

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Modification of Mail Classification Schedule
Regarding Bound Printed Matter

Docket No. MC2008-3

PUBLIC REPRESENTATIVE COMMENTS
IN RESPONSE TO NOTICES OF CLASSIFICATION CHANGE
FOR MARKET-DOMINANT BOUND PRINTED MATTER POSTAL PRODUCTS
(April 9, 2008)

The Public Representative hereby comments on the United States Postal Service's classification change for Bound Printed Matter (BPM), a market-dominant postal product. Effective May 12, 2008, the Postal Service Governors established a classification change for BPM to require a permit fee for all BPM. The Postal Service submitted a notice to this Commission of a conforming change to the Mail Classification Schedule (MCS).¹ The Postal Service subsequently filed a notice amending the proposed change. The amendment discards the initial proposal to require a permit fee for all BPM, thus reverting to the current requirement of an annual permit fee for destination-entered BPM flats and parcels. In addition, the amendment proposes to modify the MCS to require that postage for BPM must be paid by permit imprint only.² According to the Postal Service, the amendment was added as a result of inquiries regarding payment of certain fees. The Postal Service says revisions to the Domestic

¹ Notice of the United States Postal Service of Classification Change, March 20, 2008.

² Notice of United States Postal Service of Amendment to Conforming Changes in Mail Classification Schedule Submitted with Notice of Classification Change, March 27, 2008.

Mail Manual (DMM) will clarify the matter, but that the amended MCS change will provide additional clarity.³

The Commission noticed for comment the classification change as well as the amended change and provided for comments by April 9, 2008.⁴ The Public Representative was designated by notice of April 2, 2008.

Currently, a permit imprint mailing generally requires a minimum of 200 pieces or 50 pounds. Thus, the proposed MCS language to require a permit imprint for all BPM mail would eliminate the option of mailing a single-piece flat or parcel at BPM rates. However, the Postal Service's response to CIR No. 1 advises that the Postal Service will revise the DMM, 604.5.1.2, to add an exception to the general rule that permit imprint mailings must contain at least 200 pieces or 50 pounds. The date for the addition to the exemptions is not provided in the response. The Postal Service response states "section 5.1.2. [of the DMM] is being amended to add an exception for Nonpresorted Bound Printed Matter from the general requirement that a permit imprint mailings contain at least 200 pieces or 50 pounds." Response to CIR No. 1, Question 1(a). This change is important from the standpoint of the small volume mailer. This will effectively permit single-piece BPM mailings and other mailings of less than 200 pieces or the 50 pound minimum, as long a permit imprint is paid.

In any event, the proposed classification change eliminates the current availability of window service for individuals wishing to mail any single-piece BPM flat or

³ The Postal Service notice does not explain the nature of the inquiries or the specific concerns expressed that led to the decision to clarify the MCS.

⁴ Notice Of Classification Change For Market Dominant Products, March 21, 2008; Notice Of Amended Classification Change For Market Dominant Products, March 28, 2008.

parcel. Thus, the current expectation is that an individual will be allowed to mail a single-piece BPM flat or parcel only if a permit imprint fee is paid (soon to be \$180)⁵ and if the individual mailer is willing to expend the extra effort to do the paperwork required for mailing at a BPM rate at a Business Mail Entry Unit rather than at a retail window.

If the mailer does not already have a permit imprint and is unwilling to incur the fee for a permit imprint fee to mail at a BPM rate, other than mailing at the much more expensive First-Class, Priority or Express Mail rates, two mailing options are available. One option is the Parcel Post Intra-BMC or Inter-BMC single-piece rate. Alternatively, if no advertising is included in the mailing and the minimum number of pages are included in the mailpiece, unzoned Media Mail is available. In either case, postage will probably increase and, in the case of Parcel Post, will increase significantly. The rate shock of using the Parcel Post alternative in most instances is well over fifty percent and, in one instance, exceeds two hundred percent. For instance, the postage for a three and one-half pound, Zone 4 Inter-BMC Parcel Post flat is 200 percent higher than the BPM flat rate of the same weight and zone. Generally, Parcel Post rates exceed the BPM rates by more than one hundred percent. The Tables attached illustrate the impacts on postage by using the Parcel Post mailing option.

If Media Mail is selected as the alternative for mailing, the postage increase is not as much as the postage increase for Parcel Post and is actually slightly less expensive than BPM mail sent to the farther zones, but, as noted above, Media Mail is not available if the mailpiece includes advertising and the minimum page requirement.

⁵ See Docket No. R2008-1, United States Postal Service Notice of Market-Dominant Price Adjustment, Appendix, New Prices and Fees, 1505.2 Applications and Mailing Permits, Authorization to Use Permit Imprint (one-time only).

The Postal Service's notice in this docket appears to comply with the Commission's Rule 3020.91 which provides for at least 15 days notice of a proposed change in Product descriptions. The Rule is applicable when the changes do not rise to a modification or transfer of the market dominant Product *list* or a modification or transfer of the competitive Product *list*. The rule provides flexibility for the Postal Service to modify or correct the terms of Products without modifying the Product lists themselves. If the Product lists are being transferred from the market dominant to the competitive category, the more extensive requirements of § 3642 of the PAEA would come into play. When implementing Rule 3020.91, the Commission expressed its intention to undertake only a limited review of filings pursuant to § 3020.91, as follows:

Subpart E—Requests Initiated by the Postal Service to Change the Mail Classification Schedule

Commission analysis. Commenters correctly infer that there is a continuum of possible classification changes from those only requiring the Postal Service to inform the Commission of a classification change to those triggering the requirements of 39 U.S.C. 3642. The Postal Service asserts that it will initially provide an opportunity for formal public comment on important and complex changes to its processes and products. Postal Service Reply Comments, October 9, 2007, at 27-29. Thus, it contends, the public will have notice and an opportunity for comments on proposed changes provided by the Postal Service.

Parties also have the opportunity to utilize the Commission's complaint procedures whenever compliance with the statutory requirements becomes an issue. Further opportunities for public comment will be available during the annual compliance process, and also may be available when the Commission evaluates service standards.

The rules proposed in subparts B, C, and D establish formal procedures for classification changes triggering the requirements of 39 U.S.C. 3642. For classification changes below this level, the proposed rules provide the Postal Service with great flexibility to manage Postal Service products, as long as the products conform to the statutory requirements of the PAEA. Neither the PAEA nor sound public policy

suggests that the Commission exercise pre-implementation authority at this time.

The purpose of subpart E is to keep the Mail Classification Schedule up to date when product changes are made below the 39 U.S.C. 3642 level. This facilitates the Commission's maintenance of the product lists and makes it possible for the Commission to undertake its other statutory responsibilities. Subpart E was not intended to provide an avenue for comprehensive pre-implementation review of classification changes.

The Commission will provide notice and the opportunity for comment on Mail Classification Schedule changes under subpart E. Comments can be beneficial in assuring that proposals are properly filed under the correct rules, and not inadvertently filed under subpart E. For these limited purposes, it will be sufficient to provide notice of Postal Service submissions under rule 3020.91 on the Commission's website and allow a period for public comment on whether the changes are inconsistent with 39 U.S.C. 3642.⁶

Thus, the Commission's review of the proposed change in the product descriptions and of the comments in this proceeding is limited. The Commission has implemented rules that provide for Postal Service flexibility "as long as the products conform to the statutory requirements of the PAEA" and, further, that neither the PAEA nor sound policy would suggest pre-implementation authority should be exercised during this proceeding. Besides having the opportunity of addressing issues of discrimination in future annual compliance review proceedings or when service standards are evaluated, parties have an opportunity to utilize the complaint procedure to invoke any of the provisions of chapter 36 in title 39. Complaints may also invoke § 403(c) of title 39. That section provides that the Postal Service shall not "make any undue or unreasonable discrimination among users of the mails, nor shall it grant any undue or unreasonable preferences to any such user."

⁶ Order Establishing Ratemaking Regulations For Market Dominant And Competitive Products, Docket No. RM2007-1, Order No. 43, paras. 4027-4032 at 107-08.

The Postal Service's stated intent to revise the DMM to allow single piece BPM, if paid by permit imprint, will keep open the single-piece mailing option for BPM mailers. Nevertheless, a future issue for consideration is whether this classification change can be successfully challenged in a complaint proceeding by rising to the level of discrimination against potential BPM mailers in contravention of the policies of the PAEA. For some BPM mailers, there is no question that the option to use other classes of mail is more limited and the cost of postage will increase significantly if Parcel Post is the alternative class of mail selected. There is also the inconvenience of losing access to window service to mail BPM mail. However, there are other PAEA policies also at play which may be factored into the equation to be considered in determining whether any discrimination is undue. Mailers do not necessarily have the right under the PAEA to continue to receive the service previously offered and available under the Postal Reorganization Act. On the other hand, the Postal Service has not justified this change, either on the basis of cost savings or for other reasons of managerial economy. These factors would be relevant in resolving a claim of undue discrimination.

As for Commission review in this proceeding, the Commission's discussion in Order No. 43 and its Rules make explicit its policy that the descriptions of Products may be modified and sub-categories of Products might even be eliminated pursuant to procedures under Rule 3020.90 as a matter of managerial discretion without Commission intervention. Only if the Product *lists* are being modified or transferred might the Commission take a larger role in reviewing the changes.

The Commission noted in its discussion in Order No. 43, quoted above, that there is a continuum of potential changes in Product descriptions: "Commenters

correctly infer that there is a continuum of possible classification changes from those only requiring the Postal Service to inform the Commission of a classification change to those triggering the requirements of 39 U.S.C. 3642.” Significant changes in product descriptions that may seek to eliminate entire sub-categories of a product would approach if not reach the point of triggering the requirements of § 3642. The Commission must be mindful of modifications to Product lists that approach the triggering point to insure the policies of § 3642 are met. In this instance, the changes to BPM will tend to impose large postage increases upon certain single piece BPM mailers who will no longer have access to retail window service and must now enter their BPM at a Business Mail Entry Unit. Large increases in the postage for individual mailpieces will be incurred. But this change does not eliminate an entire rate sub-category of a Product and review here is limited. Rather, as the Commission has pointed out, a complaint proceeding is one place for consideration of these matters.

The Public Representative respectfully submits the foregoing Comments for the Commission’s consideration.

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COMPARISON OF RATES FOR BOUND PRINTED MATTER NONPRESORTED
AND PARCEL
POST

EFFECTIVE MAY 12, 2008

Effective May 12, 2008 Bound Printed Matter Flats
Nonpresorted

TABLE
1

Weight	Local	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1	\$1.89	\$1.89	\$1.93	\$1.99	\$2.08	\$2.19	\$2.25	\$2.44
1.5	\$1.89	\$1.89	\$1.93	\$1.99	\$2.08	\$2.19	\$2.25	\$2.44
2	\$1.98	\$1.98	\$2.04	\$2.12	\$2.24	\$2.38	\$2.46	\$2.72
2.5	\$2.08	\$2.08	\$2.15	\$2.25	\$2.40	\$2.58	\$2.68	\$3.00
3	\$2.17	\$2.17	\$2.26	\$2.38	\$2.56	\$2.77	\$2.89	\$3.28
3.5	\$2.27	\$2.27	\$2.37	\$2.51	\$2.72	\$2.97	\$3.11	\$3.56
4	\$2.36	\$2.36	\$2.48	\$2.64	\$2.88	\$3.16	\$3.32	\$3.84
4.5	\$2.46	\$2.46	\$2.59	\$2.77	\$3.04	\$3.36	\$3.54	\$4.12
5	\$2.55	\$2.55	\$2.70	\$2.90	\$3.20	\$3.55	\$3.75	\$4.40
6	\$2.74	\$2.74	\$2.92	\$3.16	\$3.52	\$3.94	\$4.18	\$4.96
7	\$2.93	\$2.93	\$3.14	\$3.42	\$3.84	\$4.33	\$4.61	\$5.52
8	\$3.12	\$3.12	\$3.36	\$3.68	\$4.16	\$4.72	\$5.04	\$6.08
9	\$3.31	\$3.31	\$3.58	\$3.94	\$4.48	\$5.11	\$5.47	\$6.64
10	\$3.50	\$3.50	\$3.80	\$4.20	\$4.80	\$5.50	\$5.90	\$7.20
11	\$3.69	\$3.69	\$4.02	\$4.46	\$5.12	\$5.89	\$6.33	\$7.76
12	\$3.88	\$3.88	\$4.24	\$4.72	\$5.44	\$6.28	\$6.76	\$8.32
13	\$4.07	\$4.07	\$4.46	\$4.98	\$5.76	\$6.67	\$7.19	\$8.88
14	\$4.26	\$4.26	\$4.68	\$5.24	\$6.08	\$7.06	\$7.62	\$9.44
15	\$4.45	\$4.45	\$4.90	\$5.50	\$6.40	\$7.45	\$8.05	\$10.00

Effective May 12, 2008 Bound Printed Matter Nonpresorted Parcels

TABLE
2

Weight	Local	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1	\$2.15	\$2.15	\$2.19	\$2.25	\$2.34	\$2.45	\$2.51	\$2.70
1.5	\$2.15	\$2.15	\$2.19	\$2.25	\$2.34	\$2.45	\$2.51	\$2.70
2	\$2.24	\$2.24	\$2.30	\$2.38	\$2.50	\$2.64	\$2.72	\$2.98
2.5	\$2.34	\$2.34	\$2.41	\$2.51	\$2.66	\$2.84	\$2.94	\$3.26
3	\$2.43	\$2.43	\$2.52	\$2.64	\$2.82	\$3.03	\$3.15	\$3.54
3.5	\$2.53	\$2.53	\$2.63	\$2.77	\$2.98	\$3.23	\$3.37	\$3.82
4	\$2.62	\$2.62	\$2.74	\$2.90	\$3.14	\$3.42	\$3.58	\$4.10
4.5	\$2.72	\$2.72	\$2.85	\$3.03	\$3.30	\$3.62	\$3.80	\$4.38
5	\$2.81	\$2.81	\$2.96	\$3.16	\$3.46	\$3.81	\$4.01	\$4.66
6	\$3.00	\$3.00	\$3.18	\$3.42	\$3.78	\$4.20	\$4.44	\$5.22
7	\$3.19	\$3.19	\$3.40	\$3.68	\$4.10	\$4.59	\$4.87	\$5.78
8	\$3.38	\$3.38	\$3.62	\$3.94	\$4.42	\$4.98	\$5.30	\$6.34
9	\$3.57	\$3.57	\$3.84	\$4.20	\$4.74	\$5.37	\$5.73	\$6.90
10	\$3.76	\$3.76	\$4.06	\$4.46	\$5.06	\$5.76	\$6.16	\$7.46
11	\$3.95	\$3.95	\$4.28	\$4.72	\$5.38	\$6.15	\$6.59	\$8.02
12	\$4.14	\$4.14	\$4.50	\$4.98	\$5.70	\$6.54	\$7.02	\$8.58
13	\$4.33	\$4.33	\$4.72	\$5.24	\$6.02	\$6.93	\$7.45	\$9.14
14	\$4.52	\$4.52	\$4.94	\$5.50	\$6.34	\$7.32	\$7.88	\$9.70
15	\$4.71	\$4.71	\$5.16	\$5.76	\$6.66	\$7.71	\$8.31	\$10.26

Effective May 12, 2008 Parcel Post Intra-BMC Machinable

TABLE
3

Weight	Local	Zones 1&2	Zone 3	Zone 4	Zone 5
1	\$3.67	\$4.02	\$4.05	\$4.14	\$4.33
1.5	\$4.11	\$4.50	\$4.80	\$4.89	\$5.16
2	\$4.11	\$4.50	\$4.80	\$4.89	\$5.16
2.5	\$4.51	\$5.00	\$5.48	\$5.60	\$5.97
3	\$4.51	\$5.00	\$5.48	\$5.60	\$5.97
3.5	\$4.88	\$5.70	\$6.11	\$6.23	\$6.71
4	\$4.88	\$5.70	\$6.11	\$6.23	\$6.71
4.5	\$5.21	\$6.29	\$6.65	\$6.80	\$7.40
5	\$5.21	\$6.29	\$6.65	\$6.80	\$7.40
6	\$5.51	\$6.67	\$7.15	\$7.30	\$8.01
7	\$5.74	\$7.03	\$7.60	\$7.77	\$8.60
8	\$5.93	\$7.61	\$8.03	\$8.21	\$9.13
9	\$6.13	\$7.93	\$8.42	\$8.65	\$9.62
10	\$6.32	\$8.27	\$8.84	\$9.34	\$10.08
11	\$6.49	\$8.56	\$9.18	\$9.70	\$10.50
12	\$6.67	\$8.87	\$9.52	\$10.05	\$10.90
13	\$6.84	\$9.07	\$9.82	\$10.38	\$11.28
14	\$7.00	\$9.24	\$10.10	\$10.74	\$11.62
15	\$7.15	\$9.41	\$10.39	\$11.03	\$11.94

TABLE
4

Effective May 12, 2008 Parcel Post Inter-BMC Machinable

Weight	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1	\$4.55	\$4.55	\$4.55	\$4.55	\$4.55	\$4.55	\$4.55
1.5	\$4.55	\$4.85	\$5.35	\$5.94	\$6.13	\$6.35	\$6.67
2	\$4.55	\$4.85	\$5.35	\$5.94	\$6.13	\$6.35	\$6.67
2.5	\$5.05	\$5.70	\$6.60	\$6.94	\$7.22	\$7.52	\$8.12
3	\$5.05	\$5.70	\$6.60	\$6.94	\$7.22	\$7.52	\$8.12
3.5	\$5.75	\$6.75	\$7.55	\$7.88	\$8.23	\$8.62	\$9.38
4	\$5.75	\$6.75	\$7.55	\$7.88	\$8.23	\$8.62	\$9.38
4.5	\$6.40	\$7.70	\$8.37	\$8.76	\$9.19	\$9.67	\$10.58
5	\$6.40	\$7.70	\$8.37	\$8.76	\$9.19	\$9.67	\$10.58
6	\$7.00	\$8.60	\$9.15	\$9.61	\$10.11	\$10.66	\$11.72
7	\$7.55	\$9.34	\$9.89	\$10.42	\$10.98	\$11.60	\$12.81
8	\$8.00	\$9.70	\$10.61	\$11.19	\$11.82	\$12.51	\$13.85
9	\$8.40	\$10.06	\$11.30	\$11.94	\$12.63	\$13.39	\$14.86
10	\$8.80	\$11.20	\$11.96	\$12.66	\$13.40	\$14.23	\$15.83
11	\$9.15	\$11.60	\$12.60	\$13.35	\$14.16	\$15.04	\$16.76
12	\$9.50	\$11.90	\$13.22	\$14.02	\$14.88	\$15.83	\$17.67
13	\$9.90	\$12.17	\$13.82	\$14.67	\$15.59	\$16.59	\$18.55
14	\$10.11	\$12.51	\$14.41	\$15.30	\$16.27	\$17.33	\$19.40
15	\$10.29	\$12.79	\$14.97	\$15.92	\$16.93	\$18.05	\$20.22

Effective May 12, 2008 Parcel Post Intra-BMC Machinable
Percent Increase Over Bound Printed Matter Flats
Nonpresorted

Table 5

Weight	Local	Zones 1&2	Zone 3	Zone 4	Zone 5
1	94.2%	112.7%	109.8%	108.0%	108.2%
1.5	117.5%	138.1%	148.7%	145.7%	148.1%
2	107.6%	127.3%	135.3%	130.7%	130.4%
2.5	116.8%	140.4%	154.9%	148.9%	148.8%
3	107.8%	130.4%	142.5%	135.3%	133.2%
3.5	115.0%	151.1%	157.8%	148.2%	146.7%
4	106.8%	141.5%	146.4%	136.0%	133.0%
4.5	111.8%	155.7%	156.8%	145.5%	143.4%
5	104.3%	146.7%	146.3%	134.5%	131.3%
6	101.1%	143.4%	144.9%	131.0%	127.6%
7	95.9%	139.9%	142.0%	127.2%	124.0%
8	90.1%	143.9%	139.0%	123.1%	119.5%
9	85.2%	139.6%	135.2%	119.5%	114.7%
10	80.6%	136.3%	132.6%	122.4%	110.0%
11	75.9%	132.0%	128.4%	117.5%	105.1%
12	71.9%	128.6%	124.5%	112.9%	100.4%
13	68.1%	122.9%	120.2%	108.4%	95.8%
14	64.3%	116.9%	115.8%	105.0%	91.1%
15	60.7%	111.5%	112.0%	100.5%	86.6%

Effective May 12, 2008 Parcel Post Intra-BMC Machinable Table 6

Weight	Local	Zones 1&2	Zone 3	Zone 4	Zone 5
1	70.7%	87.0%	84.9%	84.0%	85.0%
1.5	91.2%	109.3%	119.2%	117.3%	120.5%
2	83.5%	100.9%	108.7%	105.5%	106.4%
2.5	92.7%	113.7%	127.4%	123.1%	124.4%
3	85.6%	105.8%	117.5%	112.1%	111.7%
3.5	92.9%	125.3%	132.3%	124.9%	125.2%
4	86.3%	117.6%	123.0%	114.8%	113.7%
4.5	91.5%	131.3%	133.3%	124.4%	124.2%
5	85.4%	123.8%	124.7%	115.2%	113.9%
6	83.7%	122.3%	124.8%	113.5%	111.9%
7	79.9%	120.4%	123.5%	111.1%	109.8%
8	75.4%	125.1%	121.8%	108.4%	106.6%
9	71.7%	122.1%	119.3%	106.0%	103.0%
10	68.1%	119.9%	117.7%	109.4%	99.2%
11	64.3%	116.7%	114.5%	105.5%	95.2%
12	61.1%	114.3%	111.6%	101.8%	91.2%
13	58.0%	109.5%	108.1%	98.1%	87.4%
14	54.9%	104.4%	104.5%	95.3%	83.3%
15	51.8%	99.8%	101.4%	91.5%	79.3%

Effective May 12, 2008 Parcel Post Inter-BMC Machinable
 Percent Increase Over Bound Printed Matter Flats
 Nonpresorted

TABLE
7

Weight	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1	140.7%	135.8%	128.6%	118.8%	107.8%	102.2%	86.5%
1.5	140.7%	151.3%	168.8%	185.6%	179.9%	182.2%	173.4%
2	129.8%	137.7%	152.4%	165.2%	157.6%	158.1%	145.2%
2.5	142.8%	165.1%	193.3%	189.2%	179.8%	180.6%	170.7%
3	132.7%	152.2%	177.3%	171.1%	160.6%	160.2%	147.6%
3.5	153.3%	184.8%	200.8%	189.7%	177.1%	177.2%	163.5%
4	143.6%	172.2%	186.0%	173.6%	160.4%	159.6%	144.3%
4.5	160.2%	197.3%	202.2%	188.2%	173.5%	173.2%	156.8%
5	151.0%	185.2%	188.6%	173.8%	158.9%	157.9%	140.5%
6	155.5%	194.5%	189.6%	173.0%	156.6%	155.0%	136.3%
7	157.7%	197.5%	189.2%	171.4%	153.6%	151.6%	132.1%
8	156.4%	188.7%	188.3%	169.0%	150.4%	148.2%	127.8%
9	153.8%	181.0%	186.8%	166.5%	147.2%	144.8%	123.8%
10	151.4%	194.7%	184.8%	163.8%	143.6%	141.2%	119.9%
11	148.0%	188.6%	182.5%	160.7%	140.4%	137.6%	116.0%
12	144.8%	180.7%	180.1%	157.7%	136.9%	134.2%	112.4%
13	143.2%	172.9%	177.5%	154.7%	133.7%	130.7%	108.9%
14	137.3%	167.3%	175.0%	151.6%	130.5%	127.4%	105.5%
15	131.2%	161.0%	172.2%	148.8%	127.2%	124.2%	102.2%

Effective May 12, 2008 Parcel Post Inter-BMC Machinable

TABLE
8

Percent Increase Over Bound Printed Matter Parcels Nonpresorted

Weight	Zones 1&2	Zone 3	Zone 4	Zone 5	Zone 6	Zone 7	Zone 8
1	111.6%	107.8%	102.2%	94.4%	85.7%	81.3%	68.5%
1.5	111.6%	121.5%	137.8%	153.8%	150.2%	153.0%	147.0%
2	103.1%	110.9%	124.8%	137.6%	132.2%	133.5%	123.8%
2.5	115.8%	136.5%	162.9%	160.9%	154.2%	155.8%	149.1%
3	107.8%	126.2%	150.0%	146.1%	138.3%	138.7%	129.4%
3.5	127.3%	156.7%	172.6%	164.4%	154.8%	155.8%	145.5%
4	119.5%	146.4%	160.3%	151.0%	140.6%	140.8%	128.8%
4.5	135.3%	170.2%	176.2%	165.5%	153.9%	154.5%	141.6%
5	127.8%	160.1%	164.9%	153.2%	141.2%	141.1%	127.0%
6	133.3%	170.4%	167.5%	154.2%	140.7%	140.1%	124.5%
7	136.7%	174.7%	168.8%	154.1%	139.2%	138.2%	121.6%
8	136.7%	168.0%	169.3%	153.2%	137.3%	136.0%	118.5%
9	135.3%	162.0%	169.0%	151.9%	135.2%	133.7%	115.4%
10	134.0%	175.9%	168.2%	150.2%	132.6%	131.0%	112.2%
11	131.6%	171.0%	166.9%	148.1%	130.2%	128.2%	109.0%
12	129.5%	164.4%	165.5%	146.0%	127.5%	125.5%	105.9%
13	128.6%	157.8%	163.7%	143.7%	125.0%	122.7%	103.0%
14	123.7%	153.2%	162.0%	141.3%	122.3%	119.9%	100.0%
15	118.5%	147.9%	159.9%	139.0%	119.6%	117.2%	97.1%