

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

NOTICE OF THE UNITED STATES POSTAL SERVICE
OF FILING OF ADDITIONAL REVISIONS TO THE REBUTTAL TESTIMONY OF
WITNESS KAY -- ERRATA

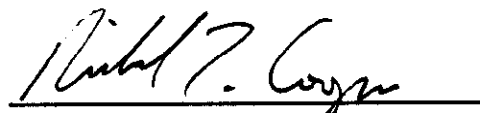
The United States Postal Service hereby gives notice that it is filing today additional revisions to the rebuttal testimony of witness Kay.

In the testimony (USPS-RT-13), the changes are as indicated on the attached sheet. Revised pages of the testimony are also attached. Note that with respect to Exhibit USPS-RT-13E, no new revisions are made, but to remedy inadvertent inclusion of unintended changes to this Exhibit included in earlier errata filed on August 18, 2000, corrected substitute pages are herewith included for this Exhibit.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993, Fax -5402
August 22, 2000

Errata to Rebuttal Testimony of Witness Kay,

USPS-RT-13

(August 22, 2000)

1. Page 4, line 19: Remove quote mark before the word 'because'
2. Page 13, continuation of footnote 6 from page 12, last sentence: Change 'terms' to 'the terms "parcel post delivery" and "parcel delivery"'
3. Page 23, Table 4. headings to columns 1 and 2: Change 'C/S 7' to 'C/S 10'
4. Page 23, Table 4, Column 1, Column Source/Notes line: Change 'WS 10.1.2. C12 & WS 10.2.2 C12' to 'USPS-LR-I-80, CS10.xls'
5. Page 23, Table 4, Column 2, Column Source/Notes line: Change 'WS 10.1.2. C12 & WS 10.2.2 C12' to 'USPS-LR-I-450, CS10.xls'
6. Exhibit USPS-RT-13E: Substitute pages 1 through 5 to correctly implement errata filed on 8/18/00.

1 related. Her weight studies must be used within the proper context, which is to provide
2 a general indication of the effect of weight on cost *within* a rate category. In fact, when
3 delivery costs must be quantified precisely *across* rate categories, as they are in Ms.
4 Daniel's delivery cost study (USPS-LR-I-95), elemental load costs are distributed by
5 piece within shape.

6 The weight studies provided by witness McGrane in Docket No. R97-1 distributed
7 elemental load costs among ounce increments by pieces within shape, following the
8 accepted methodology used to develop city carrier elemental load costs in cost segment
9 7. For this Docket, Ms. Daniel revises the assumptions used in the weight study, and
10 distributes elemental load costs within subclass by weight, although she is aware that
11 studies show that elemental load costs vary by shape, USPS-T-23 at 8, and that no new
12 studies have been undertaken that show the effect of weight on city carrier costs.
13 AAPS/USPS-T28-3 Tr. 4/ 1159.

14 Her purpose in distributing elemental load costs by weight is to set an upper
15 bound of the effects of weight for city carrier costs. Ms. Daniel states "I allocated
16 elemental load costs on the basis of weight to illustrate more of an upper bound that
17 weight could have on carrier street costs." Tr 4/1395. "Using weight as a key
18 compensates for any weight-related effects in route and access time, which have been
19 allocated on the basis of piece...", USPS-T-28 at 8, because "...[i]n fact, route time is
20 allocated on the basis of weight in the CRA." Tr 4/1396. Ms. Daniel's distribution of
21 elemental load costs among ounce increments within a rate category does exactly as
22 she intends and sets an upper bound for the effects of weight on city carrier costs *within*
23 rate categories.

1 other USPS publications that show the Postal Service frequently uses the term 'Parcel
2 Post' to mean all parcels.

3 Table 2 shows the percentage distribution of pieces on special purpose routes by
4 individual route type. Many volumes besides Parcel Post are handled on Exclusive
5 Parcel Post Routes. This table was generated using data from the Docket No. R97-1
6 special purpose route study, Docket No. R97-1, USPS-LR-H-152. Table 2 shows that
7 only 11.9% of the pieces delivered on Exclusive Parcel Post Routes are for Parcel Post,
8 while 12.0% of the pieces delivered on Non-Parcel Combination Routes are for Parcel
9 Post. Clearly, the neither the name nor the description of the route can be used as the
10 indicator of the type of mail delivered on the route⁷. The assignment of Exclusive
11 Parcel Post Route costs as product specific to Parcel Post is clearly wrong.

12

Parcel Post route in this library reference is "... a regular route devoted entirely to parcel post delivery." For other examples of this interchangeability of the terms "parcel post delivery" and "parcel delivery" see Handbook M-39, Chapter 1, Administration of City Delivery Service, p. 8-9 and M-41 Duties and Responsibilities of City Delivery Carriers, Chapter 6, p. 73-74, shown in Exhibit USPS-RT-13D.

⁷ As an alternative approach to the method described in his testimony, Mr. Luciani suggests distributing costs for Exclusive Parcel Post and Parcel Post Combination routes separately to the classes of mail delivered to them. USPS/UPS-T5-6a, Tr. 25/11870-11871. Mr. Luciani does not suggest what variability to apply to these costs, or what to do with costs for the other special purpose route types. Witness Nelson's Docket No. R97-1, USPS-T-19 activity-based analysis provides both appropriate variabilities and distribution keys for all special purpose route costs.

TABLE 4. UPDATED RURAL CARRIER COSTS FOR BASE YEAR 1998

LINE NO	CLASS, SUBCLASS, OR SPECIAL SERVICE	TOTAL C/S 10 AS FILED	TOTAL C/S 10 WITH UPDATES	DIFFERENCE C/S 10	PIGGYBACK FACTORS	DIFFERENCE C/S 10 WITH PIGGYBACKS	PERCENTAGE CHANGE C/S 10
	COLUMN NUMBER UNITS COLUMN SOURCE/NOTES	(1) \$(000) USPS-LR-I-80, CS010.xls	(2) \$(000) USPS-LR-I-450, CS10.xls	(3) \$(000) =C2-C1	(4) % USPS-T-21, Attachment 10	(5) \$(000) =C3xC4	(6) % =C3/C1
1	FIRST-CLASS MAIL:						
2	SINGLE-PIECE LETTERS	288,432	299,750	11,318	1.242	14,057	3.9%
3	PRESORT LETTERS	222,696	240,248	17,552	1.242	21,800	7.9%
4	TOTAL LETTERS	511,128	539,998	28,870		35,857	5.6%
5	SINGLE-PIECE CARDS	16,411	17,010	599	1.242	744	3.6%
6	PRESORT CARDS	10,164	10,721	557	1.242	692	5.5%
7	TOTAL CARDS	26,575	27,731	1,156		1,436	4.3%
8	TOTAL FIRST-CLASS	537,703	567,729	30,026		37,292	5.6%
9	PRIORITY MAIL	24,079	30,355	6,276	1.242	7,795	26.1%
10	EXPRESS MAIL	6,133	5,958	(175)	1.242	(217)	-2.9%
11	MAILGRAMS	167	172	5	1.234	6	3.0%
12	PERIODICALS:						
13	IN-COUNTY	15,355	13,814	(1,541)	1.242	(1,914)	-10.0%
14	OUTSIDE COUNTY:						
15	REGULAR	119,587	107,582	(12,005)	1.242	(14,910)	-10.0%
16	NON-PROFIT	35,517	31,951	(3,566)	1.242	(4,429)	-10.0%
17	CLASSROOM	1,010	909	(101)	1.241	(125)	-10.0%
18	TOTAL PERIODICALS	171,469	154,256	(17,213)		(21,378)	-10.0%
19	STANDARD MAIL (A):						
20	SINGLE-PIECE RATE	1,072	1,192	120	1.241	149	11.2%
21	COMMERCIAL STANDARD:						
22	ENHANCED CARR RTE	326,363	304,393	(21,970)	1.242	(27,287)	-6.7%
23	REGULAR	350,762	345,947	(4,815)	1.242	(5,980)	-1.4%
24	TOTAL COMMERCIAL	677,125	650,340	(26,785)		(33,267)	-4.0%
25	AGGREGATE NONPROFIT:						
26	NONPROF ENH CARR RTE	13,918	13,291	(627)	1.242	(779)	-4.5%
27	NONPROFIT	69,221	69,648	427	1.242	530	0.6%
28	TOTAL AGGREG NONPROFIT	83,139	82,939	(200)		(248)	-0.2%
29	TOTAL STANDARD (A)	761,336	734,471	(26,865)		(33,366)	-3.5%
30	STANDARD MAIL (B):						
31	PARCELS ZONE RATE	11,511	15,888	4,377	1.241	5,432	38.0%
32	BOUND PRINTED MATTER	11,761	15,552	3,791	1.242	4,708	32.2%
33	SPECIAL STANDARD	4,192	5,559	1,367	1.241	1,696	32.6%
34	LIBRARY MAIL	805	957	152	1.237	188	18.9%
35	TOTAL STANDARD (B)	28,269	37,956	9,687		12,025	34.3%
36	US POSTAL SERVICE	1,336	1,361	25	1.240	31	1.9%
37	FREE MAIL	734	903	169	1.238	209	23.0%
38	INTERNATIONAL MAIL	2,786	2,949	163	1.241	202	5.9%
39	TOTAL MAIL	1,534,012	1,536,110	2,098		2,598	0.1%
40	SPECIAL SERVICES:						
41	REGISTRY	2,588	2,515	(73)	1.242	(91)	-2.8%
42	CERTIFIED	62,423	60,647	(1,776)	1.242	(2,206)	-2.8%
43	INSURANCE	4,870	4,732	(138)	1.241	(171)	-2.8%
44	COD	2,872	2,789	(83)	1.241	(103)	-2.9%
45	SPECIAL DELIVERY	-	-	-		-	
46	MONEY ORDERS	1,087	1,058	(29)	1.241	(36)	-2.7%
47	STAMPED ENVELOPES	-	-	-		-	
48	SPECIAL HANDLING	-	-	-		-	
49	POST OFFICE BOX	-	-	-		-	
50	OTHER	22	21	(1)	1.182	(1)	-4.5%
51	TOTAL SPECIAL SERVICES	73,862	71,762	(2,100)		(2,608)	-2.8%
52	TOTAL VOLUME VARIABLE	1,607,874	1,607,872	(2)		(10)	
53	OTHER	1,742,818	1,742,818				
54	TOTAL COSTS	3,678,215	3,678,213				

**COSTING OF DDU PARCEL POST USING USPS
METHODOLOGY, MODIFIED FROM EXHIBIT UPS-T-51
USING USPS COSTING METHODOLOGY**

LINE NO.	FACTOR	CITY CARRIER	RURAL CARRIER	WTD AVERAGE
		[A]	[B]	[C]
	1. Carrier Costs			
1	TY Wage Rate	29.56	23.87	
2	Routes	150,507	66,059	
3	Weighting by Route	0.69	0.31	
4	Total Delivery (\$/pc)	\$ 0.361	\$ 0.199	
5	TY Piggyback Factor	1.429	1.242	
6	Total w/Piggyback (\$/pc)	0.516	0.247	0.434
	2. Mailhandler Costs			
7	Manual Sort at DDU			0.0945
8	Total Cost			0.528
9	3. Contingency		2.50%	0.541

- 1 USPS-T-26, Attachment S, p. 1
- 2 Exhibit UPS-T-51, Number of Routes, rows 7 and 9. City Carrier Routes excludes foot routes.
- 3 $[A2] / [A3] + [B3]; [B2] / [A3] + [B3]$
- 4 City Carrier CPP' C3L6; 'Rural Carrier CPP' L3
- 5 USPS-T-21, Attachment 11, for Parcel Post
- 6 $L4 * L5; [C]=[A5]*[A3] + [B5]*[B3]$
- 7 Exhibit UPS-T-51, Bottom-Up Costing of DDU-Entry Parcel Post, Note 8
- 8 $[C6]+[C7]$
- 9 $[C]=(1+[B9])*[C8]$

**RURAL CARRIER PARCEL DELIVERY COST PER
PIECE USING
USPS COSTING METHODOLOGY**

1	Rural Evaluation Factor for Parcels - Minutes per Piece		0.500
2	Rural Carrier Wage Rate, TY01	\$	23.87
3	Cost Per Piece	\$	0.199

NOTES

- 1 LR-1-450, WS 10.1.1, C2
- 2 USPS-T-26, Attachment S, P. 1
- 3 L1 / 60 * L2

CITY CARRIER PARCEL DELIVERY COST PER PIECE USING
USPS COSTING METHODOLOGY

LINE NO.	CRA COMPONENT	LETTER ROUTE DELIVERY PARCEL POST VVC, BY98	LETTER ROUTE DELIVERY PARCEL POST COST PER CCS PIECE, BY98	LETTER ROUTE DELIVERY PARCEL POST COST PER CCS PIECE, TY01
		(1) \$(000) Exhibit USPS-RT-XE, p. 5, L31	(2) \$ C1 / FY98 Parcel Post CCS Volume	(3) \$ C2 * TY01 Wage Rate / FY98 Wage Rate
	COLUMN NUMBER			
	UNITS			
	COLUMN SOURCE/NOTES			
	CALCULATIONS			
1	In-Office	7,405	\$ 0.043	\$ 0.049
2	Total Street Support	9,356	\$ 0.054	\$ 0.062
3	Motorized Accessing of Loop/Dismount and Deviation Delivery Stops (Volume Variable)	10,841	\$ 0.063	\$ 0.072
4	Total Access	113	\$ 0.001	\$ 0.001
5	Total Load	26,946	\$ 0.156	\$ 0.178
6	Total Letter Route Delivery	54,661	\$ 0.316	\$ 0.361
7	FY 98 Parcel Post Volume (CCS)	172,764		
8	FY 98 Carrier Wage Rate	\$ 25.92		
9	TY 01 Carrier Wage Rate	\$ 29.56		

NOTES:

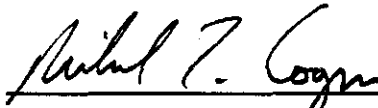
- 7 USPS-LR-I-450, [CS06&7.xls]'Input DK' L31
- 8 USPS-T-26, Attachment S, p. 1
- 9 USPS-T-26, Attachment S, p. 1

LINE NO.	CLASS, SUBCLASS, OR SPECIAL SERVICE	IN-OFFICE DIRECT LABOR	LOAD	ACCESS	ROUTE	STREET SUPPORT IN-OFFICE	STREET SUPPORT LOAD	STREET SUPPORT ACCESS	STREET SUPPORT ROUTE
	COLUMN NUMBER UNITS COLUMN SOURCE/NOTES	(1) \$(000) WS 6.0.2.1 C2	(2) \$(000) WS 7.0.3.1 C2	(3) \$(000) WS 7.0.3.1 C8	(4) \$(000) WS 7.0.3.1 C12	(5) \$(000) L54=WS 6.0.4 C3L17 L54 dist C1	(6) \$(000) L54=WS 6.0.4 C3L18 L54 dist C2	(7) \$(000) L54=WS 6.0.4 C3L21 L54 dist C3	(8) \$(000) L54=WS 6.0.4 C3L23 L54 dist C4
1	FIRST-CLASS MAIL:								
2	SINGLE-PIECE LETTERS	1,062,489	263,807	63,721	983	201,619	46,200	12,011	180
3	PRESORT LETTERS	469,730	208,304	23,119	736	89,137	36,480	4,358	135
4	TOTAL LETTERS	1,532,219	472,111	86,840	1,719	290,756	82,681	16,368	315
5	SINGLE-PIECE CARDS	54,429	16,448	4,239	54	10,329	2,881	799	10
6	PRESORT CARDS	18,876	11,578	1,561	46	3,582	2,028	294	8
7	TOTAL CARDS	73,305	28,026	5,800	100	13,910	4,908	1,093	18
8	TOTAL FIRST-CLASS	1,605,524	500,137	92,640	1,819	304,667	87,589	17,461	333
9	PRIORITY MAIL	37,595	52,249	27,297	18,341	7,134	9,150	5,145	3,356
10	EXPRESS MAIL	2,601	36,597	7,749	1,986	494	6,409	1,461	363
11	MAILGRAMS	-	83	83	84	-	15	16	15
12	PERIODICALS:								
13	IN-COUNTY	8,024	5,778	633	78	1,523	1,012	119	14
14	OUTSIDE COUNTY:								
15	REGULAR	135,536	44,998	4,933	591	25,720	7,880	930	108
16	NON-PROFIT	30,707	13,364	1,465	176	5,827	2,340	276	32
17	CLASSROOM	381	380	42	5	72	67	8	1
18	TOTAL PERIODICALS	174,648	64,520	7,073	848	33,141	11,299	1,333	155
19	STANDARD A:								
20	SINGLE PIECE RATE	13,309	1,505	2,781	1,509	2,526	264	524	276
21	COMMERCIAL STANDARD:								
22	ENHANCED CARR RTE	283,785	217,129	29,346	1,419	53,851	38,026	5,531	260
23	REGULAR	524,067	222,327	15,853	1,462	99,448	38,936	2,088	268
24	TOTAL COMMERCIAL	807,852	439,456	45,199	2,881	153,299	76,962	8,519	527
25	AGGREGATE NONPROFIT:								
26	NONPROF ENH CARR RTE	19,933	10,733	1,969	110	3,783	1,880	371	20
27	NONPROFIT	106,227	50,067	1,527	440	20,158	8,768	288	81
28	TOTAL AGGREG NONPROFIT	126,160	60,800	3,496	550	23,940	10,648	659	101
29	TOTAL STANDARD A	947,321	501,761	51,476	4,940	179,765	87,873	9,703	904
30	STANDARD MAIL (B):								
31	PARCELS ZONE RATE	6,927	27,312	10,011	10,841	1,314	4,783	1,887	1,984
32	BOUND PRINTED MATTER	6,895	23,454	15,007	6,132	1,308	4,107	2,829	1,122
33	SPECIAL STANDARD	1,868	11,141	5,871	4,289	354	1,951	1,107	787
34	LIBRARY MAIL	634	1,567	877	1,158	120	274	165	212
35	TOTAL STANDARD (B)	16,324	63,474	31,766	22,430	3,096	11,116	5,987	4,104
36	US POSTAL SERVICE	10,549	1,194	392	-	2,002	209	74	-
37	FREE MAIL	983	1,909	65	-	187	334	12	-
38	INTERNATIONAL MAIL	10,955	4,692	4,041	808	2,079	822	762	148
39	TOTAL MAIL	2,806,500	1,226,616	222,582	51,256	532,566	214,817	41,954	9,379
40	SPECIAL SERVICES:								
41	REGISTRY	1,683	5,437	-	-	319	952	-	-
42	CERTIFIED	27,400	138,956	-	-	5,199	24,335	-	-
43	INSURANCE	1,075	7,588	-	-	204	1,329	-	-
44	COD	728	3,715	-	-	138	651	-	-
45	SPECIAL DELIVERY	-	-	-	-	-	-	-	-
46	MONEY ORDERS	-	-	-	-	-	-	-	-
47	STAMPED ENVELOPES	-	-	-	-	-	-	-	-
48	SPECIAL HANDLING	-	-	-	-	-	-	-	-
49	POST OFFICE BOX	425	-	-	-	81	-	-	-
50	OTHER	4,308	522	-	-	817	91	-	-
51	TOTAL SPECIAL SERVICES	35,619	156,218	-	-	6,759	27,358	-	-
52	TOTAL VOLUME	2,842,119	1,382,834	222,582	51,256	539,325	242,175	41,954	9,379
53	FIXED	351,696	1,342,630	1,254,036	2,228,235	66,738	235,135	236,369	407,711
54	GRAND TOTAL	3,193,815	2,725,464	1,476,618	2,279,491	606,063	477,310	278,323	417,090

LINE NO.	CLASS, SUBCLASS, OR SPECIAL SERVICE	IN-OFFICE	LOAD	ACCESS	ROUTE	STREET SUPPORT IN-OFFICE	STREET SUPPORT LOAD	STREET SUPPORT ACCESS	STREET SUPPORT ROUTE
	COLUMN NUMBER UNITS COLUMN SOURCE/NOTES CALCULATIONS	(1) \$(000) L54=WS 7.0.1 C2L12 L1..L53 dist on Exhibit USPS-RT-13E, p. 4, C1	(2) \$(000) WS 7.0.3, C5-C7	(3) \$(000) WS 7.0.3, C13&C16	(4) \$(000) WS 7.0.3.1, C12; L54=WS 7.0.1 C2L31	(5) \$(000) L54=WS 7.0.1 C2L15 L1..L53 dist on C1	(6) \$(000) L54=WS 7.0.1 C2L17	(7) \$(000) L54=WS 7.0.1 C2L23 L1..L53 dist on Exhibit USPS-RT-13E P4, C3	(8) \$(000) L54=WS 7.0.1 C2L27 L1..L53 dist on Exhibit USPS-RT-13E P4, C4
1	FIRST-CLASS MAIL:								
2	SINGLE-PIECE LETTERS	1,135,818	258,892	18,920	983	197,629	45,560	10,029	161
3	PRESORT LETTERS	502,149	208,275	21,571	736	87,373	35,974	3,639	120
4	TOTAL LETTERS	1,637,967	467,167	40,491	1,719	285,002	81,534	13,668	281
5	SINGLE-PIECE CARDS	58,185	16,179	1,786	54	10,124	2,841	667	9
6	PRESORT CARDS	20,179	11,576	1,464	46	3,511	2,000	246	8
7	TOTAL CARDS	78,364	27,755	3,249	100	13,635	4,840	913	16
8	TOTAL FIRST-CLASS	1,716,331	494,922	43,740	1,819	298,637	86,374	14,581	298
9	PRIORITY MAIL	40,190	51,288	568	18,341	6,993	8,023	4,296	3,003
10	EXPRESS MAIL	2,781	34,825	24	1,986	484	6,320	1,220	325
11	MAILGRAMS	-	81	13	84	-	14	13	14
12	PERIODICALS:								
13	IN-COUNTY	8,578	5,768	360	76	1,493	998	100	12
14	OUTSIDE COUNTY:								
15	REGULAR	144,890	44,925	2,805	591	25,211	7,771	776	97
16	NON-PROFIT	32,826	13,343	833	176	5,712	2,308	231	29
17	CLASSROOM	407	380	24	5	71	66	7	1
18	TOTAL PERIODICALS	186,702	64,416	4,022	848	32,486	11,143	1,113	139
19	STANDARD A:								
20	SINGLE PIECE RATE	14,228	1,311	28	1,509	2,476	260	438	247
21	COMMERCIAL STANDARD:								
22	ENHANCED CARR RTE	303,371	217,062	27,394	1,419	52,786	37,488	4,619	232
23	REGULAR	560,236	222,258	13,843	1,462	97,480	38,396	2,485	239
24	TOTAL COMMERCIAL	863,607	439,320	41,237	2,881	150,265	75,884	7,114	472
25	AGGREGATE NONPROFIT:								
26	NONPROF ENH CARR RTE	21,309	10,727	1,817	110	3,708	1,854	310	18
27	NONPROFIT	113,558	50,046	921	440	19,759	8,647	240	72
28	TOTAL AGGREG NONPROFIT	134,867	60,774	2,739	550	23,467	10,500	550	90
29	TOTAL STANDARD A	1,012,701	501,405	44,003	4,940	176,207	86,654	8,102	809
30	STANDARD MAIL (B):								
31	PARCELS ZONE RATE	7,405	26,946	113	10,841	1,288	4,717	1,576	1,775
32	BOUND PRINTED MATTER	7,371	22,935	127	6,132	1,283	4,051	2,362	1,004
33	SPECIAL STANDARD	1,997	10,938	49	4,299	347	1,924	924	704
34	LIBRARY MAIL	678	1,536	9	1,158	118	271	138	190
35	TOTAL STANDARD (B)	17,451	62,354	298	22,430	3,036	10,962	5,000	3,672
36	US POSTAL SERVICE	11,277	1,163	117	-	1,962	206	62	-
37	FREE MAIL	1,051	1,905	27	-	183	330	10	-
38	INTERNATIONAL MAIL	11,711	4,322	260	808	2,038	810	636	132
39	TOTAL MAIL	3,000,184	1,216,680	93,072	51,256	522,026	211,837	35,033	8,391
40	SPECIAL SERVICES:								
41	REGISTRY	1,799	5,133	-	-	313	939	-	-
42	CERTIFIED	29,291	138,956	-	-	5,097	23,998	-	-
43	INSURANCE	1,149	7,588	-	-	200	1,310	-	-
44	COD	778	3,657	-	-	135	642	-	-
45	SPECIAL DELIVERY	-	-	-	-	-	-	-	-
46	MONEY ORDERS	-	-	-	-	-	-	-	-
47	STAMPED ENVELOPES	-	-	-	-	-	-	-	-
48	SPECIAL HANDLING	-	-	-	-	-	-	-	-
49	POST OFFICE BOX	454	-	-	-	79	-	-	-
50	OTHER	4,605	-	-	-	801	90	-	-
51	TOTAL SPECIAL SERVICES	38,077	155,333	-	-	6,625	26,979	-	-
52	TOTAL VOLUME	3,038,271	1,372,013	93,072	51,256	528,651	238,816	35,033	8,391
53	FIXED	351,896	1,322,358	1,214,098	2,228,235	61,194	231,872	197,378	364,785
54	GRAND TOTAL	3,414,240	2,694,371	1,307,170	2,144,721	594,069	470,688	232,411	373,176

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.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2993, Fax -5402
August 22, 2000