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

NOTICE OF PRICE ADJUSTMENT	Docket No. R2008-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO COMMISSION INFORMATION REQUEST NO. 1
(March 4, 2008)

On February 26, 2008, the Commission issued Information Request No. 1 in the above-referenced docket, requesting certain additional information concerning the discussion of worksharing passthroughs in the Postal Service's Notice of Market-Dominant Price Adjustment. The Postal Service hereby provides its response. Each question is repeated verbatim and is followed by the response.

<u>QUESTION 1</u>

The Postal Service justifies the passthrough of more than 100 percent of avoided costs for First-Class 5-digit automation presort letters "on the basis that it is necessary to induce mailer behavior that furthers the economically efficient operation of the Postal Service through an incentive to create more efficiently-handled mailings." Notice at 26-27. This mirrors the language of 39 U.S.C. 3622(e)(2)(A)(ii), which covers a discount that is "necessary to induce mailer behavior that furthers the economically efficient operation of the Postal Service . . . ."

The discussions of Standard Mail Automation Mixed AADC letters (*id.* at 28), Automation Mixed ADC flats (*id.* at 29), pre-barcoding discount for parcels and not-flat machinables (NFMs) (*id.* at 33), and machinable parcels presort discounts and destination delivery units (DDU) dropship discounts for parcels and NFMs (*id.* at 32) each contain similar assertions about encouraging mailer behavior that will further the economically efficient operation of the Postal Service, as does the discussion of the discount for Bound Printed Matter (BPM) parcels dropshipped to DDU (*id.* at 35-36).

a. Assuming that the above-referenced portions of the Notice are identifying 39 U.S.C. 3622(e)(2)(A) as the justification for the First-Class, Standard Mail, and BPM DDU parcels discounts with passthroughs exceeding 100 percent, please provide, for each such discount, an explanation of how it conforms to the other parts of 39 U.S.C. 3622(e)(2)(A), including subpart (i) identifying the discount as “associated with a new postal service, a change to an existing postal service, or with a new work share initiative related to an existing postal service[,]” and the second aspect of subpart (ii), which anticipates a phase out of the excess discount “over a limited period of time[.]”

If the quoted language of the Notice is not referring to 39 U.S.C. 3622(e)(2)(A), then for each of the worksharing discounts in First-Class and Standard Mail with a passthrough in excess of 100 percent, please identify the specific exception in 39 U.S.C. 3622(e)(2) or (3) that the Postal Service is invoking to justify, and explain why the planned discount fits the exception.

b. The discussion of the BPM parcel DDU dropship discount also states that “the reduction of the discount would impede the efficient operation of the Postal Service.” *Id*. at 36. Assuming that this is identifying 39 U.S.C. 3622(e)(2)(D) as a justification for the BPM parcels DDU dropship passthrough exceeding 100 percent, please explain how 39 U.S.C. 3622(e)(2)(D), which refers to the effects of *reducing* or *eliminating* a discount, justifies *increasing* the BPM parcels DDU dropship discount.

If the quoted language of the Notice is not referring to 39 U.S.C. 3622(e)(2)(D), please identify the specific exception in 39 U.S.C. 3622(e)(2) or (3) that the Postal Service is invoking to justify a BPM parcels DDU dropship passthrough in excess of 100 percent, and explain why the planned discount fits the exception.

c. For each discount identified in the preamble, please explain the analytical process used to arrive at the conclusion that setting it in excess of the avoided cost “is necessary to induce mailer behavior that furthers the economically efficient operation of the Postal Service . . . .” *Id*. at 26-27. Include a discussion of how the Postal Service defines “economically efficient operation” and provide the calculations used to arrive at this conclusion, citing all sources and explaining all assumptions.

d. The discussion of machinable parcels presort discounts and DDU dropship discounts for parcels and NFMs (*id*. at 32-33) suggests that the estimated cost avoidances understate the true cost avoidances. Please explain the basis for this conclusion, and to the extent possible, quantify the understatement.

RESPONSE:

(a) The Postal Service was referring to section 3622(e)(2)(D) with respect to the discounts referenced by the Commission, rather than section 3622(e)(2)(A). In other words, the Postal Service believes that any reduction in the discounts from what it has presented in its Notice "would impede the efficient operation of the Postal Service." The Postal Service recognizes that its Notice was ambiguous as to which part of section 3622(e) was being referenced, and will be clearer in that regard in future filings. For a discussion of why the passthroughs are supported by subpart (D), please refer to the responses to Questions 1.b and 1.c below.

(b) Section 3622(e)(2)(D) is, by its plain terms, directed to the Commission, and tells the Commission that it need not "ensure" that a discount does not "exceed the cost that the Postal Service avoids as a result of the worksharing activity," if "reduction or elimination of the discount would impede the efficient operation of the Postal Service." Section 3622(e) is thus directed to the *review* by the Commission of the discounts set by the Postal Service pursuant to its business judgment. In other words, the proper focus for purposes of section 3622(e)(2)(D) is not on whether the Postal Service has increased a discount from what it was previously, but on whether reducing the discount that is planned by the Postal Service would "impede" the Postal Service's "efficient operation."[1] It is therefore entirely consistent with the language and structure of the Act for the Postal Service to increase a discount if it believes that doing so is necessary to improve efficiency, and to then reference section 3622(e)(2)(D) as a reason why the Commission should conclude that the greater-than-100-percent passthrough is justifiable.

[1] DMA and PostCom make the same point in the joint Comments they filed yesterday. *See* Direct Marketing Association, Inc. Association for Postal Commerce Comments on USPS Notice of Market-Dominant Price Adjustment, at 2.

For a discussion of the Postal Service's rationale behind the BPM DDU parcel dropship discount referenced in this Question, see the response to Question 1.c below.

(c) Each differential referenced in this Question is addressed separately below. It should be noted that this question refers to the language in subsection 3622(e)(2)(A), which, as is clarified in the response to Question 1.a above, is the result of imprecision in the Postal Service's Notice. In this response, the Postal Service discusses why any action by the Commission to reduce the discounts presented by the Postal Service would "impede the efficient operation of the Postal Service" within the meaning of section 3622(e)(2)(D), and would otherwise be inappropriate.

This exercise brings into focus several interrelated considerations that apply as the Postal Service designs workshare discounts, and that should apply as the Commission reviews those discounts pursuant to section 3622(e). First, the pricing exercise is as much the design of relationships as it is the design of individual prices. Discounts (and their concomitant passthroughs) cannot be considered in isolation. Customers make business decisions and investments based on price relationships. Furthermore, Postal Service operations are predicated on understanding and anticipating mailer incentives. Thus, the principle of "predictable and stable" prices, one of the paramount goals of the Act, is a very important component of efficiency, when viewed not simply from the perspective of any one individual price, but from the perspective of the relationships between prices within categories of mail, and across categories of mail. Changing the relationships year-to-year to follow the latest cost measurements could have two unfortunate outcomes: the customer may alter their mail production or preparation yearly in light of a changed price differential, which would have repercussions for the stability and efficiency of operations of the Postal Service; or worse, the ever-changing relationships could have a chilling effect on those decisions and investments, and a concomitant effect on Postal Service efficiency. Ensuring that price relationships are not jolted each year, based on the latest cost avoidance figure, therefore serves to incent stable mailer worksharing in the long-run, and allows for more efficient Postal Service operations.

In addition, the cost avoidance figures must be viewed as estimates, rather than absolutely precise figures. There will be year-to-year variation in the precise arrangement of the mail mix, such as the number of pieces at a given presort level relative to the number at another presort level, or the number of pieces dropshipped to the various destination facilities. The possibly small variation in the billing determinants could lead to small variations in the weighted averages, such that the precision of the result is subject to the vagaries of such small variations, and much effort could be wasted in following relatively small categories as they move slightly up and down from year to year. In the pre-PAEA world, much of this year-to-year shifting was smoothed out somewhat in the forecasting process and by virtue of the number of years between rate changes. In the PAEA world, however, with the prospect of annual price changes and annual examination of relationships, absolute adherence to any strict 100 percent passthrough pricing rule could lead to a price structure whose incentives are constantly being jolted, to the detriment of mailers, and, therefore, the efficient operation of the Postal Service.

Overall, the application of section 3622(e) must recognize that there is inherent imprecision in the estimation of the cost avoidances, and in the calculation of the prices, revenue per piece figures, and passthroughs. Furthermore, as several mailers noted in their comments in Docket No. ACR2007 and in this docket, there is an inherent asynchronicity between the retrospective estimates of avoided costs in the Annual Compliance Report (ACR) and the prospective nature of the adjusted prices. This inherent temporal mismatch also argues against applying the section 3622(e) in an unnecessarily inflexible fashion. Overall, section 3622(e) should be applied over the long-term, as a principle that should guide pricing over a series of price adjustments, and that allows some measure of managerial discretion.

First-Class Mail – Automation 5-digit letters:

The planned discount for presorting to 5-digits is the same as the existing discount: 2.2 cents. This discount was increased in Docket No. R2006-1 from 1.5 cents to 2.2 cents. Maintaining the discount at its current level of 2.2 cents will ensure that mailers who have taken steps to increase the presort level of their mailings since last year will continue to receive the same discount. This not only produces more efficient mail, but enhances the stability of the relationships between prices, and therefore their predictability. Such stability is important to postal operations, which are predicated on a smooth flow of finely presort mail, particularly for this critical discount.

Furthermore, the passthrough barely exceeds 100 percent. In fact, the discount is only 1/10th of a cent larger than the cost differential, the smallest amount of deviation possible. The Postal Service respectfully suggests that such small deviations from the cost avoidance figure should be of no regulatory moment, given the inherent imprecision of the estimate.

Standard Mail – Automation Mixed AADC letters:

To place the new passthrough for this automation (prebarcoding) discount in better context, it is useful to consider the recent past. Under the Docket No. R2005-1 prices in effect until last May, a comparison of the operative rate for prebarcoded Mixed AADC Standard letter mail, versus the rate for the same mail if not prebarcoded, showed a difference of 5.1 cents. In Docket No. R2006-1, the Postal Service proposed some restructuring, along with a reduction of the operative rate difference for this particular mail to 4.0 cents. The Commission, however, recommended a different set of rates, resulting in the much lower current rate difference of 0.3 cents. The Commission's rates, based on a commensurately low estimate of the relevant cost difference, reduced the rate difference to less than 6 percent of what it had been previously. The Postal Service's new prices will increase the difference to 1.4 cents. Clearly, a price difference at this level is far lower than the previous 5.1 cents, but it is also sufficiently above 0.3 cents to provide what the Postal Service believes is a more realistic incentive to prebarcode this mail. Given, however, the extremely low level of the cost avoidance (that constitutes the denominator in the passthrough equation), the arithmatic result is necessarily a very high percentage passthrough. At the same time, in absolute terms, the difference between the new discount level and the cost avoidance estimate is not large -- only about one cent.

Standard Mail – Automation Mixed ADC flats:

This is an automation (prebarcoding) discount. The barcoding of flats will enhance the ability of the Postal Service to implement its Flats Sequencing Sorting (FSS) system. A strong incentive to barcode flats will therefore enhance the efficiency for the Postal Service to process and deliver its flat-shaped mail. Therefore, looking forward, stronger, rather than weaker, incentives for barcoding flats may be initially necessary to create incentives for mailers to make the required infrastructure investments to begin applying the barcodes which are necessary for the Postal Service to achieve needed efficiencies. The new discount gives mailers a more predictable picture of the immediate future price relationships between barcoded and non-barcoded flat-shaped mail, assuring them that the initial start-up investment will be worthwhile.

Standard Mail – Barcode discount for Parcels and NFMs:

This is actually a surcharge for <u>not</u> prebarcoding parcels and NFMs. The new surcharge is identical to the current surcharge. As discussed above, this leads to predictability and stability in the price structure, and helps to maintain an efficient mailstream. Barcodes enhance the efficiency of parcel mail processing by allowing parcels to be sorted on machines (PSMs or APPS). Reducing the surcharge from its present value may lead to fewer parcels and NFMs being prebarcoded. This reduction would therefore impede the efficient operation of the Postal Service.

Furthermore, the Postal Service does not have cost data that uniquely measure avoided costs for prebarcoding Standard Mail parcels or NFMs. For this reason, the workshare discounts table did not calculate a passthrough. In a footnote, the surcharge was compared to the avoided cost from the Parcel Post cost model (3 cents); if this datum is used, the "passthrough" exceeds 100 percent. However, the true cost avoidance and passthrough is unknown. For purposes of this price adjustment, the Postal Service did not consider this cost data to be a sufficient basis to revoke the signal so recently sent to mailers to improve efficiency, which would not enhance either stability or predictability of the price structure.

Standard Mail - Machinable Parcels presort discounts (BMC and 3-digit):

Standard Mail machinable parcels is a relatively new product, having been priced separately (*i.e.*, other than as a surcharged Standard Mail flat) for less than one year. The new presort discounts for machinable parcels are not substantially different from the current discounts, which also have passthroughs over 100 percent. Setting the discounts at a 100 percent passthrough would require reducing the discounts from their present values, which may lead to fewer presorted parcels and greater movement of Standard Mail parcels to the BMCs—an outcome that Postal Service Operations believes is not efficient. A reduction in the discount would therefore impede the efficient operation of the Postal Service. Keeping the discount near the existing discount will also enhance stability in the price structure, which has its own efficiency benefits, as discussed above.

Furthermore, the Postal Service does not have a cost model designed specifically for Standard Mail machinable parcels, partly due to a lack of data for pieces that were hitherto not clearly marked and defined. Approximate cost reference points for Standard Mail parcels and NFMs were therefore estimated based on models for larger parcels and Standard Mail flats. For this reason, the cost avoidance estimates for Standard Mail machinable parcels (and therefore the cost avoidance passthroughs) are still uncertain. Given the approximate nature of the cost avoidance estimates, the amount by which the passthroughs exceed 100 percent is not large.

Standard Mail -- Parcels & NFMs DDU discount:

The DDU discounts for Standard Mail regular parcels and NFMs are relatively new discounts, having been in place for less than one year, and were intended to induce mailers to move parcels and NFMs out of the BMCs and into the DDUs. Reducing the discounts below the level set forth by the Postal Service in its Notice would likely undermine this incentive to move towards the more efficient processing path, and would therefore impede the efficient operation of the Postal Service. Reducing the discounts would also appear to mailers to be retrenching on the incentive structure built into the Postal Service's rate proposals in Docket No. R2006-1, and would therefore reduce the transparency and predictability of the overall pricing incentive structure for Standard Mail parcels and NFMs.

Furthermore, the Postal Service does not have a dedicated cost model for Standard Mail parcel and NFM drop-shipping, and the only avoided cost estimates available are for Standard Mail as a whole. The implications of this are discussed in response to Question 1.d below.

BPM DDU Discount:

In the case of the DDU discount for Bound Printed Matter, the Postal Service believes that increasing the discount is necessary in order to encourage more BPM mailers to sort their pieces to 5-digits and enter them at the DDU, which is the most efficient processing path. As such, the Postal Service believes that reducing the discount below the level it has set forth in its Notice would "impede the efficient operation of the Postal Service," because it would provide mailers with less of an incentive to drop their pieces at the DDU.

Furthermore, the Postal Service was also mindful of the need to send an appropriate price signal relative to DBMC and DSCF parcel prices for BPM. When measured against the unit costs of origin-entered (non-drop shipped) parcels (as in the ACR and in the worksharing discounts table accompanying the Notice), the BPM parcels DDU per-piece discount shows a passthrough of 110 percent. But the DDU price in the Notice actually <u>maintains</u> appropriate price relationships with BPM prices for DBMC and DSCF parcels. The FY07 ACR cost difference between DSCF and DDU parcels is 17.08 cents; the effective DSCF-DDU discount is 17.1 cents, 100 percent of the cost difference, rounded to the nearest tenth of a cent. The FY07 ACR cost difference between DBMC and DDU parcels is 55.63 cents; the effective DBMC-DDU discount is 54.5 cents, 98 percent of the cost difference. When developing its prices, the Postal Service determined that the DBMC per-piece passthrough should not be reduced all the way to 100 percent in one step (as discussed in the response to Question 2 below). Therefore, maintaining stable and predictable dropship pricing relationships and averting possible "rate shock" by avoiding a whipsaw effect on mailers--first sharply decreasing and later restoring the relative DBMC-DDU and DSCF-DDU per-piece discounts--required setting the DDU price so that the appropriate price signals were given relative to DBMC and DSCF parcels prices, rather than relative to origin parcels prices.

(d) The Postal Service does not have the density by shape data needed to quantify the understatement of avoided costs. The discussion referred to in the Question was based on an inference drawn from several facts:

1. The cost avoidance estimates developed for Standard Mail are for Standard Mail as a whole and are expressed in cost avoided per pound of mail.
2. Parcels and NFMs make up only a small part of Standard Mail, accounting for only 0.6 percent of all pieces and 2.8 percent of all weight in FY 2007 (Source: FY 2007 Standard Mail billing determinants, Table G5).
3. Transportation costs are incurred (and avoided) based on the cubic volume of mail, rather than weight.
4. Parcels and NFMs, because of their content, packaging and, the way they fill containers, tend to take up more cubic volume per pound than other, denser types of mail. Therefore, they can avoid more transportation costs per pound than more dense shapes of mail that stack more compactly.

Based on these facts, the Postal Service believes that the avoided costs per-pound estimated for Standard Mail as a whole is strongly influenced by flats and letters, which make up almost all of Standard Mail, and that these avoided costs figure do not adequately measure the larger costs avoided by the less dense, and so more voluminous, machinable parcels, when measured on a per-pound basis. Therefore, it is likely that the class-wide Standard Mail dropship avoided costs understate the savings from dropshipping parcels and NFMs on a per-pound basis.

QUESTION 2

In its discussion of the worksharing passthroughs for Package Services, the Postal Service justifies passthroughs in excess of 100 percent for BPM destination bulk mail center (DBMC) and destination sectional center facility (DSCF) flat and parcel dropship discounts and Media Mail and Library Mail 5-digit presort discounts by reducing the discounts from the current level, and stating that further reductions to achieve 100 percent passthroughs are intended for future adjustments because adjusting them all the way to 100 percent now would generate excessively high rate increases.

Assuming that the language in the Notice is identifying 39 U.S.C. 3622(e)(2)(B) as the justification for the BPM DBMC and DSCF flat and parcel dropship discounts and Media Mail and Library Mail 5-digit presort passthroughs exceeding 100 percent, please explain the process by which the Postal Service determined that moving all the way to 100 percent passthrough in a single adjustment would cause excessive rate shock, and how it selected the amount of reduction in the discount that would avoid excessive rate shock.

If the quoted language of the Notice is not referring to 39 U.S.C. 3622(e)(2)(B), then please identify the specific exception in 39 U.S.C. 3622(e)(2) or (3) that the Postal Service is invoking to justify BPM DBMC and DSCF flat and parcel dropship and Media Mail and Library Mail 5-digit presort passthroughs in excess of 100 percent, and explain why each planned discount fits the exception.

RESPONSE:

This Question is correct in assuming that the Postal Service was referring to section 3622(e)(2)(B) when discussing the referenced passthroughs. That section allows a passthrough to be greater than 100 percent if necessary “to mitigate rate shock.” The term “rate shock” is not defined in the statute, which is consistent with the fact that identifying “rate shock” has always been a matter of judgment in setting postal prices.

In determining whether a particular pricing change would possibly lead to “rate shock,” the Postal Service takes into account a number of factors. These include the size of the change in the price or prices in question, the size of the change in prices of other price cells or pricing elements for the same or related mail categories, the length of time between pricing changes, the length of time since the price or prices in question were last changed, the overall increase for the class and for all mail classes, the absolute size of the price change, and the likely impact on the customers who use the pricing categories. These factors are considered holistically, rather than used in a formula or other formalistic procedure, to develop the judgment whether a particular level of price increase would lead to “rate shock,” and whether (and to what extent) any mitigation should occur.

In the case of Media Mail/Library Mail, the product receives an above-average increase overall of 4.54 percent. Within Media Mail, the one-pound rate receives an increase of 9.2 percent, slightly over twice the product average increase. Eliminating the excess passthrough all in one step would have led to an increase for the first-pound price of over 30 percent, which the Postal Service deemed unacceptably high for purposes of this particular price change, given the circumstances of the overall increase for Media Mail and Library Mail, and the desire of the Postal Service to adjust prices in a predictable and stable manner. The more modest, 9.2 percent increase was judged by the Postal Service to be a large enough step, both in relative and absolute terms, to ask Media Mail customers to pay, given that the excess 5-digit presort incentive has been in place for a long time. The Postal Service also judged that a more gradual path towards correction of the excess incentive was also consistent with maintaining the predictability and stability of prices. This decision was supported by the fact that the 5-digit presort category has relatively few pieces, meaning the discount is not a source of significant financial disruption, and thus can be reduced over time along a smoother, more predictable path, without hurting the product financially.

Library Mail prices are tied directly to Media Mail prices. The same rationale that applied to determining the appropriate price path to follow for Media Mail also applied to Library Mail. Once the Media Mail prices are determined, the Library Mail prices follow, since the pricing elements for Library Mail are set at 95 percent of the corresponding Media Mail pricing elements.

When it approached its pricing for BPM, the Postal Service recognized that both its existing DBMC and DSCF per-piece discount passthroughs significantly exceeded avoided costs. In this price adjustment, the Postal Service reduces the passthrough for DBMC from 169 percent (in the FY2007 ACR) to 144 percent for flats and 146 percent for parcels. With these reductions in the discounts, the prices for close-in DBMC flats increase by more than 8 percent in some pricing cells. To put these increases in context, the overall increase for BPM flats is less than 1 percent, and the increase in BPM parcels is 2.1 percent. Had the Postal Service adjusted the DBMC per-piece discounts to be 100 percent of FY 2007 ACR cost differences, the increases in many price cells would have significantly moved into double-digit increases. This was judged to be an excessive increase to ask BPM flats and parcels mailers to pay in the circumstances of this particular pricing adjustment. Taking into account these and other factors, including the fact that the misalignment of the DBMC incentive has been in place for a while, the Postal Service deemed that a more gradual path for reducing this passthrough would better maintain a more stable and predictable price structure for drop-shipped BPM.

While the current DSCF per-piece discounts do not exceed avoided costs by nearly as much as the DBMC discounts (122 percent in the FY 2007 ACR), and the price increases for DSCF pieces in this price adjustment are not as large as the increases for some DBMC price cells, the Postal Service also considered the importance of maintaining stable pricing relationships when it decided not to reduce the DSCF passthrough all the way to 100 percent. The new discounts represent reductions in the DSCF per-piece discount passthroughs (to 115 percent for flats and 113 percent for parcels). Going farther, and certainly going all the way to 100 percent, would have caused a significant reduction in the relative discount between DBMC and DSCF that the Postal Service judged was too abrupt. Moreover, if the DBMC passthrough were then further reduced in subsequent price adjustments, while the DSCF discount maintained at 100 percent, the DSCF-DBMC relative per-piece discount would likely have increased sharply as the DBMC discount was lowered. The impact on the relative discount (and on the signals sent to customers) would have been to overshoot the target: the DSCF-DBMC per-piece discount would have been sharply reduced in one round of price changes and then increased in subsequent rounds as the DBMC discount moved closer to 100 percent. This type of whipsaw path for the relative discount runs counter to the Postal Service's aims of having predictable and stable paths when relative prices must change. Considering not just the impact of a price change on the overall price mailers must pay, but on how it changes important relative prices is one aspect of "rate shock" that may not be obvious, but must be considered. So, although the overall DSCF prices could possibly have tolerated further price increases, the Postal Service judged that it would lessen the potential for "rate shock" by keeping the DSCF-DBMC per-piece relationship relatively stable and moving both the DBMC and DSCF excess per-piece drop ship incentives closer to 100 percent passthroughs in tandem.

In all three cases, Media Mail, Library Mail and BPM, the Postal Service anticipates that, *ceteris paribus*, the passthroughs discussed in this response will be reduced over time and the passthroughs will move closer to 100 percent in line with the provisions of section 3622(e)(2)(B)(ii).

Finally, it should be noted that the passthroughs for the 5-digit presort discounts in Media Mail and Library Mail can also be justified under section 3622(e)(2)(C), since those types of mail consist solely of mail matter having ECSI value.

Respectfully submitted,

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