

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes : Docket No. R2006-1
: :
:

RESPONSE OF TIME WARNER INC.
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 19
(November 2, 2006)

Time Warner Inc. (Time Warner) hereby provides the response of witness Halstein Stralberg (TW-T-2) to Presiding Officer's Information Request No. 19 (issued October 2, 2006).

Associated with the response provided herein is Library Reference TW-LR-6, which Time Warner expects to file tomorrow, November 3, under protective conditions.

POIR No. 19 is stated verbatim and followed by the response.

Respectfully submitted,

s/ _____
John M. Burzio
Timothy L. Keegan

COUNSEL FOR
TIME WARNER INC.

Burzio & McLaughlin
Canal Square, Suite 540
1054 31st Street, N. W.
Washington, D. C. 20007-4403
Telephone: (202) 965-4555
Fax: (202) 965-4432
E-mail: burziomclaughlin@covad.net

RESPONSE OF WITNESS HALSTEIN STRALBERG TO POIR NO. 19

POIR 19 The United States Postal Service; Magazine Publishers of America, Inc. and Alliance of Nonprofit Mailers; and Time Warner Inc. are requested to provide the information described below to assist in developing a record for the consideration of the Postal Service's request for changes in rates and fees. In order to facilitate inclusion of the required material in the evidentiary record, participants are to have a witness attest to the accuracy of the answers and be prepared to explain to the extent necessary the basis for the answers at our hearing. Answers from the Post Service are to be provided by October 16, 2006. Answers from Magazine Publishers of America, Inc. and Alliance of Nonprofit Mailers; and Time Warner Inc. are to be provided by October 23, 2006.

In this proceeding Postal Service witness Tang, Time Warner witness Mitchell, and MPA-ANM witness Glick have made Outside County rate proposals. The Commission seeks to develop as complete a record as possible concerning each of these Outside County rate proposals.

During the August 10, 2006, hearing the Presiding Officer requested that witness Tang provide any additional information concerning small publications developed since the conclusion of Docket No. C2004-1.¹ On August 17, 2006, witness Tang responded to the request by providing percentage increases resulting from her Outside County rate proposals for each of the 251 periodicals in her C2004-1 database.² On September 6, 2006, MPA-ANM filed MPA/ANM-LR-3, witness Tang's C2004-1 database, under protective conditions established in Presiding Officer's Ruling No. R2006-1/51.³

On September 21, 2006, Time Warner requested that witness Tang update her C2004-1 database to include data since the inception of the 24-piece sack minimum and calculate the percentage changes resulting from her Outside County rate proposal using the updated information. In addition, Time Warner requested that witness Tang calculate the changes resulting from the Outside County rate proposals of witnesses Mitchell and Glick and provide a comparison of current rates, her proposed rates, and the rates proposed by Time Warner witness Mitchell and MPA-ANM witness Glick.⁴ The Postal Service objected to this interrogatory on September 26, 2006.⁵ The objection focused, in part, on the burden involved in developing a new, representative sample.

The Commission requests that the Postal Service provide, under the protective conditions established in Presiding Officer's Ruling No. R2006-1/51, a version of MPA-ANM-LR-3

¹ Tr. 7/1883-87.

² Response of United States Postal Service Witness Tang to Question Posed by Chairman Omas at the August 10, 2006 Hearing, August 17, 2006.

³ Notice of Alliance of Nonprofit Mailers and Magazine Publishers of America, Inc., of Filing of Library Reference MPA/ANM-LR-3, Protected Material, September 6, 2006.

⁴ TW/USPS-T35-13.

⁵ Objection of the United States Postal Service to Interrogatories of Time Warner Inc. to Postal Service Witness Tang (TW/USPS-T35-11-13), September 26, 2006.

composed of data from as many of the same 251 publications as are currently mailing. This new data should reflect mailings sent after the 24-piece sack minimum became effective.⁶

The Commission further requests that the Postal Service provide a table comparing the percentage changes from current postage to its Outside County rate proposals based on these new, more recent mailings.

After the Postal Service provides more recent data on the 251 publications, the Commission requests that Time Warner and MPA-ANM provide calculations of the percentage changes of their respective proposals on the 251 publications using these more recent data.

Response:

The latest version of the Postal Service's response to POIR No. 19 was filed under protective conditions, as LR-L-189 Revised, on October 31. It contains data on 259 publications, including 87 identified as "RPL," indicating replacements of the originally sampled publications used by witness Tang in Docket No. C2004-1. I will refer to them simply by publication number, i.e., publication 1 through 259.⁷

Table 2 at the end of this response provides my estimates of the per-piece postage each of the publications, assuming no change in mail piece characteristics or mail preparation, would pay under the rates proposed by Time Warner witness Mitchell, and compares those rates with current rates and the rates proposed by witness Tang.

The Time Warner rate proposal recognizes flats machinability as a major cost driver, while current rates and the alternative rates proposed in this docket do not. As a result, flats machinability has a major impact on the comparison between Time Warner's proposed rates and other rate proposals. Table 2 shows which publications are identified as machinable in LR-L-189.⁸

⁶ If more recent data for any of the 251 publications is not available, the Postal Service may substitute data for a similar publication.

⁷ The numbering scheme I use is the same as that used by witness Glick in his response on behalf of MPA/ANM. It can also be described as follows, referring to the final version of the spreadsheet contained in LR-L-89. Publications No 1 through 158 are those identified in rows 10 through 167 on worksheet 'eVS,' and publications 159 through 259 are those in rows 10 through 110 on worksheet 'Sample.'

⁸ Some publications are shown as containing both machinable and non-machinable mail pieces. In those cases, I show a publication as machinable if at least half of its pieces are machinable.

The publications in LR-L-189 are shown as belonging to three different strata based on circulation size, where those with mailed circulation over 100,000 are called large (LG), those with circulation between 15,000 and 100,000 are called medium (MD) and those with less than 15,000 in mailed circulation are called small (SM). This corresponds to the original size stratification used by Tang in C2004-1. Towards the end of that docket, however, Tang was asked by the presiding officer to provide additional information about the smallest publications, those with circulation much smaller than 15,000. The information provided in response to that request revealed that over 15,000 publications, more than half of all registered Periodicals, have circulation size under 1,000, and that the median circulation size among those is only 224.⁹

Because of the large number of such very small publications, and the Commission's expressed concern about the impact of any rate proposal on such publications, I have identified, in Table 2, the 42 publications with circulation size below 1,000 as belonging to a separate size stratum, labeled VS (very small).

Since the Time Warner proposal identifies several new cost drivers not previously used in Periodicals rate design, it was to be expected that it would result in somewhat wider differences in percent increases among publications, relative to current rates, than the more conventional rate proposal presented by Tang. While the impact on most publications of Time Warner's rate proposal differs only by a few percentage points from the impact of Tang's rates, for some the difference is considerably greater.

Table 1 below summarizes the comparison of the impact of Tang's and Time Warner's rate proposals on publications in LR-L-189 by size and machinability category. Overall, Tang's proposal would lead to the larger percent increase for 98 and Time Warner's for 161 of those publications.

⁹ See Docket No. C2004-1, Response of Time Warner Inc. Et Al. to Notice of Inquiry No. 1 ("Comments of Time Warner Inc. Et Al. Witness Halstein Stralberg on the Characteristics of Very Small Periodicals"), filed December 8, 2004, at 1.

Table 1: Summary Comparison Of Impact Of Alternative Rate Schedules On Sampled Publications				
Size (Mailed circulation)	Machinable?	Largest Increase?		Total
		Tang	TW	
LG (>100K)	Yes	24	22	46
	No	1	5	6
MD (>15K, <100k)	Yes	26	46	72
	No	2	26	28
SM (>1K, <15K)	Yes	18	36	54
	No	1	10	11
VS (<1K)	Yes	26	4	30
	No	0	12	12
Total:		98	161	259

Among the categories of publications identified in Table 1, it appears that very small publications (circulation below 1,000) that are machinable would fare considerably better under Time Warner's rates than under those proposed by Tang. As the table shows, 26 of the 30 machinable very small publications in LR-L-189 would do better under the TW rates, only four would do worse. For a few of the 26, postage would even decrease under the TW proposal. For those that are non-machinable, on the other hand, postage would increase more, in some cases much more, under the TW proposal.

In LR-L-189, twelve of the 42 very small publications, or 28.6%, are identified as non-machinable. However, this percentage is not likely to reflect accurately the characteristics of very small publications. Based on data from the more comprehensive survey described in LR-L-91, particularly the data provided by witness Loetscher in response to Time Warner interrogatories, it can be determined that only about six or seven percent of publications with circulation under 1,000 are non-machinable.¹⁰ It therefore appears that a large majority of very small publications in fact would do better under Time Warner's proposed rates.

¹⁰ See Table 11 in witness Loetscher's response to TW/USPS-T28-11 (Tr. 7/1519).

LR-L-189 identifies 85 of the publications as being “comailed.” It identifies none of them as co-palletized. I suspect, however, that many of the publications identified as comailed are in fact only co-palletized. For this reason I did not attempt to use LR-L-189 as a basis for analyzing the different impact on comailed and other publications of the two rate proposals.¹¹

The calculations I used to derive the results presented in Tables 1 and 2 are included in Time Warner library reference 6, which is a modified version of the spreadsheet contained in USPS LR-L-189.

¹¹ Some of the publications identified as “comailed” are also identified as non-machinable. A comailer is a machine. While it is possible that some such machines could be able to process publications that are not machinable on AFSM-100 flats sorting machines, I am not aware of the existence of any. Time Warner is awaiting answers from the Postal Service to interrogatories dealing with the subjects of machinability and comailing that it is hoped will bring more clarity to this issue.

Table 2: Per-Piece Postage & Rate Increases For LR-L-189 Periodicals Under Alternative Rate Proposals

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
1	LG	M	\$0.3571	\$0.3890	\$0.3830	8.92%	7.25%
2	LG	M	\$0.1750	\$0.1980	\$0.1839	13.15%	5.07%
3	LG	M	\$0.2865	\$0.3008	\$0.2979	4.99%	3.97%
4	LG	NM	\$0.3022	\$0.3248	\$0.3180	7.49%	5.24%
5	LG	M	\$0.2298	\$0.2555	\$0.2472	11.18%	7.60%
6	LG	M	\$0.2927	\$0.3195	\$0.3085	9.16%	5.42%
7	LG	M	\$0.3446	\$0.3756	\$0.3725	8.98%	8.08%
8	LG	M	\$0.2647	\$0.2900	\$0.2796	9.57%	5.64%
9	LG	NM	\$0.4616	\$0.4985	\$0.5119	7.98%	10.90%
10	LG	M	\$0.2663	\$0.2896	\$0.2894	8.77%	8.68%
11	LG	M	\$0.2524	\$0.2783	\$0.2661	10.26%	5.43%
12	LG	M	\$0.4208	\$0.4531	\$0.4690	7.69%	11.47%
13	LG	M	\$0.1447	\$0.1634	\$0.1516	12.90%	4.72%
14	LG	M	\$0.2570	\$0.2827	\$0.2714	9.99%	5.60%
15	LG	M	\$0.2723	\$0.3041	\$0.3118	11.68%	14.50%
16	LG	M	\$0.1985	\$0.2243	\$0.2201	13.01%	10.91%
17	LG	M	\$0.3407	\$0.3737	\$0.3806	9.68%	11.71%
18	LG	M	\$0.2451	\$0.2706	\$0.2670	10.41%	8.94%
19	LG	M	\$0.2061	\$0.2287	\$0.2146	10.98%	4.12%
20	LG	M	\$0.2833	\$0.3108	\$0.3140	9.70%	10.83%
21	LG	M	\$0.5709	\$0.6109	\$0.6120	7.00%	7.21%
22	LG	M	\$0.1331	\$0.1588	\$0.1365	19.30%	2.50%
23	LG	NM	\$0.4207	\$0.4618	\$0.4960	9.77%	17.91%
24	LG	M	\$0.3341	\$0.3674	\$0.3719	9.98%	11.31%
25	LG	M	\$0.2640	\$0.2923	\$0.2989	10.73%	13.24%
26	LG	M	\$0.1588	\$0.1820	\$0.1608	14.56%	1.25%
27	LG	M	\$0.4581	\$0.4952	\$0.5188	8.08%	13.24%
28	LG	M	\$0.2770	\$0.3065	\$0.3129	10.65%	12.96%
29	LG	M	\$0.2407	\$0.2673	\$0.2683	11.03%	11.45%
30	LG	M	\$0.3060	\$0.3340	\$0.3219	9.17%	5.20%
31	LG	NM	\$0.5879	\$0.6344	\$0.6769	7.91%	15.15%
32	LG	M	\$0.2314	\$0.2561	\$0.2555	10.65%	10.40%
33	LG	M	\$0.2680	\$0.2965	\$0.2942	10.63%	9.78%
34	LG	M	\$0.1732	\$0.1959	\$0.1905	13.10%	9.96%
35	LG	M	\$0.2967	\$0.3265	\$0.3316	10.04%	11.75%
36	LG	M	\$0.1992	\$0.2215	\$0.2290	11.19%	14.96%
37	LG	M	\$0.2356	\$0.2592	\$0.2437	9.98%	3.44%
38	LG	M	\$0.2245	\$0.2422	\$0.2445	7.88%	8.92%
39	LG	NM	\$0.2720	\$0.3005	\$0.3361	10.48%	23.58%
40	LG	M	\$0.3341	\$0.3779	\$0.3926	13.10%	17.49%
41	LG	NM	\$0.4622	\$0.5246	\$0.5614	13.51%	21.45%
42	LG	M	\$0.2430	\$0.2662	\$0.2542	9.54%	4.59%
43	LG	M	\$0.3716	\$0.4196	\$0.4213	12.93%	13.37%

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
44	LG	M	\$0.2713	\$0.2989	\$0.3092	10.19%	13.97%
45	LG	M	\$0.2597	\$0.2836	\$0.2850	9.20%	9.72%
46	LG	M	\$0.9163	\$1.0490	\$1.1123	14.48%	21.39%
47	LG	M	\$0.2463	\$0.2705	\$0.2558	9.85%	3.87%
48	LG	M	\$0.2168	\$0.2408	\$0.2372	11.08%	9.42%
49	LG	M	\$0.2465	\$0.2758	\$0.2822	11.91%	14.48%
50	LG	M	\$0.4307	\$0.4851	\$0.4893	12.64%	13.62%
51	LG	M	\$0.2575	\$0.2852	\$0.2865	10.75%	11.24%
52	LG	M	\$0.2686	\$0.2960	\$0.2979	10.21%	10.92%
53	MD	NM	\$0.4561	\$0.4964	\$0.5509	8.84%	20.80%
54	MD	M	\$0.2544	\$0.2794	\$0.2738	9.83%	7.64%
55	MD	NM	\$0.5515	\$0.6143	\$0.6625	11.37%	20.12%
56	MD	M	\$0.2525	\$0.2792	\$0.2783	10.60%	10.23%
57	MD	M	\$0.2973	\$0.3303	\$0.3403	11.12%	14.47%
58	MD	M	\$0.2606	\$0.2855	\$0.2724	9.55%	4.50%
59	MD	M	\$0.3860	\$0.4155	\$0.4171	7.64%	8.03%
60	MD	M	\$0.2353	\$0.2654	\$0.2779	12.76%	18.06%
61	MD	M	\$0.2585	\$0.2871	\$0.2839	11.06%	9.85%
62	MD	M	\$0.4116	\$0.4605	\$0.4718	11.89%	14.64%
63	MD	NM	\$0.2182	\$0.2466	\$0.3215	12.99%	47.32%
64	MD	M	\$0.4205	\$0.4515	\$0.4470	7.38%	6.31%
65	MD	NM	\$0.4046	\$0.4534	\$0.5159	12.05%	27.50%
66	MD	M	\$0.1763	\$0.2005	\$0.1904	13.74%	8.03%
67	MD	NM	\$0.3196	\$0.3525	\$0.3882	10.28%	21.45%
68	MD	NM	\$0.1974	\$0.2223	\$0.2211	12.64%	12.02%
69	MD	NM	\$0.2154	\$0.2378	\$0.2463	10.42%	14.36%
70	MD	M	\$0.2170	\$0.2453	\$0.2548	13.01%	17.41%
71	MD	M	\$0.2470	\$0.2719	\$0.2691	10.07%	8.94%
72	MD	M	\$0.2290	\$0.2496	\$0.2509	8.98%	9.57%
73	MD	M	\$0.4431	\$0.4914	\$0.4920	10.89%	11.04%
74	MD	M	\$0.5569	\$0.6030	\$0.6085	8.27%	9.26%
75	MD	NM	\$0.2760	\$0.3086	\$0.3512	11.82%	27.26%
76	MD	M	\$0.1941	\$0.2115	\$0.2119	8.93%	9.18%
77	MD	M	\$0.2027	\$0.2217	\$0.2235	9.38%	10.26%
78	MD	M	\$0.2255	\$0.2496	\$0.2484	10.68%	10.13%
79	MD	NM	\$0.2850	\$0.3162	\$0.3580	10.94%	25.59%
80	MD	M	\$0.2806	\$0.3126	\$0.3182	11.42%	13.41%
81	MD	M	\$0.2342	\$0.2606	\$0.2582	11.26%	10.23%
82	MD	M	\$0.2292	\$0.2521	\$0.2543	9.99%	10.97%
83	MD	M	\$0.4397	\$0.4722	\$0.4699	7.39%	6.87%
84	MD	NM	\$0.6428	\$0.7321	\$0.8047	13.90%	25.19%
85	MD	M	\$0.2834	\$0.3200	\$0.3320	12.92%	17.16%
86	MD	NM	\$0.2867	\$0.3181	\$0.3541	10.95%	23.52%
87	MD	M	\$0.2489	\$0.2717	\$0.2689	9.17%	8.03%
88	MD	NM	\$0.2877	\$0.3161	\$0.3512	9.89%	22.09%
89	MD	M	\$0.2309	\$0.2638	\$0.2796	14.20%	21.05%
90	MD	NM	\$0.2560	\$0.2848	\$0.3120	11.26%	21.89%
91	MD	M	\$0.2363	\$0.2623	\$0.2610	10.99%	10.45%

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
92	MD	NM	\$0.5119	\$0.6044	\$0.6715	18.06%	31.17%
93	MD	M	\$0.2186	\$0.2451	\$0.2424	12.14%	10.89%
94	MD	M	\$0.2316	\$0.2577	\$0.2565	11.27%	10.75%
95	MD	M	\$0.2296	\$0.2563	\$0.2537	11.65%	10.49%
96	MD	M	\$0.2277	\$0.2526	\$0.2503	10.94%	9.91%
97	MD	M	\$0.4341	\$0.4952	\$0.5011	14.08%	15.44%
98	MD	M	\$0.4731	\$0.5370	\$0.5486	13.50%	15.96%
99	MD	M	\$0.2220	\$0.2471	\$0.2451	11.27%	10.38%
100	MD	M	\$0.2691	\$0.3036	\$0.3167	12.83%	17.70%
101	MD	NM	\$0.2773	\$0.3073	\$0.3474	10.83%	25.28%
102	MD	NM	\$0.4184	\$0.4788	\$0.5469	14.43%	30.70%
103	MD	M	\$0.4783	\$0.5355	\$0.5379	11.96%	12.46%
104	MD	M	\$0.2514	\$0.2781	\$0.2788	10.60%	10.88%
105	MD	NM	\$0.6452	\$0.7100	\$0.7814	10.05%	21.11%
106	MD	NM	\$0.2733	\$0.3017	\$0.3351	10.41%	22.63%
107	MD	M	\$0.3014	\$0.3441	\$0.3538	14.18%	17.39%
108	MD	M	\$0.4040	\$0.4594	\$0.4731	13.70%	17.09%
109	MD	M	\$0.2461	\$0.2720	\$0.2713	10.54%	10.26%
110	MD	NM	\$0.3605	\$0.4142	\$0.5052	14.91%	40.15%
111	MD	M	\$0.2424	\$0.2664	\$0.2688	9.88%	10.89%
112	MD	M	\$0.3246	\$0.3656	\$0.3791	12.64%	16.81%
113	MD	M	\$0.2261	\$0.2507	\$0.2508	10.88%	10.93%
114	MD	NM	\$0.6560	\$0.7312	\$0.8187	11.47%	24.81%
115	MD	NM	\$0.4067	\$0.4682	\$0.4413	15.12%	8.51%
116	MD	NM	\$0.2793	\$0.3101	\$0.3562	11.03%	27.54%
117	MD	M	\$0.2365	\$0.2620	\$0.2651	10.74%	12.06%
118	MD	M	\$0.2527	\$0.2792	\$0.2816	10.45%	11.42%
119	MD	NM	\$0.2786	\$0.3098	\$0.3582	11.21%	28.57%
120	MD	NM	\$0.4058	\$0.4680	\$0.5678	15.34%	39.93%
121	MD	NM	\$0.3595	\$0.4196	\$0.5267	16.70%	46.49%
122	MD	M	\$0.2568	\$0.2844	\$0.2905	10.75%	13.11%
123	MD	NM	\$0.4253	\$0.4870	\$0.5782	14.51%	35.94%
124	MD	M	\$0.2316	\$0.2585	\$0.2556	11.62%	10.35%
125	MD	M	\$0.2565	\$0.2839	\$0.2863	10.66%	11.60%
126	MD	M	\$0.3820	\$0.4419	\$0.4545	15.70%	18.99%
127	MD	M	\$0.2751	\$0.3139	\$0.3333	14.11%	21.14%
128	MD	M	\$0.3436	\$0.3938	\$0.4105	14.61%	19.45%
129	MD	M	\$0.2797	\$0.3251	\$0.3460	16.24%	23.72%
130	MD	NM	\$0.4926	\$0.5487	\$0.5685	11.39%	15.41%
131	MD	M	\$0.2531	\$0.2799	\$0.2828	10.60%	11.74%
132	MD	M	\$0.2404	\$0.2678	\$0.2661	11.40%	10.68%
133	MD	M	\$0.2312	\$0.2558	\$0.2578	10.63%	11.49%
134	MD	M	\$0.3258	\$0.3752	\$0.3950	15.17%	21.25%
135	MD	M	\$0.2759	\$0.3052	\$0.3071	10.62%	11.31%
136	MD	M	\$0.1821	\$0.2016	\$0.2057	10.69%	12.93%
137	MD	M	\$0.2696	\$0.2968	\$0.3042	10.11%	12.83%
138	MD	M	\$0.4745	\$0.5407	\$0.5519	13.94%	16.30%
139	MD	M	\$0.2544	\$0.2813	\$0.2785	10.57%	9.46%

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
140	MD	M	\$0.2302	\$0.2560	\$0.2522	11.23%	9.58%
141	MD	M	\$0.2686	\$0.2960	\$0.2979	10.22%	10.93%
142	MD	M	\$0.2674	\$0.2940	\$0.2995	9.94%	11.97%
143	MD	M	\$0.2255	\$0.2525	\$0.2503	11.94%	10.97%
144	MD	M	\$0.2474	\$0.2732	\$0.2703	10.41%	9.23%
145	MD	M	\$0.2448	\$0.2679	\$0.2655	9.42%	8.43%
146	MD	M	\$0.2372	\$0.2624	\$0.2639	10.64%	11.28%
147	MD	M	\$0.2224	\$0.2474	\$0.2447	11.26%	10.07%
148	MD	M	\$0.2237	\$0.2432	\$0.2457	8.69%	9.81%
149	MD	M	\$0.3510	\$0.3854	\$0.3979	9.81%	13.37%
150	MD	M	\$0.2550	\$0.2820	\$0.2844	10.58%	11.53%
151	MD	M	\$0.2613	\$0.2867	\$0.2937	9.71%	12.39%
152	MD	NM	\$0.3332	\$0.3814	\$0.4651	14.44%	39.58%
153	SM	M	\$0.2460	\$0.2659	\$0.2634	8.13%	7.08%
154	SM	M	\$0.3769	\$0.4373	\$0.3997	16.01%	6.04%
155	SM	M	\$0.4214	\$0.4932	\$0.4531	17.05%	7.52%
156	SM	M	\$0.2999	\$0.3566	\$0.3812	18.90%	27.11%
157	SM	M	\$0.4095	\$0.4665	\$0.4695	13.91%	14.65%
158	SM	NM	\$0.6645	\$0.7529	\$0.7869	13.30%	18.42%
159	SM	M	\$0.2808	\$0.3129	\$0.2925	11.45%	4.20%
160	SM	M	\$0.2263	\$0.2526	\$0.2507	11.62%	10.79%
161	SM	M	\$0.3361	\$0.3881	\$0.4065	15.48%	20.95%
162	SM	M	\$0.1751	\$0.1992	\$0.1936	13.75%	10.53%
163	SM	M	\$0.3311	\$0.3830	\$0.4019	15.67%	21.38%
164	SM	M	\$0.2157	\$0.2412	\$0.2369	11.79%	9.83%
165	SM	M	\$0.2142	\$0.2420	\$0.2548	13.00%	18.97%
166	SM	M	\$0.3237	\$0.3792	\$0.3939	17.14%	21.69%
167	SM	NM	\$0.6914	\$0.8003	\$0.8931	15.74%	29.18%
168	SM	M	\$0.1462	\$0.1641	\$0.1591	12.22%	8.82%
169	SM	NM	\$0.7171	\$0.8373	\$0.9898	16.76%	38.03%
170	SM	M	\$0.2329	\$0.2668	\$0.2663	14.53%	14.33%
171	SM	M	\$0.3663	\$0.4426	\$0.4650	20.84%	26.94%
172	SM	M	\$0.2790	\$0.3229	\$0.3452	15.75%	23.72%
173	SM	M	\$0.1696	\$0.1924	\$0.2121	13.44%	25.07%
174	SM	M	\$0.2420	\$0.2730	\$0.2737	12.82%	13.09%
175	SM	M	\$0.2518	\$0.2861	\$0.3044	13.64%	20.89%
176	SM	M	\$0.1958	\$0.2253	\$0.2375	15.05%	21.26%
177	SM	NM	\$0.7049	\$0.7971	\$0.8378	13.08%	18.85%
178	SM	M	\$0.1835	\$0.1992	\$0.1964	8.55%	7.03%
179	SM	M	\$0.3022	\$0.3534	\$0.3634	16.95%	20.27%
180	SM	NM	\$0.5298	\$0.5782	\$0.5433	9.15%	2.56%
181	SM	NM	\$0.6094	\$0.7322	\$0.7898	20.14%	29.60%
182	SM	M	\$0.2183	\$0.2349	\$0.2209	7.62%	1.18%
183	SM	M	\$0.3714	\$0.4336	\$0.4301	16.75%	15.83%
184	SM	M	\$0.2162	\$0.2476	\$0.2757	14.50%	27.48%
185	SM	M	\$0.2536	\$0.2948	\$0.2959	16.24%	16.68%
186	SM	M	\$0.2638	\$0.3008	\$0.3225	14.02%	22.22%
187	SM	M	\$0.2400	\$0.2718	\$0.2782	13.26%	15.89%

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
188	SM	M	\$0.2313	\$0.2785	\$0.3176	20.39%	37.29%
189	SM	NM	\$0.3110	\$0.3548	\$0.4109	14.09%	32.14%
190	SM	M	\$0.4226	\$0.4861	\$0.4583	15.03%	8.46%
191	SM	M	\$0.2738	\$0.3183	\$0.3314	16.25%	21.04%
192	SM	M	\$0.2709	\$0.3126	\$0.3340	15.38%	23.31%
193	SM	M	\$0.2996	\$0.3538	\$0.3564	18.10%	18.96%
194	VS	M	\$0.2387	\$0.2790	\$0.3134	16.84%	31.27%
195	VS	M	\$0.4422	\$0.5030	\$0.4538	13.75%	2.62%
196	VS	NM	\$0.3033	\$0.3597	\$0.4401	18.58%	45.10%
197	VS	M	\$0.4118	\$0.4807	\$0.5157	16.73%	25.22%
198	VS	M	\$0.3046	\$0.3451	\$0.2813	13.30%	-7.63%
199	VS	NM	\$0.6878	\$0.8308	\$0.9638	20.80%	40.14%
200	VS	M	\$0.3300	\$0.3699	\$0.3308	12.10%	0.24%
201	VS	M	\$0.2503	\$0.2969	\$0.3253	18.62%	29.99%
202	VS	NM	\$0.3489	\$0.4008	\$0.4634	14.88%	32.80%
203	VS	M	\$0.2950	\$0.3378	\$0.3307	14.53%	12.12%
204	VS	NM	\$0.2162	\$0.2566	\$0.3087	18.69%	42.80%
205	VS	NM	\$0.3671	\$0.4388	\$0.5840	19.52%	59.08%
206	VS	M	\$0.3712	\$0.4429	\$0.4036	19.33%	8.74%
207	VS	NM	\$0.3037	\$0.3531	\$0.4001	16.26%	31.71%
208	VS	NM	\$0.3246	\$0.3808	\$0.4453	17.33%	37.21%
209	VS	M	\$0.2869	\$0.3705	\$0.3577	29.14%	24.67%
210	VS	NM	\$0.3359	\$0.3980	\$0.4660	18.50%	38.73%
211	SM	M	\$0.2565	\$0.2985	\$0.3198	16.36%	24.70%
212	SM	M	\$0.4068	\$0.4642	\$0.4735	14.12%	16.40%
213	SM	M	\$0.2964	\$0.3421	\$0.3608	15.42%	21.71%
214	SM	M	\$0.2836	\$0.3290	\$0.3386	16.02%	19.41%
215	SM	M	\$0.6218	\$0.7043	\$0.6813	13.28%	9.58%
216	SM	M	\$0.4154	\$0.4846	\$0.5027	16.67%	21.02%
217	SM	M	\$0.4252	\$0.4905	\$0.5008	15.38%	17.78%
218	SM	M	\$0.3361	\$0.3924	\$0.4073	16.75%	21.21%
219	SM	M	\$0.4368	\$0.5096	\$0.5185	16.68%	18.71%
220	SM	M	\$0.2886	\$0.3366	\$0.3559	16.61%	23.33%
221	SM	M	\$0.4023	\$0.4640	\$0.4748	15.34%	18.03%
222	SM	M	\$0.8377	\$0.9434	\$0.9222	12.62%	10.08%
223	SM	M	\$0.3086	\$0.3458	\$0.3521	12.07%	14.10%
224	SM	M	\$0.4566	\$0.5166	\$0.5136	13.14%	12.48%
225	SM	M	\$0.3374	\$0.3940	\$0.4042	16.78%	19.80%
226	SM	M	\$0.2972	\$0.3509	\$0.3576	18.08%	20.32%
227	SM	M	\$0.3953	\$0.4574	\$0.4468	15.70%	13.01%
228	SM	NM	\$0.7731	\$0.9208	\$0.9663	19.11%	24.99%
229	SM	NM	\$0.5194	\$0.6121	\$0.7031	17.86%	35.38%
230	SM	M	\$0.3547	\$0.4145	\$0.4211	16.86%	18.74%
231	SM	M	\$0.2565	\$0.3040	\$0.3159	18.54%	23.15%
232	SM	M	\$0.3145	\$0.3706	\$0.3640	17.85%	15.74%
233	SM	NM	\$0.5883	\$0.6865	\$0.7431	16.69%	26.32%
234	SM	NM	\$0.5931	\$0.6914	\$0.7523	16.57%	26.85%
235	VS	M	\$0.2550	\$0.2974	\$0.2959	16.61%	16.03%

Publication Number	Size	Machin-able?	Postage/Piece			Percent Increase	
			R2005-1	Tang	Mitchell	Tang	Mitchell
236	VS	M	\$0.3068	\$0.3544	\$0.3369	15.53%	9.84%
237	VS	M	\$0.3529	\$0.3997	\$0.3487	13.28%	-1.19%
238	VS	M	\$0.5202	\$0.5782	\$0.5218	11.14%	0.30%
239	VS	M	\$0.3689	\$0.4178	\$0.3839	13.25%	4.07%
240	VS	M	\$0.3526	\$0.3963	\$0.3545	12.39%	0.55%
241	VS	NM	\$0.3823	\$0.4438	\$0.5049	16.11%	32.08%
242	VS	M	\$0.5469	\$0.6254	\$0.5738	14.34%	4.90%
243	VS	M	\$0.6337	\$0.7101	\$0.6455	12.06%	1.87%
244	VS	M	\$0.3880	\$0.4420	\$0.3684	13.93%	-5.04%
245	VS	M	\$0.3540	\$0.3968	\$0.3710	12.10%	4.79%
246	VS	M	\$0.4554	\$0.5192	\$0.4663	14.00%	2.39%
247	VS	M	\$0.3998	\$0.4642	\$0.4115	16.12%	2.93%
248	VS	M	\$0.3617	\$0.4232	\$0.3777	17.01%	4.41%
249	VS	M	\$0.3671	\$0.4329	\$0.4018	17.92%	9.46%
250	VS	M	\$0.4156	\$0.4819	\$0.4230	15.94%	1.77%
251	VS	M	\$0.4219	\$0.4893	\$0.4597	15.97%	8.96%
252	VS	NM	\$0.4379	\$0.5100	\$0.6249	16.45%	42.69%
253	VS	M	\$0.2426	\$0.3077	\$0.2953	26.83%	21.70%
254	VS	M	\$0.4388	\$0.5203	\$0.4962	18.57%	13.08%
255	VS	NM	\$0.5172	\$0.6164	\$0.7404	19.18%	43.16%
256	VS	M	\$0.4961	\$0.6037	\$0.5878	21.68%	18.49%
257	VS	NM	\$0.5927	\$0.7002	\$0.7617	18.14%	28.52%
258	VS	M	\$0.4528	\$0.6508	\$0.6645	43.73%	46.76%
259	VS	M	\$0.3130	\$0.3867	\$0.3118	23.54%	-0.41%