379,326	788,309	0.58996
FY 1988	24,792,307	926,673	0.59804
FY 1989	25,791,537	964,177	0.59814
FY 1990	27,584,597	1,014,181	0.58826
FY 1991	28,805,316	1,071,738	0.59530
FY 1992	31,231,742	1,187,773	0.60850
FY 1993	32,650,138	1,307,085	0.64053
FY 1994	35,507,306	1,356,971	0.61147
FY 1995	36,413,799	1,417,740	0.62295
FY 1996	39,057,194	1,547,384	0.63389
FY 1997	40,062,616	1,572,462	0.62800
FY 1998	40,634,252	1,521,299	0.59902
FY 1999	42,859,119	1,620,460	0.60494

1st Cl. Total Letters

	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
PQ1, 72	13,350,696	460,385	0.55174
PQ2, 72	12,775,473	414,277	0.51884
PQ3, 72	10,848,299	373,021	0.55016
PQ4, 72	11,578,640	402,205	0.55579
PQ1, 73	14,021,155	490,305	0.55950
PQ2, 73	13,261,446	437,885	0.52831
PQ3, 73	11,509,666	400,709	0.55704
PQ4, 73	12,084,903	431,485	0.57127
PQ1, 74	14,326,452	506,959	0.56618
PQ2, 74	13,159,542	448,122	0.54485
PQ3, 74	12,106,510	421,873	0.55755
PQ4, 74	11,973,627	425,547	0.56865
PQ1, 75	14,407,126	496,633	0.55154
PQ2, 75	12,950,709	435,264	0.53775
PQ3, 75	11,849,559	406,987	0.54954
PQ4, 75	12,000,241	428,154	0.57086
PQ1, 76	14,335,914	507,771	0.56671
PQ2, 76	12,616,371	448,207	0.56841
PQ3, 76	11,834,552	417,014	0.56379
PQ4, 76	11,083,705	403,138	0.58195
PQ1, 77	12,845,097	451,688	0.56263
PQ2, 77	12,146,593	425,249	0.56016
PQ3, 77	11,498,195	416,560	0.57965
PQ4, 77	14,852,119	535,219	0.57658
PQ1, 78	13,403,773	471,664	0.56302
PQ2, 78	12,549,782	436,768	0.55685
PQ3, 78	12,438,154	456,613	0.58737
PQ4, 78	15,163,641	552,850	0.58334
PQ1, 79	13,604,160	481,209	0.56596
PQ2, 79	13,019,391	454,792	0.55891
PQ3, 79	12,545,374	465,361	0.59351
PQ4, 79	16,502,543	597,367	0.57918
PQ1, 80	14,119,195	498,928	0.56539
PQ2, 80	13,579,736	483,707	0.56992
PQ3, 80	12,980,399	495,422	0.61067
PQ4, 80	16,771,196	628,474	0.59957
PQ1, 81	14,417,917	520,474	0.57759
PQ2, 81	13,862,745	503,372	0.58098
PQ3, 81	13,350,572	517,582	0.62030
PQ4, 81	17,000,957	658,753	0.61997
PQ1, 82	14,370,790	527,409	0.58720
PQ2, 82	14,107,062	522,812	0.59296
PQ3, 82	13,699,636	520,116	0.60745
PQ4, 82	17,290,980	645,069	0.59691
PQ1, 83	14,798,303	557,882	0.60318
PQ2, 83	14,528,937	540,596	0.59533
PQ3, 83	14,152,529	543,222	0.61413

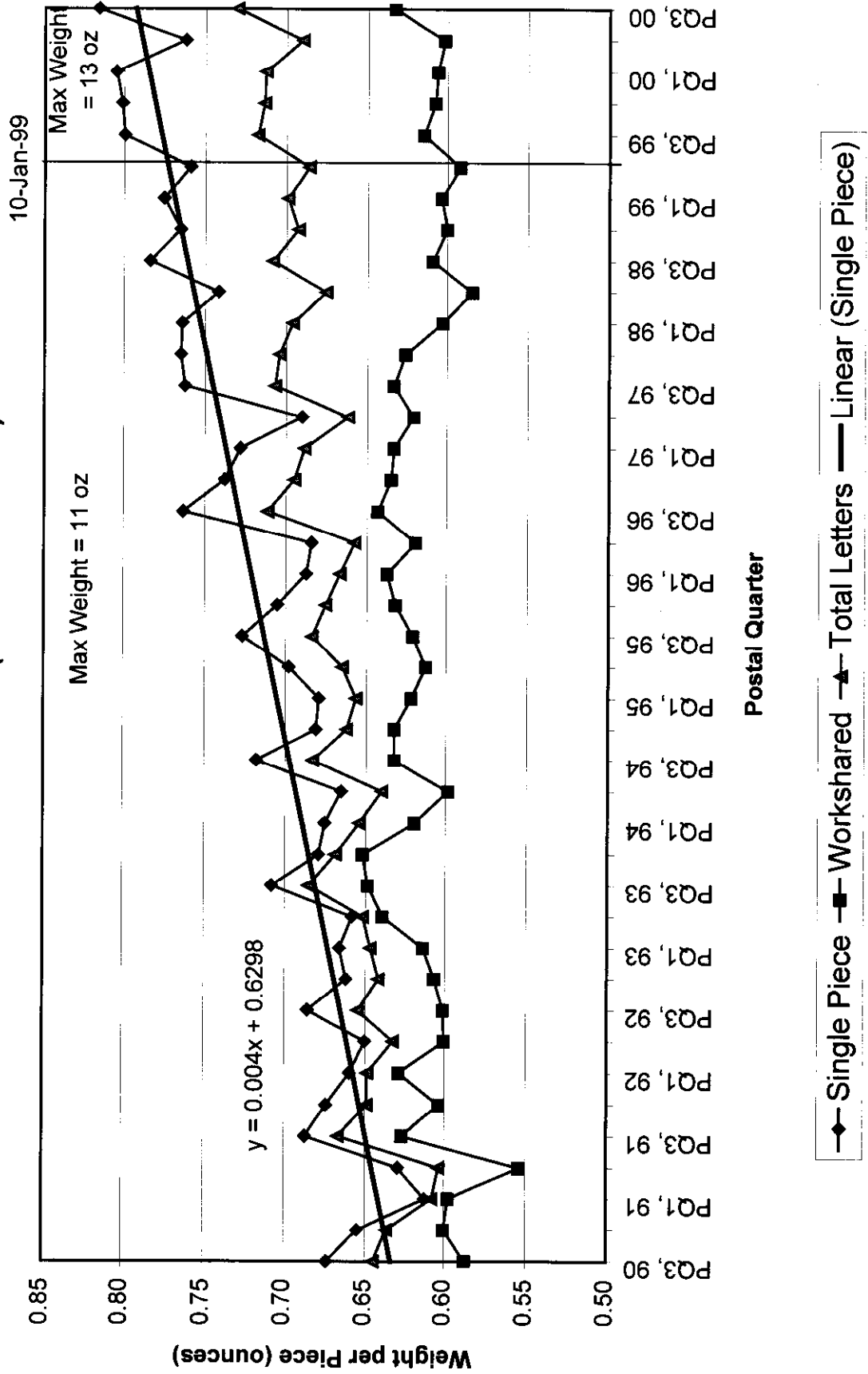
PQ4, 83	17,728,916	676,579	0.61060
PQ1, 84	15,808,606	597,610	0.60485
PQ2, 84	15,463,602	573,100	0.59298
PQ3, 84	14,944,069	588,007	0.62955
PQ4, 84	19,265,561	732,693	0.60850
PQ1, 85	16,930,917	631,889	0.59715
PQ2, 85	16,406,579	599,294	0.58444
PQ3, 85	15,798,096	627,238	0.63525
PQ4, 85	20,076,610	776,373	0.61873
PQ1, 86	17,921,515	674,319	0.60202
PQ2, 86	16,715,276	634,357	0.60721
PQ3, 86	16,674,093	648,460	0.62224
PQ4, 86	21,372,566	822,829	0.61599
PQ1, 87	18,492,009	720,188	0.62313
PQ2, 87	17,695,212	660,408	0.59714
PQ3, 87	17,309,912	693,110	0.64066
PQ4, 87	21,808,546	866,807	0.63594
PQ1, 88	19,654,351	762,483	0.62071
PQ2, 88	18,913,430	715,099	0.60494
PQ3, 88	18,349,702	738,200	0.64367
PQ4, 88	22,910,424	904,147	0.63143
PQ1, 89	19,880,334	773,963	0.62290
PQ2, 89	19,431,150	721,037	0.59372
PQ3, 89	18,665,739	748,992	0.64203
PQ4, 89	23,525,678	942,093	0.64072
PQ1, 90	20,101,120	782,024	0.62247
PQ2, 90	20,236,623	765,080	0.60491
PQ3, 90	19,195,358	773,739	0.64494
PQ4, 90	24,759,228	985,105	0.63660
PQ1, 91	20,775,554	789,153	0.60776
PQ2, 91	20,736,461	782,090	0.60345
PQ3, 91	18,975,530	791,006	0.66697
PQ4, 91	24,429,735	991,047	0.64908
PQ1, 92	20,326,361	824,149	0.64873
PQ2, 92	20,390,973	806,265	0.63264
PQ3, 92	19,468,853	796,597	0.65466
PQ4, 92	25,341,963	1,016,647	0.64187
PQ1, 93	20,543,275	830,617	0.64692
PQ2, 93	21,058,837	857,831	0.65176
PQ3, 93	20,099,345	861,331	0.68566
PQ4, 93	25,685,330	1,074,011	0.66903
PQ1, 94	21,006,854	858,918	0.65420
PQ2, 94	21,754,707	870,280	0.64007
PQ3, 94	20,446,380	873,196	0.68331
PQ4, 94	26,646,256	1,102,892	0.66224
PQ1, 95	21,445,455	880,028	0.65657
PQ2, 95	22,092,196	918,368	0.66512
PQ3, 95	20,899,315	893,357	0.68393
PQ4, 95	26,337,804	1,112,028	0.67555

PQ1, 96	21,933,962	914,055	0.66677
PQ2, 96	22,625,660	929,997	0.65766
PQ3, 96	21,292,648	946,543	0.71126
PQ4, 96	26,916,396	1,169,035	0.69491
PQ1, 97	21,698,236	934,008	0.68873
PQ2, 97	23,048,785	953,309	0.66177
PQ3, 97	21,849,348	965,222	0.70682
PQ4, 97	27,363,045	1,204,268	0.70417
PQ1, 98	21,794,941	948,241	0.69612
PQ2, 98	22,941,264	969,019	0.67583
PQ3, 98	21,932,550	970,845	0.70824
PQ4, 98	27,688,586	1,198,714	0.69268
PQ1, 99	22,097,526	965,547	0.69912
PQ2, 99	23,506,815	1,008,205	0.68624
PQ3, 99	22,537,279	1,010,801	0.71760
PQ4, 99	27,955,843	1,246,907	0.71364
PQ1, 00	22,434,949	999,597	0.71289
PQ2, 00	23,895,142	1,030,771	0.69020
PQ3, 00	22,664,923	1,034,533	0.73031
PQ4, 00			#DIV/0! FY 2000

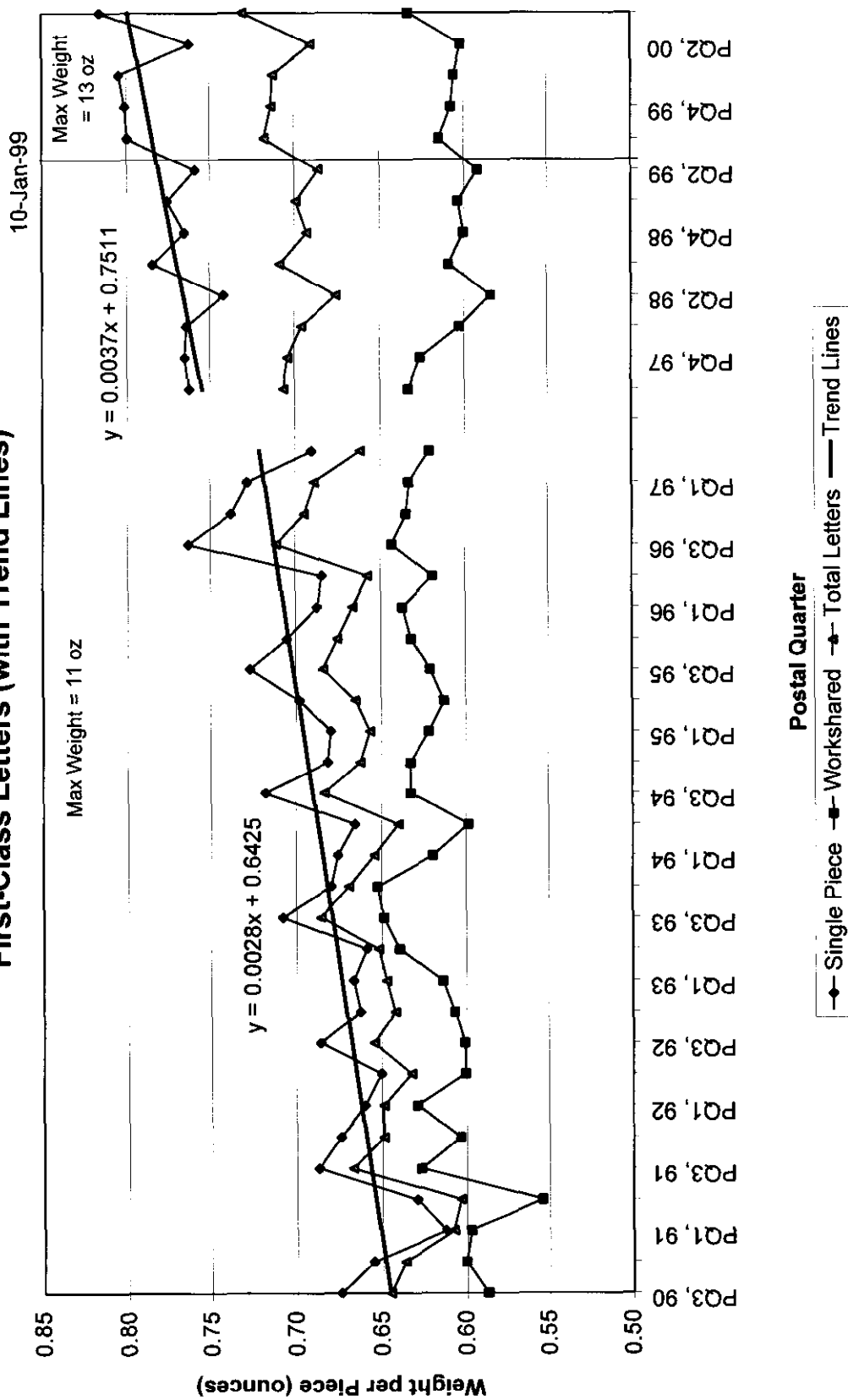
	<u>Pieces</u>	<u>Weight</u>	<u>Wgt/Pc</u>
FY 1972	48,051,923	1,630,400	0.54288
FY 1973	50,013,581	1,730,770	0.55370
FY 1974	50,609,472	1,770,702	0.55980
FY 1975	50,348,807	1,733,331	0.55082
FY 1976	50,310,597	1,791,316	0.56968
FY 1977	51,318,403	1,828,126	0.56997
FY 1978	53,604,694	1,918,312	0.57258
FY 1979	55,605,503	1,994,633	0.57394
FY 1980	57,893,670	2,122,025	0.58646
FY 1981	58,954,375	2,200,294	0.59715
FY 1982	59,681,666	2,223,790	0.59617
FY 1983	61,410,273	2,325,291	0.60584
FY 1984	65,577,826	2,495,125	0.60877
FY 1985	69,477,044	2,645,161	0.60916
FY 1986	72,997,116	2,792,796	0.61214
FY 1987	75,539,212	2,950,827	0.62502
FY 1988	80,577,669	3,149,520	0.62539
FY 1989	81,649,897	3,191,425	0.62539
FY 1990	84,372,386	3,310,877	0.62786
FY 1991	85,156,371	3,367,744	0.63276
FY 1992	86,194,833	3,469,476	0.64402
FY 1993	87,854,454	3,646,816	0.66416
FY 1994	90,564,785	3,711,564	0.65572
FY 1995	91,344,428	3,831,875	0.67120
FY 1996	93,207,953	3,984,835	0.68403
FY 1997	94,302,854	4,077,276	0.69178
FY 1998	94,907,276	4,111,161	0.69308
FY 1999	96,642,738	4,262,348	0.70567

	Single Piece	First-Class	Total Letters
	<u>Wgt/Pc</u>	<u>Wgt/Pc</u>	<u>Wgt/Pc</u>
PQ3, 90	0.67393	0.58716	0.64494
PQ4, 90	0.65490	0.60038	0.63660
PQ1, 91	0.61231	0.59751	0.60776
PQ2, 91	0.62932	0.55400	0.60345
PQ3, 91	0.68722	0.62694	0.66697
PQ4, 91	0.67433	0.60368	0.64908
PQ1, 92	0.65983	0.62910	0.64873
PQ2, 92	0.65026	0.60037	0.63264
PQ3, 92	0.68601	0.60112	0.65466
PQ4, 92	0.66213	0.60671	0.64187
PQ1, 93	0.66633	0.61386	0.64692
PQ2, 93	0.65858	0.63950	0.65176
PQ3, 93	0.70808	0.64870	0.68566
PQ4, 93	0.67944	0.65198	0.66903
PQ1, 94	0.67563	0.61959	0.65420
PQ2, 94	0.66551	0.59843	0.64007
PQ3, 94	0.71782	0.63247	0.68331
PQ4, 94	0.68140	0.63272	0.66224
PQ1, 95	0.67958	0.62190	0.65657
PQ2, 95	0.69794	0.61267	0.66512
PQ3, 95	0.72667	0.62097	0.68393
PQ4, 95	0.70509	0.63215	0.67555
PQ1, 96	0.68745	0.63739	0.66677
PQ2, 96	0.68442	0.61948	0.65766
PQ3, 96	0.76331	0.64350	0.71126
PQ4, 96	0.73783	0.63510	0.69491
PQ1, 97	0.72808	0.63339	0.68873
PQ2, 97	0.69029	0.62101	0.66177
PQ3, 97	0.76240	0.63350	0.70682
PQ4, 97	0.76486	0.62616	0.70417
PQ1, 98	0.76413	0.60268	0.69612
PQ2, 98	0.74176	0.58419	0.67583
PQ3, 98	0.78393	0.60900	0.70824
PQ4, 98	0.76511	0.60007	0.69268
PQ1, 99	0.77534	0.60357	0.69912
PQ2, 99	0.75897	0.59192	0.68624
PQ3, 99	0.79960	0.61481	0.71760
PQ4, 99	0.80119	0.60763	0.71364
PQ1, 00	0.80477	0.60610	0.71289
PQ2, 00	0.76199	0.60173	0.69020
PQ3, 00	0.81577	0.63316	0.73031

**Figure 3. Quarterly Weight per Piece
First-Class Letters (with Trend Line)**



**Figure 4. Quarterly Weight per Piece
 First-Class Letters (with Trend Lines)**



DECLARATION

I, James F. Callow, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information and belief.

Executed 8-15-00

James F Callow

CERTIFICATE OF SERVICE

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


STEPHANIE S. WALLACE

Washington, DC 20268-0001
August 15, 2000