

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

POSTAL RATE AND FEE CHANGES

Docket No. R2006-1

DIRECT TESTIMONY
OF
MARK WALLACE. WHITE
ON BEHALF OF
U.S. NEWS & WORLD REPORT, L.P.

SEPTEMBER 6, 2006

1 My name is Mark Wallace White, and my title is Vice President of Manufacturing
2 for U.S. News & World Report, L.P., which publishes *U.S. News & World Report*
3 magazine (“U.S. News”). My testimony will focus on my analysis of the impact that
4 proposed Periodicals rates would have on U.S. News and explanations of discrepancies
5 between that analysis and the Postal Service’s statements regarding the proposed
6 Periodicals rates.

7 **Autobiographical Sketch**

8 Prior to joining U.S. News in 1995 as Manufacturing Finance Manager, I worked
9 in the newspaper industry as a journalist and manager. At U.S. News, I have worked in
10 various roles in production and distribution management, serving both U.S. News and
11 currently affiliated publications, which include the *New York Daily News*, and formerly
12 affiliated publications, which include *Fast Company* magazine and *The Atlantic Monthly*
13 magazine. From time to time, I also have provided consulting and other services to other
14 publications, including but not limited to *Radar Magazine*. For most of those publications
15 I analyzed and forecast distribution costs and was a key participant in the negotiation of
16 printing-and-distribution contracts.

17 This is my first time testifying before the Postal Rate Commission, though I
18 performed much of the financial analysis behind U.S. News’ participation in Docket No.
19 C2004-1 supporting the alignment of Periodicals postage rates with the Postal Service’s
20 costs.

21 I was graduated magna cum laude in 1979 from the University of Richmond with
22 a bachelor’s degree in history and journalism. I received a Master’s of Business

1 Administration from the College of William and Mary (with the top grade-point average
2 in the class of 1995).

3 **Background on U.S. News**

4 The primary business of our privately held company is publishing the weekly
5 newsmagazine *U.S. News & World Report*, along with a related Web site. We mail more
6 than 93 million copies annually via Periodicals Class. The Postal Service our largest
7 vendor, though we also distribute copies via newsstand sales and an electronic edition.

8 U.S. News has responded to increases in postal rates over the past thirty years
9 with such strategies as reducing our magazine's trim size and basis weight of paper. We
10 have adjusted our mailing practices many times to take advantage of such rate incentives
11 as low carrier-route piece rates, barcoding, the use of ADC entries, and palletization. In
12 1996, we were a pioneer in the use of poolshipping for weekly magazines to achieve
13 more dropship discounts, which many in the industry thought was impossible for such a
14 time-sensitive publication. The U.S. Postal Service has recognized U.S. News as a
15 "poster child" for efficient mailing, as shown in the USPS brochure and poster entitled
16 "The Perfect Bundle," both of which were part of Witness McCrery's response to
17 MPA/USPS-T42-4c. The brochure includes two depictions and the poster one of a bundle
18 of U.S. News copies.

19 Following the Postal Rate Commission's final order last year in Docket No.
20 C2004-1, we redoubled our efforts to get our magazine involved in co-mail or other
21 forms of co-palletization. As Michael J. Armstrong testified in Docket No. C2004-1, the
22 current rate structure provides decreasing returns to scale for co-mailing such that there is
23 relatively little incentive to co-mail a publication with more than 1,900,000 copies per

1 mailing. We interpreted the commission's order in Docket No. C2004-1 as an
2 endorsement of the concept that Periodicals rates should encourage efficient bundling and
3 containerization. That meant, we believed, that we needed to get ready for a future in
4 which large Periodicals mailers would have sufficient incentives to engage in co-mailing
5 and other forms of co-palletization.

6 Our efforts came to fruition in February of this year when Quad/Graphics, our
7 printer, began co-binding the majority of our mailed copies with *Information Week*, a
8 weekly magazine that mails more than 400,000 copies per issue. Almost every week
9 since then, approximately 1.2 million copies of U.S. News printed in Quad's Saratoga
10 Springs, NY and Hartford, WI plants have been co-bound with several hundred thousand
11 copies of *Information Week*. Co-binding uses selective-binding technology to combine
12 the assembling and mailing of two or more publications on the same binding line. The
13 effect on postage is identical to co-mailing, with copies of the publications being mixed
14 together in the same bundles as well as in the same containers. Although we have no
15 direct knowledge of *Information Week*'s postal costs, our models indicate its postal
16 savings from co-binding are far greater than ours. Nevertheless, we have eagerly worked
17 with Quad/Graphics to make co-binding work because of the immediate net savings to us
18 and because we thought it positioned us well for truly cost-based Periodicals rates. We
19 have also worked with Quad/Graphics in publicizing to co-binding program in hopes it
20 would inspire other mailers to make Periodicals Class mailing more efficient.

1 **Overall Impact on U.S. News**

2 I modeled the impact of the proposed rates on the five issues of U.S. News published
3 with May 2006 cover dates, making two simplifying assumptions that had no material
4 effect on the results:

- 5 1) The model is based on a single version of each issue, whereas each actual issue
6 had multiple versions with some variation in copy weights and advertising
7 percentages. By using average advertising percentage and copy weight for each
8 issue, the model calculated postage under current rates to within 0.1% accuracy.
- 9 2) Container charges under the new rates were based on the total number of pallets
10 and sacks in each mailing. A small portion of these would presumably be charged
11 to the smaller-circulation publication (*Information Week*) with which we co-bind
12 most copies. But even with U.S. News bearing all of the container charges, such
13 charges would not have totaled more than 0.3% of the total postage for any of the
14 May issues.

15 The model calculated the rate increase for the five issues at 16.0%, with the amount
16 per issue ranging from 14.6% to 19.2%. The major factors causing the variation from
17 issue to issue were advertising percentage, copy weight, and the number of copies
18 qualifying for experimental co-palletization discounts.

19 *U.S. News* has a long history of responding to the Postal Service's pricing signals by
20 changing the way we mail – thereby minimizing our postage costs (and the Postal
21 Service's costs as well). The rates proposed in Docket No. RC2006-1, however, provide
22 no obvious new opportunities to make our mail more efficient for the Postal Service and
23 may in fact result in mail that is less efficient for the Postal Service to handle.

1 ***U.S. News' Dropship Incentives***

2 The proposed rates would for the most part reduce our incentives to dropship. For
3 example, the savings from moving one piece from Zone 1 or 2 to DADC would decrease
4 by an average of 55.5%, with a range of 50.4% to 64.6% for the five issues. The savings
5 from moving a piece from Zone 1 or 2 to DSCF would decrease an average of 24.1%,
6 ranging from 18.1% to 35.1%. The savings from moving a piece from DADC to DSCF
7 would increase by 47.4%, ranging from 40.6% to 59.0%. In summary, we would have
8 less incentive to reach relatively small, out-of-the-way ADCs but somewhat more
9 incentive to move DADC copies to DSCF.

10 Here are examples for three entries that we were able to open within the past two
11 years as part of a change in printing locations:

- 12 • Macon, GA: Approximately 3,783 DSCF copies and 5,164 DADC copies. Current
13 savings from using Macon instead of entering the copies in the Atlanta area is
14 \$200 per issue and would decline to \$118 per issue with the proposed rates.
- 15 • Shreveport, LA: Approximately 2,396 DSCF copies and 3,678 DADC copies.
16 Current savings from using Shreveport instead of a nearby entry (e.g. Dallas or
17 Baton Rouge) is \$134 per issue and would decline to \$78 per issue with the
18 proposed rates.
- 19 • Sioux Falls, SD: Approximately 2,352 DSCF copies, 4,589 DADC copies, and
20 6,290 zoned copies. Current savings from using Sioux Falls instead of entering
21 the copies in St. Paul, MN is \$182 per issue and would decline to \$120 per issue
22 with the proposed rates.

1 We have already had preliminary discussions with Quad/Graphics, our current
2 printer/distributor, regarding whether the postal savings from such entries would justify
3 the costs of serving those entries if the proposed rates were enacted. We have also
4 pointed out the somewhat increased incentive to move copies from DSCF to DDDU.
5 (Currently, less than 1% of our copies qualify for DDU discounts. All are entered at SCFs
6 that serve as DDUs for some of their associated ZIP codes.) But Quad/Graphics' apparent
7 reluctance to develop a DDU program was summed up by the following comment from
8 Joseph E. Schick, Quad/Graphics' Director of Postal Affairs, in an article distributed to
9 customers in June 2006 and posted on the company's Web site: "We question why that
10 [enhanced DDU incentive for Periodicals] would happen now considering that if the
11 Postal Service does deploy FSS technology (Spring 2008), DDU entry for flats would be
12 eliminated except for Saturation Mail. We are also in the middle of a transportation
13 environment that makes it extremely difficult to secure enough equipment and drivers to
14 meet our current needs of delivering to hundreds of SCFs multiple times each week.
15 What would happen if we needed drivers to make thousands of stops each week at DDUs
16 around the country? Where would the drivers and equipment be found, and if found,
17 what would it cost?"

18 ***U.S. News' Co-Palletization Incentives***

19 The proposed rates would provide little additional incentive to expand our co-
20 binding program and might actually make co-binding with *U.S. News* less attractive for
21 other publishers. The proposed rates would slightly enhance the savings on piece costs
22 for forms of co-palletization that entail complete commingling of mail, such as co-
23 mailing and co-binding. The most relevant change for *U.S. News* is that the spread

1 between 5-digit automated and basic carrier-route piece rates would rise from 6.6 cents to
2 6.9 cents. But with approximately three-fourths of our pieces at the basic carrier-route
3 rate without any form of co-palletization, the piece rates would still provide relatively
4 little incentive for large mailers like U.S. News to co-palletize. The Postal Service has
5 presented the proposed container rate as a significant incentive to co-palletize, but co-
6 palletization would have an insignificant impact on container costs for a large efficient
7 mailer like U.S. News.

8 For a smaller mailer like *Information Week*, lower piece costs are only part of the
9 incentive to co-bind with U.S. News. Commingling with U.S. News enables a smaller
10 mailer to piggyback on our extensive dropship program, which can mean fairly extensive
11 co-palletization discounts under current rates. Although we have no information on
12 *Information Week*'s mailing costs, we do know that for many of our postal entries
13 *Information Week* typically does not have enough volume on its own to create a pallet.
14 We assume that in those cases it receives co-palletization discounts when copies for that
15 entry are co-bound with U.S. News. The proposed rates would eliminate the co-
16 palletization discounts and, as shown above, generally reduce the dropship incentives for
17 relatively lower weight publications like U.S. News and *Information Week*.

18 **How would U.S. News Respond to the Rates?**

19 U.S. News has a long history of changing our mailing practices in response to
20 signals in postal rates. But we see almost nothing we could do to minimize the impact of
21 the proposed rates. With more than 99 percent of our copies already palletized and an
22 average of more than 2,000 pieces per container, there is little we could do in response to
23 the proposed container rate. The proposal would not create much impetus to expand the

1 co-binding of U.S. News. And, as discussed above, it might actually give us incentives to
2 increase our postage costs (and the Postal Service's costs) and reduce our freight costs by
3 eliminating ADC entries.

4 **Discrepancies with Witness Tang's Testimony**

5 The above analyses are significantly at odds with the Postal Service's statements
6 regarding the proposed rates. A comparison of the analysis with the testimony of Witness
7 Tang raises three obvious questions:

- 8 1) How could the proposal weaken U.S. News' incentives to dropship if, as Witness
9 Tang believes (USPS T-35 page 9, lines 17-18), "mailers, both large and small,
10 would have the potential to move significant volume of mail to destinating
11 facilities."
- 12 2) Given Witness Tang's expectation that "mailers would have comparable if not
13 better incentives" to co-palletize (USPS T-35 page 11, line 12), how could the
14 proposal have so little favorable impact on U.S News' co-palletization incentives
15 and perhaps a negative impact on other mailers' incentives to co-palletize with
16 U.S. News?
- 17 3) If the Postal Service's proposal complies with the Postal Rate Commission's
18 encouragement to "make progress toward a more cost-based [Periodicals rate]
19 structure," as Witness Tang indicates (USPS T-35 page 4, lines 20-21), why
20 would the rate increase for an efficient mailer like U.S. News be so much above
21 the average for outside-county Periodicals?

1 **The Dropship Discrepancy**

2 Comparisons between dropship incentives under current and proposed rates
3 would yield widely varied results, depending upon the publication. For some publications
4 – especially high-volume, higher weight publications not involved in co-palletization –
5 the dropship incentives would no doubt be significantly enhanced. But for a light
6 publication like U.S. News that is extensively palletized and dropshipped, the new
7 dropship editorial discounts and enhanced dropship piece discounts would not come close
8 to making up for loss of the dropship-pallet discount.

9 The Postal Service’s focus seems to be not on preserving dropship incentives for
10 large mailers like U.S. News but enhancing dropship incentives for smaller mailers.
11 (Unlike Witness Tang, I refer to “small mailers” and “large mailers” rather than “smaller-
12 circulation publications” and “larger-circulation publications”. “Circulation” refers to all
13 forms of distribution, including newsstand sales and private delivery; Witness Tang’s
14 data apparently shows only the number of mailed copies, not total circulation. There are
15 certainly many small mailers that have total circulation in the hundreds of thousands.)

16 Having little data ourselves on small Periodicals mailings, we turned to data
17 provided by Witness Tang regarding twelve co-palletized publications in response to an
18 interrogatory from the Magazine Publishers of America, Inc. (MPA/USPS-T35-17). The
19 “Tang Twelve” publications’ mailings range from 9,620 copies to 36,663 copies each.
20 Modeling a publication’s dropship incentives under current and proposed rates requires
21 only a few data points – copy weight, advertising percentage, and the proportion of co-
22 palletized, dropshipped copies that are eligible for experimental co-palletization

1 discounts. Witness Tang's data show copy weight and advertising percentage and
2 indicate that no copies would be dropshipped if they were not co-palletized.

3 The spreadsheet "R2006-1 Tang12 Dropship.xls" shows the results of the
4 analysis. In the model for each publication, "Dropship Pallet" is shown as 1.1 cents per
5 copy, which is the difference between the dropship-pallet discount and the other-pallet
6 discount. For the sake of simplicity, the model assumes one copy per piece, though most
7 of the Tang Twelve have a minimal number of multi-copy pieces. The "Summary" sheet
8 demonstrates that, for all twelve publications, the incentive to move copies from Zone 1
9 or 2 to DADC or DSCF would be significantly reduced, by an average of 41 percent and
10 21 percent, respectively. For most, the incentive to move copies from DADC to DSCF
11 would be slightly enhanced, by an average of 13 percent. Given Witness Tang's
12 statement that "over 64 percent of the co-palletized Periodicals pieces were dropshipped
13 to the DADC and over 25 percent to the DSCF" (Tang response to ABM/USPS-T35-
14 16b), the most significant issue for these publications is the incentive to move pieces
15 from zoned to DADC.

16 Admittedly, the proposed container charge would give these publications a new
17 incentive to co-palletize. But the significant reduction of dropship incentives might mean
18 that some co-palletized copies would not be dropshipped. The Postal Service's goal was
19 "to offer price signals to change the behavior of those not dropshipping" and not "to deny
20 discounts to those that are already reducing the Postal Service costs [sic] by
21 dropshipping" (Tang response to MH/USPS-T35-10). But for small mailers that have
22 responded to the price signals in current rates by co-palletizing and dropshipping, the

1 proposed Periodicals rates would in fact deny discounts and offer price signals to
2 discourage dropshipping.

3 **The Co-Palletization Discrepancy**

4 Witness Tang has acknowledged that her initial analysis of co-palletization incentives
5 with the proposed rates was flawed (response to MPA/USPS-T35-28c). But even her
6 corrected testimony and responses indicate several misunderstandings regarding how
7 mailers are co-palletizing.

- 8 • Witness Tang makes a false distinction between co-palletization and co-mailing.
9 Note her response to MPA/USPS-T35-17j, where she states, “The impact on co-
10 mailed publications is expected to be similar to that on co-palletized ones, in
11 terms of palletization and dropshipping.” She indicates that her co-palletization
12 analysis focused only on situations where bundles of different publications are put
13 onto the same pallets, not on co-mailing and other strategies that commingle
14 publications within bundles. But the Postal Service’s regulations for the
15 experimental co-palletization discounts describe co-palletization as any process
16 that involves the presorting together of “at least two different Periodicals
17 publications or two different editions, segments, or versions of a Periodicals
18 publication.” (Domestic Mail Manual, Section 709-3.1.3a.) Co-mailing, co-
19 binding, and selective binding are among the techniques for commingling
20 different publications or versions within bundles and that qualify for the
21 experimental co-palletization discounts.
- 22 • Witness Tang assumes that co-palletization incentives for co-mailed publications
23 are similar to those of the co-palletized publications she studied (that is, the Tang

1 Twelve). But co-mail often involves larger mailers and larger total mailstreams,
2 meaning that the co-palletization incentives for co-mailed publications are often
3 quite different than those of the Tang Twelve. (For example, in Exhibit A of his
4 testimony in C2004-1, Witness Schick detailed a co-mailing in which twelve of
5 the thirteen publications had more copies than did any of the Tang Twelve.) One
6 significant difference is that larger mailers tend to have more copies per container
7 than do smaller mailers, which means larger mailers would have less incentive
8 than smaller mailers to use co-palletization as a means of minimizing the
9 proposed container rate. That means that the twelve publications Witness Tang
10 chose for her co-palletization analysis are by no means a representative sample of
11 the universe of publications involved in co-palletization.

- 12 •Witness Tang states that “it is likely that a co-palletization program achieving a
13 pallet size of around 1,600 pieces will involve co-palletizing more than two
14 publications” (response to ABM/USPS-T35-12). The U.S. *News-Information*
15 *Week* co-binding program, in fact, typically creates pallets averaging more than
16 3,000 pieces.
- 17 •Witness Tang’s analysis is based on the assumption that the Postal Service has data
18 showing how co-palletized publications would be mailed if they were not co-
19 palletized. In response to a question from Commissioner Hammond, she states,
20 “when I assess the impact on the currently co-palletized mail, the way to look at
21 the absolute incentives, relative incentives, is actually to look at what if they don’t
22 co-pal under the proposed rate, take the differential from the one if they co-pal
23 using the same set of rates which was under the proposed rates and compare the

1 incentives they are getting under the proposed rates with the incentive they are
2 getting now and you can clearly see that the incentives are at least comparable”
3 (transcript page 1877, lines 13-22). Witness Tang cannot possibly know what
4 mailers would pay “if they don’t co-pal under the proposed rates” because she
5 does not know how they would mail if they did not co-palletize. Mailers
6 themselves often do not have that information. Take, for example, a supplemental
7 mailing of 12,400 copies of *Radar Magazine* that the printer of that magazine
8 included in a large co-mail run last year. If Witness Tang had studied that mailing,
9 she would have seen that 97 percent of the copies were dropshipped to hundreds
10 of SCFs and that 56% of the copies were eligible for an experimental co-
11 palletization discount. She could also have seen data supporting those co-
12 palletization discounts, which would have shown how the mailing would have
13 looked if it had not been co-mailed but had still gone to all of the same entries,
14 with of course at least one container per entry. But that data in no way describes
15 how *Radar Magazine* would have been mailed without co-palletization. The
16 printer would not have transported a mailstream of less than 7000 pounds to 200
17 or more entries. Without co-mail, most of the copies would have been origin
18 entered -- but there is no way for the Postal Service to see that from the reports
19 submitted for *Radar Magazine*. With the proposed charge of 85 cents per
20 container, there would be even more incentive to origin-enter mail in mixed-ADC
21 containers rather than in dropshipped sacks.

1 **The Cost-Based Discrepancy**

2 As Michael J. Armstrong testified in Docket No. C2004-1, U.S. News is such an
3 efficient mailer that a move to true cost-based Periodicals rates would reduce our
4 postage costs by more than 10 percent. The Postal Service indicates that its proposed
5 Periodicals rates are more cost-based than are current rates. But the proposed rates
6 would increase U.S. News' postage costs far more than the average for outside-
7 county Periodicals. The Postal Service's intent may well have been to move
8 Periodicals toward more cost-based rates, but the analyses I presented above
9 demonstrate a disconnect between the Postal Service's intent and its proposal.

10 The plaintiffs in the Docket No. C2004-1 case effectively demonstrated the poor
11 relationship between the Postal Service's costs and Periodicals postal rates. They
12 showed that the Postal Service's major cost drivers for handling Periodicals are
13 related to pieces, bundles, containers, and weight. The current Periodicals rate
14 structure virtually ignores bundles and containers and inadequately reflects the Postal
15 Service's weight-based transportation costs. The Postal Service in essence uses
16 revenue from piece and weight charges to cover its costs of handling Periodicals
17 bundles and containers. As a result, it has to overcharge for pieces (especially
18 efficiently sorted pieces) and for the weight of dropshipped mail. In an attempt to
19 send price signals that encourage more efficient mailing, it has in recent years
20 introduced such features as the dropship-pallet discount and the experimental co-
21 palletization discounts. Those admittedly imperfect discounts did not cure the
22 underlying problem – the mismatch of rates to cost drivers – but they at least act as
23 bandages.

1 Now the Postal Service proposes to rip the bandages off without healing the
2 wound. The proposed rates would still overcharge for pieces, especially efficiently
3 presorted pieces, but there would no longer be such incentives as the dropship-pallet
4 discount to soften that overcharge. The new dropship-editorial rates are certainly a
5 positive move and may serve to create a more cost-based rate structure for relatively
6 heavy publications. But for a light, efficiently presorted, and extensively dropshipped
7 publication like U.S. News, no amount of tinkering with weight rates can overcome
8 the overcharges for efficient pieces.

EXHIBIT A // EFFECT OF PROPOSED RATES ON THE DROPSHIP INCENTIVES FOR TWELVE CO-PALLETIZED PUBLICATIONS

RC2006-1

Effect of Proposed Rates on the Dropship Incentives for Twelve Co-Palletized Publications

Source: |"Response of Postal Service Witness Tang to Interrogatory of Magazine Publishers of America, Inc. (MPA/USPS-T35-17)"

Change in savings (Proposed Rates vs. RC2005 rates) of going

FROM: Zone 1/2 DADC Zone 1/2
 TO: DADC DSCF DSCF

PUBLICATION

Pub 1	-33%	8%	-17%
Pub 2	-36%	16%	-16%
Pub 3	-30%	16%	-13%
Pub 4	-44%	8%	-25%
Pub 5	-30%	17%	-12%
Pub 6	-39%	29%	-15%
Pub 7	-34%	14%	-16%
Pub 8	-53%	6%	-32%
Pub 9	-64%	-3%	-43%
Pub 10	-57%	-1%	-37%
Pub 11	-40%	15%	-20%
Pub 12	-31%	27%	-10%
Average	-41%	13%	-21%
Best	-30%	29%	-10%
Worst	-64%	-3%	-43%

Weight 0.7495
 Ad% 71.30%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.534394	\$ 0.235	\$ 0.1256	\$ 0.251	\$ 0.1341		
Editorial Weight	0.215107	\$ 0.203	\$ 0.0437	\$ 0.210	\$ 0.0452		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.1492		\$ 0.1763		
Zone 1/2							
Advertising Weight	0.534394	\$ 0.261	\$ 0.1395	\$ 0.279	\$ 0.1491		
Editorial Weight	0.215107	\$ 0.203	\$ 0.0437	\$ 0.232	\$ 0.0499		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1831		\$ 0.1990		
Savings, Zone 1/2 to ADC			\$ 0.0339	\$ 0.0227	(0.0112)		-33.0%
SCF							
Advertising Weight	0.534394	\$ 0.214	\$ 0.1144	\$ 0.230	\$ 0.1229		
Editorial Weight	0.215107	\$ 0.203	\$ 0.0437	\$ 0.193	\$ 0.0415		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.1280		\$ 0.1534		
Savings, ADC to SCF			\$ 0.0212	\$ 0.0229	0.0017		7.8%
Savings, Zone 1/2 to SCF			\$ 0.0551	\$ 0.0456	(0.0095)		-17.3%
50-50			0.044505	0.034135	(0.0104)		-23.3%

Weight 0.61
 Ad% 54.00%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.3294	\$ 0.235	\$ 0.0774	\$ 0.251	\$ 0.0827		
Editorial Weight	0.2806	\$ 0.203	\$ 0.0570	\$ 0.210	\$ 0.0589		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.1144		\$ 0.1386		
Zone 1/2							
Advertising Weight	0.3294	\$ 0.261	\$ 0.0860	\$ 0.279	\$ 0.0919		
Editorial Weight	0.2806	\$ 0.203	\$ 0.0570	\$ 0.232	\$ 0.0651		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1429		\$ 0.1570		
Savings, Zone 1/2 to SCF			\$ 0.0286	\$ 0.0184	(0.0102)		-35.6%
SCF							
Advertising Weight	0.3294	\$ 0.214	\$ 0.0705	\$ 0.230	\$ 0.0758		
Editorial Weight	0.2806	\$ 0.203	\$ 0.0570	\$ 0.193	\$ 0.0542		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0975		\$ 0.1189		
Savings, ADC to SCF			\$ 0.0169	\$ 0.0197	0.0028		16.4%
Savings, Zone 1/2 to SCF			\$ 0.0455	\$ 0.0381	(0.0074)		-16.3%
50-50			0.037023	0.02824	(0.0088)		-23.7%

Weight 0.738
 Ad% 59.10%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.436158	\$ 0.235	\$ 0.1025	\$ 0.251	\$ 0.1095		
Editorial Weight	0.301842	\$ 0.203	\$ 0.0613	\$ 0.210	\$ 0.0634		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.1438		\$ 0.1699		
Zone 1/2							
Advertising Weight	0.436158	\$ 0.261	\$ 0.1138	\$ 0.279	\$ 0.1217		
Editorial Weight	0.301842	\$ 0.203	\$ 0.0613	\$ 0.232	\$ 0.0700		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1751		\$ 0.1917		
Savings, Zone 1/2 to SCF			\$ 0.0313	\$ 0.0219	(0.0095)		-30.3%
SCF							
Advertising Weight	0.436158	\$ 0.214	\$ 0.0933	\$ 0.230	\$ 0.1003		
Editorial Weight	0.301842	\$ 0.203	\$ 0.0613	\$ 0.193	\$ 0.0583		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.1246		\$ 0.1476		
Savings, ADC to SCF			\$ 0.0192	\$ 0.0223	0.0031		16.3%
Savings, Zone 1/2 to SCF			\$ 0.0505	\$ 0.0441	(0.0064)		-12.6%
50-50			0.04092	0.032998	(0.0079)		-19.4%

Weight 0.4898
 Ad% 60.00%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.29388	\$ 0.235	\$ 0.0691	\$ 0.251	\$ 0.0738		
Editorial Weight	0.19592	\$ 0.203	\$ 0.0398	\$ 0.210	\$ 0.0411		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.0888		\$ 0.1119		
Zone 1/2							
Advertising Weight	0.29388	\$ 0.261	\$ 0.0767	\$ 0.279	\$ 0.0820		
Editorial Weight	0.19592	\$ 0.203	\$ 0.0398	\$ 0.232	\$ 0.0455		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1165		\$ 0.1274		
Savings, Zone 1/2 to SCF			\$ 0.0276	\$ 0.0155	(0.0121)		-43.8%
SCF							
Advertising Weight	0.29388	\$ 0.214	\$ 0.0629	\$ 0.230	\$ 0.0676		
Editorial Weight	0.19592	\$ 0.203	\$ 0.0398	\$ 0.193	\$ 0.0378		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0727		\$ 0.0944		
Savings, ADC to SCF			\$ 0.0162	\$ 0.0175	0.0013		8.2%
Savings, Zone 1/2 to SCF			\$ 0.0438	\$ 0.0330	(0.0108)		-24.6%
50-50			0.035727	0.02429	(0.0114)		-32.0%

Weight 0.7494
 Ad% 59.16%

ADC

	Units	RC2005		RC2006	
		Rates	Cost	Rates	Cost
Advertising Weight	0.443345	\$ 0.235	\$ 0.1042	\$ 0.251	\$ 0.1113
Editorial Weight	0.306055	\$ 0.203	\$ 0.0621	\$ 0.210	\$ 0.0643
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -
			\$ 0.1463		\$ 0.1726

Zone 1/2

Advertising Weight	0.443345	\$ 0.261	\$ 0.1157	\$ 0.279	\$ 0.1237
Editorial Weight	0.306055	\$ 0.203	\$ 0.0621	\$ 0.232	\$ 0.0710
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -
			\$ 0.1778		\$ 0.1947

Savings, Zone 1/2 to SCF \$ 0.0315 \$ 0.0221 (0.0094) -29.8%

SCF

Advertising Weight	0.443345	\$ 0.214	\$ 0.0949	\$ 0.230	\$ 0.1020
Editorial Weight	0.306055	\$ 0.203	\$ 0.0621	\$ 0.193	\$ 0.0591
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -
			\$ 0.1270		\$ 0.1500

Savings, ADC to SCF \$ 0.0193 \$ 0.0225 0.0032 16.6%

Savings, Zone 1/2 to SCF \$ 0.0508 \$ 0.0447 (0.0062) -12.2%

50-50 0.041182 0.033403 (0.0078) -18.9%

Weight 0.48
 Ad% 29.00%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.1392	\$ 0.235	\$ 0.0327	\$ 0.251	\$ 0.0349		
Editorial Weight	0.3408	\$ 0.203	\$ 0.0692	\$ 0.210	\$ 0.0716		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.0819		\$ 0.1035		
Zone 1/2							
Advertising Weight	0.1392	\$ 0.261	\$ 0.0363	\$ 0.279	\$ 0.0388		
Editorial Weight	0.3408	\$ 0.203	\$ 0.0692	\$ 0.232	\$ 0.0791		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1055		\$ 0.1179		
Savings, Zone 1/2 to SCF			\$ 0.0236	\$ 0.0144	(0.0092)		-39.1%
SCF							
Advertising Weight	0.1392	\$ 0.214	\$ 0.0298	\$ 0.230	\$ 0.0320		
Editorial Weight	0.3408	\$ 0.203	\$ 0.0692	\$ 0.193	\$ 0.0658		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0690		\$ 0.0868		
Savings, ADC to SCF			\$ 0.0129	\$ 0.0167	0.0038		29.4%
Savings, Zone 1/2 to SCF			\$ 0.0365	\$ 0.0311	(0.0054)		-14.9%
50-50			0.030081	0.022754	(0.0073)		-24.4%

Weight 0.66
 Ad% 59.00%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.3894	\$ 0.235	\$ 0.0915	\$ 0.251	\$ 0.0977		
Editorial Weight	0.2706	\$ 0.203	\$ 0.0549	\$ 0.210	\$ 0.0568		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.1264		\$ 0.1516		
Zone 1/2							
Advertising Weight	0.3894	\$ 0.261	\$ 0.1016	\$ 0.279	\$ 0.1086		
Editorial Weight	0.2706	\$ 0.203	\$ 0.0549	\$ 0.232	\$ 0.0628		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1566		\$ 0.1714		
Savings, Zone 1/2 to SCF			\$ 0.0301	\$ 0.0199	(0.0103)		-34.1%
SCF							
Advertising Weight	0.3894	\$ 0.214	\$ 0.0833	\$ 0.230	\$ 0.0896		
Editorial Weight	0.2706	\$ 0.203	\$ 0.0549	\$ 0.193	\$ 0.0522		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.1083		\$ 0.1308		
Savings, ADC to SCF			\$ 0.0182	\$ 0.0208	0.0026		14.3%
Savings, Zone 1/2 to SCF			\$ 0.0483	\$ 0.0406	(0.0077)		-15.9%
50-50			0.039213	0.030245	(0.0090)		-22.9%

Weight 0.33875
 Ad% 50.00%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.169375	\$ 0.235	\$ 0.0398	\$ 0.251	\$ 0.0425		
Editorial Weight	0.169375	\$ 0.203	\$ 0.0344	\$ 0.210	\$ 0.0356		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.0542		\$ 0.0751		
Zone 1/2							
Advertising Weight	0.169375	\$ 0.261	\$ 0.0442	\$ 0.279	\$ 0.0473		
Editorial Weight	0.169375	\$ 0.203	\$ 0.0344	\$ 0.232	\$ 0.0393		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.0786		\$ 0.0866		
Savings, Zone 1/2 to SCF			\$ 0.0244	\$ 0.0115	(0.0129)		-53.0%
SCF							
Advertising Weight	0.169375	\$ 0.214	\$ 0.0362	\$ 0.230	\$ 0.0390		
Editorial Weight	0.169375	\$ 0.203	\$ 0.0344	\$ 0.193	\$ 0.0327		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0406		\$ 0.0606		
Savings, ADC to SCF			\$ 0.0136	\$ 0.0144	0.0009		6.5%
Savings, Zone 1/2 to SCF			\$ 0.0380	\$ 0.0259	(0.0121)		-31.8%
50-50			0.031182	0.018687	(0.0125)		-40.1%

Weight 0.209
 Ad% 53.54%

ADC

	Units	RC2005		RC2006	
		Rates	Cost	Rates	Cost
Advertising Weight	0.111899	\$ 0.235	\$ 0.0263	\$ 0.251	\$ 0.0281
Editorial Weight	0.097101	\$ 0.203	\$ 0.0197	\$ 0.210	\$ 0.0204
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -
			\$ 0.0260		\$ 0.0455

Zone 1/2

Advertising Weight	0.111899	\$ 0.261	\$ 0.0292	\$ 0.279	\$ 0.0312
Editorial Weight	0.097101	\$ 0.203	\$ 0.0197	\$ 0.232	\$ 0.0225
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -
			\$ 0.0489		\$ 0.0537

Savings, Zone 1/2 to SCF \$ 0.0229 \$ 0.0083 (0.0146) -63.9%

SCF

Advertising Weight	0.111899	\$ 0.214	\$ 0.0239	\$ 0.230	\$ 0.0257
Editorial Weight	0.097101	\$ 0.203	\$ 0.0197	\$ 0.193	\$ 0.0187
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -
			\$ 0.0137		\$ 0.0335

Savings, ADC to SCF \$ 0.0123 \$ 0.0120 (0.0003) -2.8%

Savings, Zone 1/2 to SCF \$ 0.0353 \$ 0.0203 (0.0150) -42.5%

50-50 0.029084 0.01427 (0.0148) -50.9%

Weight 0.2924
 Ad% 62%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.182107	\$ 0.235	\$ 0.0428	\$ 0.251	\$ 0.0457		
Editorial Weight	0.110293	\$ 0.203	\$ 0.0224	\$ 0.210	\$ 0.0232		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.0452		\$ 0.0659		
Zone 1/2							
Advertising Weight	0.182107	\$ 0.261	\$ 0.0475	\$ 0.279	\$ 0.0508		
Editorial Weight	0.110293	\$ 0.203	\$ 0.0224	\$ 0.232	\$ 0.0256		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.0699		\$ 0.0764		
Savings, Zone 1/2 to SCF			\$ 0.0247	\$ 0.0105	(0.0142)		-57.4%
SCF							
Advertising Weight	0.182107	\$ 0.214	\$ 0.0390	\$ 0.230	\$ 0.0419		
Editorial Weight	0.110293	\$ 0.203	\$ 0.0224	\$ 0.193	\$ 0.0213		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0314		\$ 0.0522		
Savings, ADC to SCF			\$ 0.0138	\$ 0.0137	(0.0001)		-0.9%
Savings, Zone 1/2 to SCF			\$ 0.0386	\$ 0.0242	(0.0143)		-37.2%
50-50			0.031647	0.017375	(0.0143)		-45.1%

Weight 0.531
 Ad% 51.7%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.274527	\$ 0.235	\$ 0.0645	\$ 0.251	\$ 0.0689		
Editorial Weight	0.256473	\$ 0.203	\$ 0.0521	\$ 0.210	\$ 0.0539		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.0966		\$ 0.1198		
Zone 1/2							
Advertising Weight	0.274527	\$ 0.261	\$ 0.0717	\$ 0.279	\$ 0.0766		
Editorial Weight	0.256473	\$ 0.203	\$ 0.0521	\$ 0.232	\$ 0.0595		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1237		\$ 0.1361		
Savings, Zone 1/2 to SCF			\$ 0.0271	\$ 0.0163	(0.0108)		-39.8%
SCF							
Advertising Weight	0.274527	\$ 0.214	\$ 0.0587	\$ 0.230	\$ 0.0631		
Editorial Weight	0.256473	\$ 0.203	\$ 0.0521	\$ 0.193	\$ 0.0495		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.0808		\$ 0.1016		
Savings, ADC to SCF			\$ 0.0158	\$ 0.0181	0.0024		15.0%
Savings, Zone 1/2 to SCF			\$ 0.0429	\$ 0.0345	(0.0084)		-19.7%
50-50			0.03502	0.025392	(0.0096)		-27.5%

Weight 0.637
 Ad% 42.1%

ADC		RC2005		RC2006			
	Units	Rates	Cost	Rates	Cost		
Advertising Weight	0.268177	\$ 0.235	\$ 0.0630	\$ 0.251	\$ 0.0673		
Editorial Weight	0.368823	\$ 0.203	\$ 0.0749	\$ 0.210	\$ 0.0775		
Piece Discount	1	\$ (0.002)	\$(0.0020)	\$ (0.003)	\$(0.0030)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.007)	\$(0.0070)	\$ -	\$ -		
			\$ 0.1179		\$ 0.1418		
Zone 1/2							
Advertising Weight	0.268177	\$ 0.261	\$ 0.0700	\$ 0.279	\$ 0.0748		
Editorial Weight	0.368823	\$ 0.203	\$ 0.0749	\$ 0.232	\$ 0.0856		
Piece Discount	0	\$ (0.002)	\$ -	\$ (0.003)	\$ -		
Dropship Pallet	0	\$ (0.011)	\$ -	\$ -	\$ -		
Co-Pal	0	\$ (0.007)	\$ -	\$ -	\$ -		
			\$ 0.1449		\$ 0.1604		
Savings, Zone 1/2 to SCF			\$ 0.0270	\$ 0.0186	(0.0083)		-31.0%
SCF							
Advertising Weight	0.268177	\$ 0.214	\$ 0.0574	\$ 0.230	\$ 0.0617		
Editorial Weight	0.368823	\$ 0.203	\$ 0.0749	\$ 0.193	\$ 0.0712		
Piece Discount	1	\$ (0.008)	\$(0.0080)	\$ (0.011)	\$(0.0110)		
Dropship Pallet	1	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
Co-Pal	100%	\$ (0.011)	\$(0.0110)	\$ -	\$ -		
			\$ 0.1023		\$ 0.1219		
Savings, ADC to SCF			\$ 0.0156	\$ 0.0199	0.0043		27.3%
Savings, Zone 1/2 to SCF			\$ 0.0426	\$ 0.0385	(0.0041)		-9.6%
50-50			0.034788	0.028574	(0.0062)		-17.9%