

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Before Commissioners:

Robert G. Taub, Acting Chairman;
Tony Hammond, Vice Chairman;
Mark Acton;
Ruth Y. Goldway; and
Nanci E. Langley

Notice of Market-Dominant
Price Adjustment

Docket No. R2015-4

ORDER ON PRICE ADJUSTMENTS FOR FIRST-CLASS MAIL PRODUCTS
AND RELATED MAIL CLASSIFICATION CHANGES



Washington, DC 20268-0001

February 24, 2015

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ATTACHMENT

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(Issued February 24, 2015)

I. INTRODUCTION

On January 15, 2015, the Postal Service filed a notice of its planned price adjustments for market dominant products.¹ The Commission has reviewed the pricing proposals related to First-Class Mail for consistency with the requirements of title 39. The Commission concludes that the planned prices for First-Class Mail do not violate the price cap in 39 U.S.C. § 3622(d) and are consistent with, or justified by an exception to, the workshare discount limitations in 39 U.S.C. § 3622(e).

¹ United States Postal Service Notice of Market-Dominant Price Adjustment, January 15, 2015 (Notice).

II. PROCEDURAL HISTORY

Background. On January 15, 2015, the Postal Service filed a notice of inflation-based price adjustments affecting market dominant domestic and international products and services, along with four temporary mailing promotions, and numerous proposed classification changes. *See id.* The intended effective date is April 26, 2015. *Id.* at 1.

On January 20, 2015, the Commission issued Order No. 2327, which provided public notification of the Notice; established the instant docket for consideration of the Notice's consistency with applicable statutory and regulatory requirements; appointed a Public Representative; and provided an opportunity to comment.²

In response to a motion by MPA—the Association of Magazine Media, the Alliance of Nonprofit Mailers, and the Association for Postal Commerce,³ the Commission issued Order No. 2340.⁴ The order: (1) determined that the Notice was incomplete with respect to the price adjustments related to Standard Mail, Periodicals, Package Services, and Special Services; and (2) concluded that after the Postal Service files complete responses to certain Chairman's information requests, the Notice would be complete, and the 45-day notice period would begin for price adjustments related to the affected classes of mail. *Id.* at 4-5. First-Class Mail was the only class not affected by that order. *Id.* at 5. Consequently, this Order concerns only First-Class Mail; other classes of mail will be addressed in a subsequent order.

Note regarding prices in this Order. The market dominant prices that are currently in effect include a temporary exigent surcharge of 4.3 percent.⁵ The "base

² Notice and Order on Rate Adjustments, Classification Changes, and Temporary Promotions for Market Dominant Products, January 20, 2015 (Order No. 2327).

³ Motion of MPA—The Association of Magazine Media, Alliance of Nonprofit Mailers and Association for Postal Commerce for Extension of Time to File Comments, January 26, 2015.

⁴ Order Granting, In Part, Motion for Extension of Comment Deadline, February 2, 2015 (Order No. 2340).

⁵ Docket No. R2013-11, Order Granting Exigent Price Increase, December 24, 2013 (Order No. 1926).

prices” (*i.e.*, the price in effect without the exigent surcharge) were established in Docket No. R2013-10.⁶ The Commission previously determined that if the Postal Service were to seek an inflation-based price adjustment during the period in which the exigent surcharge was in effect, the Postal Service should address both the general requirements of 39 U.S.C. § 3622 and the specific workshare discount requirements on the base prices and any added inflation-based adjustment.⁷

In the instant docket, the Postal Service requests to increase the base prices while the exigent surcharge remains in effect. Consequently, two sets of prices are produced. The first set of prices reflects the proposed inflation-based increases to the base prices with the exigent surcharge added to the new inflation-adjusted prices. These are the prices that the Commission expects will go into effect when the Postal Service implements the planned price changes.⁸ Thus, the Commission includes these prices in the attachment to this Order that details the changes to the Mail Classification Schedule (MCS) arising from this Order. The second set of prices results from the adjustment of the base prices to reflect the proposed inflation-based increases. These prices will be in effect when the exigent surcharge is removed.

Consistent with Order No. 2319, the Commission has reviewed the base prices, the planned inflation-based adjustments, and the workshare discounts for compliance with 39 U.S.C. § 3622. Analysis of the percentage change in rates, worksharing discounts, and all other analyses compare the base prices to the planned inflation-based adjustments. However, when a specific product price is mentioned in this Order, the price includes the exigent surcharge because it is the price expected to go into effect on April 26, 2015.

⁶ Docket No. R2013-10, Order on Price Adjustments for Market Dominant Products and Related Mail Classification Changes, November 21, 2013 (Order No. 1890).

⁷ Docket No. R2013-11, Order on Exigent Surcharge Removal, January 12, 2015, at 9 (Order No. 2319).

⁸ The Postal Service intends to implement the new prices on April 26, 2015. Notice at 1. The Postal Service will notice the removal of the exigent surcharge at least 45 days prior to the day the exigent surcharge is removed. Order No. 2319 at 15.

Supplemental data and information. The Chairman issued, and the Postal Service responded to, several information requests seeking clarification of the Postal Service's planned price adjustments for First-Class Mail.⁹

Commenters. The Greeting Card Association (GCA);¹⁰ the National Association of Presort Mailers (NAPM);¹¹ the National Postal Policy Council (NPPC);¹² Pitney Bowes Inc. (Pitney Bowes);¹³ the Public Representative;¹⁴ and Stamps.com¹⁵ filed comments related to First-Class Mail.

III. FIRST-CLASS MAIL

A. Introduction and Compliance with the Price Cap

There are six products assigned to First-Class Mail: Single-Piece Letters/Postcards, Presorted Letters/Postcards, Flats, Parcels, Outbound Single-Piece First-Class Mail International, and Inbound Letter Post.¹⁶ The planned price increase of

⁹ Chairman's Information Request No. 2, January 27, 2015, question 1 (CHIR No. 2); Chairman's Information Request No. 3, January 28, 2015, questions 1-3 (CHIR No. 3); Chairman's Information Request No. 7, February 5, 2015 (CHIR No. 7); Chairman's Information Request No. 8, February 6, 2015, questions 1-3 (CHIR No. 8); Responses of the United States Postal Service to Chairman's Information Request No. 2, February 2, 2015, question 1 (Responses to CHIR No. 2); Responses of the United States Postal Service to Questions 1-5, and Question 6 (Parts A-D) of Chairman's Information Request No. 3, February 4, 2015, questions 1-3 (Responses to CHIR No. 3); Response of the United States Postal Service to Question 1 of Chairman's Information Request No. 7, February 9, 2015 (Response to CHIR No. 7); Responses of the United States Postal Service to Questions 1-3 of Chairman's Information Request No. 8, February 9, 2015 (Responses to CHIR No. 8).

¹⁰ Comments of the Greeting Card Association, February 4, 2015 (GCA Comments).

¹¹ Comments of the National Association of Presort Mailers, February 11, 2015 (NAPM Comments). NAPM also filed a motion for late acceptance of its comments. Motion of the National Association of Presort Mailers for Late Acceptance of Comments, February 11, 2015 (Motion). The Motion is granted.

¹² Comments of the National Postal Policy Council, February 4, 2015 (NPPC Comments).

¹³ Comments of Pitney Bowes Inc., February 4, 2015 (Pitney Bowes Comments).

¹⁴ Public Representative Comments in Response to United States Postal Service Notice of Market-Dominant Price Adjustment, February 4, 2015 (PR Comments).

¹⁵ Comments of Stamps.com, February 4, 2015 (Stamps.com Comments).

¹⁶ In its Notice, the Postal Service combines Outbound Single-Piece First-Class Mail International and Inbound Letter Post as "FCM International." Notice at 17, Table 5.

First-Class Mail is, on average, 1.956 percent. Library Reference PRC-LR-R2015-4/1. Table III-1 shows the percentage price changes for individual products within First-Class Mail, with revisions based on the application of the Commission's accepted methodology.

Table III-1

First-Class Mail Price Changes (By Product)¹⁷

First-Class Mail Product	Price Change %
Single-Piece Letters/Postcards	0.623
Presorted Letters/Postcards	2.422
Flats	2.437
Parcels	10.180
Outbound Single-Piece First-Class Mail International	4.399
Inbound Letter Post	1.708
Source: Library Reference PRC-LR-R2015-4/1.	

In this price adjustment, the Postal Service maintains the price of the first ounce Single-Piece Machinable Stamped Letter, while the price of a Single-Piece Machinable Metered Letter increases by one-half cent to 48.5 cents.¹⁸ Notice, Attachment A, Part II, Section 1105.5. The Postal Service increases the single-piece additional ounce price for letters from 21 to 22 cents¹⁹ and the Single-Piece Postcard price from 34 to 35

¹⁷ The percentage price changes in Table III-1 are calculated by comparing the base prices established by Docket No. R2013-10 to the prices resulting from this Order, prior to the application of the exigent surcharge.

¹⁸ The price prior to the application of the exigent surcharge is 46.5 cents. Notice at 18.

¹⁹ The single-piece additional ounce price for letters increases to 21 cents prior to the application of the exigent surcharge. *Id.*

cents.²⁰ *Id.* The price of the first ounce for a Single-Piece Flat remains 98 cents.²¹ *Id.* at Section 1115.5. The retail First-Class Mail Parcels price for the first three ounces increases to \$2.54.²² *Id.* at Section 1120.5.

Comments. The Public Representative comments that the Postal Service appears to have incorrectly used exigent prices that include the exigent surcharge as base prices for the Calendar Year (CY) 2015 First-Class Mail promotions calculations. PR Comments at 3. He also notes that the Postal Service has not distributed Letter Round-Trip Mailer service volumes and revenues to the applicable products. *Id.* at 4-5.

Commission analysis. The percentage price changes developed by the Commission in Table III-1 are slightly different from those developed by the Postal Service. First, the Postal Service's workpapers inappropriately used exigent prices as base prices for the CY 2015 First-Class Mail promotions. Because the promotions will likely be in effect after the surcharge expires, using exigent prices overstates the revenue forgone from offering the discounts. Second, the Commission distributes the revenue from Round-Trip Mailers to the applicable products and includes Alternate Postage in the price change calculation. Third, the Commission makes minor modifications to the Postal Service's price change calculations for Inbound Letter Post, as described in Section E., *infra*.

²⁰ The Single-Piece Postcard price increases to 34 cents prior to the application of the exigent surcharge. *Id.*

²¹ The Single-Piece Flat price prior to the application of the exigent surcharge is 94 cents. *Id.* at 19.

²² The Single-Piece First-Class Mail Parcels price prior to the application of the exigent surcharge is \$2.45. *Id.* at 18.

For further information, see Library References PRC-LR-R2015-4/1, 2, and NP1 filed concurrently with this Order.²³

The Commission finds the Postal Service's planned price adjustments for First-Class Mail comply with the price cap limitations specified by 39 U.S.C. § 3622(d). The Commission finds that the planned prices for individual products of First-Class Mail result in an increase in the price for First-Class Mail, as a class, of 1.956 percent. This creates 0.010 percent new unused price adjustment authority. As the Postal Service had no unused price adjustment authority before the instant docket, the unused price adjustment authority for First-Class Mail is also 0.010 percent. See Library Reference PRC-LR-R2015-4/1; Notice at 3.

B. Workshare Discounts

First-Class Mail offers 14 workshare discounts. Notice at 44. Pursuant to 39 U.S.C. § 3622(e), the Commission ensures workshare discounts do not exceed estimated avoided costs unless justified by a statutory exception. To determine if workshare discounts comply with section 3622(e), the Commission analyzes the passthroughs (discounts divided by cost avoidances). In its filing, the Postal Service identifies one planned discount (Automation 5-Digit Flats) within First-Class Mail that has a passthrough exceeding 100 percent. *Id.*

Automation 5-Digit Flats. The Postal Service calculates the passthrough of avoided costs for Automation 5-Digit Flats as 126.3 percent. Notice, Excel file (Attachment B), Worksheet FCM Flats. The Postal Service's proposal increases the discount from 18.3 to 19.2 cents. *Id.* at 45.

²³ Library Reference PRC-LR-2015-4/1 contains one Excel workbook file that presents the compliance calculations for First-Class Mail. Library Reference PRC-LR-R2015-4/2 contains two Excel workbook files. One file calculates the percentage change in price for the Outbound Single-Piece First-Class Mail International product, while the other calculates the percentage change in price for the Inbound Letter Post product in redacted form. Library Reference PRC-LR-R2015-4/NP1 contains one Excel workbook file that presents all the Inbound Letter Post price change calculations without redaction.

The Postal Service asserts the Automation 5-Digit Flats discount is permissible, pursuant to 39 U.S.C. § 3622(e)(2)(B), to mitigate rate shock. *Id.* The Postal Service states that reducing the discount to the level of avoided cost would lead to a 14.1 percent increase for Automation 5-Digit Flats. Responses to CHIR No. 2, question 1. It maintains that retaining the discount at 18.3 cents would cause the Automation 5-Digit Flats price to increase by 6.7 percent. *Id.* The Postal Service contends that either of those increases would far exceed the increases for the less presorted Automation Flats mail categories as well as the overall increase for First-Class Mail. *Id.*

Comments on Automation 5-Digit Flats workshare discount. NPPC and the Public Representative commented on the Postal Service's planned Automation 5-Digit Flats discount. According to NPPC, "[t]he pass-through for the Automation 5-Digit Flats discount is necessary to avoid the rate shock that would result from an increase of some 14.7 percent if the discount were set at the avoided costs estimated in the FY2014 Annual Compliance Report." NPPC Comments at 3; *see also id.* at 12-15. Conversely, the Public Representative contends that the Postal Service's purported justification for the discount is insufficient. PR Comments at 7. He adds, "[a]t a minimum, the Postal Service should not be allowed to increase a discount w[h]ere it states its goal is to decrease the discount." *Id.* at 8.

Commission analysis. The Commission concludes that the Postal Service has adequately explained why the First-Class Mail Automation 5-Digit Flats worksharing discount is justified by 39 U.S.C. § 3622(e)(2)(B). *See* Responses to CHIR No. 2, question 1 (explaining that maintaining the current discount for Automation 5-Digit Flats would lead to rate shock). Although the Postal Service plans to increase the discount between Automation 3-Digit Flats and Automation 5-Digit Flats, the recent increases for 5-Digit Automation Flats have been exceptionally large. In less than a year, these have included an above average increase of 3.2 percent in Docket No. R2013-10 and an above average exigent price increase of 7.6 percent in Docket No. R2013-11. Moreover, due to an increase in avoided costs from FY 2013 to FY 2014, the proposed 126 percent passthrough for Automation 5-Digit Flats represents a decrease from the

FY 2013 passthrough of 133 percent. In this unusual set of circumstances, the Commission accepts the application of the rate shock exception. The Commission anticipates that, consistent with the requirements of the statutory exception for rate shock, the discount for First-Class Mail Automation 5-Digit Flats will be reduced over time to the amount of costs avoided. The Commission will examine this issue further as part of its FY 2015 Annual Compliance Determination.

Comments on Automation 5-Digit Letters workshare discount. In addition, the Commission received several comments on the below 100 percent passthrough for Automation 5-Digit Letters. NPPC argues that the Commission should order a 100 percent passthrough for that price category because the Postal Service did not adequately explain why the discount was set “substantially” below 100 percent of avoided costs. NPPC Comments at 11. NAPM argues that the price “fails to reward efficiency.” NAPM Comments at 4. Pitney Bowes argues that setting the Automation 5-Digit Letters discount below avoided costs is inconsistent with the objectives and factors of the Postal Accountability and Enhancement Act (PAEA) and recommends that the Postal Service revisit the presort rate design in the next rate adjustment. Pitney Bowes Comments at 3-4.

Commission analysis. The Commission concludes that the First-Class Mail planned price adjustments are consistent with the worksharing requirements of title 39, which impose a ceiling but not a floor on passthroughs. See 39 U.S.C. § 3622(e)(2). The Commission notes that passthroughs below 100 percent may send inefficient price signals to mailers and therefore encourages the Postal Service to adjust discounts to bring passthroughs closer to 100 percent.

C. Classification Changes (Promotions)

The Postal Service proposes to offer three First-Class Mail promotions during CY 2015 and describes the promotions in its proposed changes to the MCS. Notice at

53; *id.* at Attachment A, Part II, Sections 1110.4, 1110.5, 1115.4, and 1115.5. There are no other significant changes to the MCS with respect to First-Class Mail products.²⁴

Promotional pricing. The Postal Service proposes to offer three seasonal pricing promotions within First-Class Mail: (1) Earned Value Reply Mail Promotion (May to July 31, 2015); (2) Advanced and Emerging Technology Promotion (May to October 31, 2015); and (3) Color Transpromo Promotion (June to November 30, 2015). Notice at 7-8.

Earned Value Reply Mail Promotion. The Earned Value Reply Mail Promotion provides a per-piece rebate on Business Reply Mail and Courtesy Reply Mail pieces that are returned to the registered customer during the promotional period. Notice, Attachment D at 2. Mailers who participated in the 2014 Earned Value Reply Mail Promotion and whose total Business Reply Mail and Courtesy Reply Mail volume increases in 2015 will receive a 3 cent rebate per piece. *Id.* Other mailers will receive a 2 cent rebate per piece. *Id.* The rebate will be calculated at the end of the promotional period and will be applied to the mailer's permit imprint account. *Id.* The Postal Service includes volumes and prices for this promotion in its price cap calculation.

Advanced and Emerging Technology Promotion. The Advanced and Emerging Technology Promotion provides a 2 percent discount on First-Class Presort and Automation Letters, Cards, and Flats that incorporate advanced print technology such as innovations in paper and ink, the use of standard NFC (near field communication) technology or an "advanced" or "enhanced" augmented reality experience allowing the recipient to engage in an interactive experience. *Id.* at 3. The Postal Service includes volumes and prices for this promotion in its price cap calculation.

Color Transpromo Promotion. The Color Transpromo Promotion provides mailers a 2 percent discount on First-Class Presort and Automation Letters that use dynamic/variable color print for marketing messages on their bills and statements. *Id.*

²⁴ The Postal Service removes the Repositionable Notes optional feature from Presorted Letters and Flats. The Postal Service also proposes removing Restricted Delivery and modifying International Return Receipt. These changes will be analyzed in a subsequent order by the Commission discussing the proposals relating to the Special Services class.

at 1. The Postal Service characterizes this promotion as a continuation of a similar promotion approved in Docket No. R2013-10. *Id.* It includes volumes and prices for this promotion in its price cap calculation.

Comments on promotional pricing. NAPM and Pitney Bowes commend the Postal Service for providing advanced notice of promotions for CY 2015. NAPM Comments at 5; Pitney Bowes Comments at 1, 6. In addition, NAPM requests the Postal Service “leverage its pricing flexibility and incentives to encourage broader use of these promotions.” NAPM Comments at 5.

Commission analysis. The Commission concludes that the Postal Service’s inclusion of the above-referenced promotions in the price cap calculation for First-Class Mail is consistent with 39 C.F.R. § 3010.23(e)(2).²⁵ The Commission approves the Postal Service’s proposed changes to the MCS.

D. General Comments on Planned Prices

Price differential between stamped and metered letters. Several commenters addressed the issue of whether the price differential between stamped and metered letters is justified.²⁶ Stamps.com argues that a 50 percent reduction in a new discount sends a “counterproductive” message to mailers. Stamps.com Comments at 3. It also remarks that “[t]here needs to be recognition of the importance of avoiding gyrations of this magnitude.” *Id.* Pitney Bowes also argues that the price differential should be increased, or at a minimum restored to one cent, in the next price adjustment “to encourage small and medium-sized mailers to continue to use mail to manage and grow their businesses.” Pitney Bowes Comments at 1; *see also id.* at 4-6. GCA, however,

²⁵ See Docket No. RM2014-3, Order Adopting Final Rules on the Treatment of Rate Incentives and De Minimis Rate Increases for Price Cap Purposes, June 3, 2014 (Order No. 2086).

²⁶ Currently, the price for Single-Piece Stamped Letters is one cent more than the price for Single-Piece Metered Letters. MCS, Section 1105.5. The Postal Service’s plan is to maintain the price of a one-ounce Single-Piece Stamped Letter at 49 cents, while increasing the price of a one-ounce Single-Piece Metered Letter from 48 to 48.5 cents. Notice, Attachment A, Part II, Section 1105.5. As a result of this plan, the price difference between stamped and metered letters would decrease from one cent to one-half cent.

finds the price differential between metered and stamped letters to be “unjustified.” GCA Comments at 1, n.1 (referring to Docket No. ACR2014, Initial Comments of the Greeting Card Association, February 2, 2015).

Commission analysis. Subject to certain limitations, most prominently the price cap, the PAEA gives the Postal Service pricing flexibility to distribute inflation-based increases within First-Class Mail. The Postal Service has complied with the applicable statutory and regulatory requirements. The Commission encourages the Postal Service to continue to collaborate with mailers and consider mailer concerns.

Disproportionate increase for commercial mailers. The Commission received several comments arguing that commercial mailers were to receive disproportionately high price increases. See NAPM Comments at 3; NPPC Comments at 3-10; Pitney Bowes Comments at 1. NPPC specifically raises the issue of whether the planned price increases for First-Class Presort Letters are: (1) in violation of the prohibition against unreasonable discrimination in rates; and (2) out of alignment with the PAEA’s objective of a just and reasonable schedule for rates. NPPC Comments at 3. NPPC argues that the Postal Service’s planned prices for Presort Letters violate 39 U.S.C. § 403(c) because they unreasonably discriminate against business mailers. *Id.* at 6. In addition, NPPC argues “that where a rate schedule has caused one product – First-Class Presort Letters and Cards – to have a cost coverage that persistently and repeatedly greatly exceeds the system-wide average over a period of many years, a *new* rate increase that disproportionately targets only that product is not just and reasonable.” *Id.* at 9 (emphasis in original). NPPC acknowledges that unequal price changes are not a *per se* violation of 39 U.S.C. § 3622(b)(8), but argues that “allowing unequal rate changes in a limited sense does not mean that they can, or should, be permitted to be repeated to the point that they become an annual pattern to the detriment of the same mail product.” *Id.* at 10.

NAPM comments that “the prices proposed for First-Class Mail letters send the wrong signals; they penalize the commercial mail user, the presorted mail, rather than reward it.” NAPM Comments at 3. It is “concerned that these prices will discourage the

use of more efficient and more profitable presort mail and drive them towards e-delivery solutions at a quicker pace.” *Id.*

Commission analysis. Subject to certain limitations, most prominently the price cap, the PAEA gives the Postal Service pricing flexibility to distribute inflation-based increases within First-Class Mail. As NPPC itself recognizes, 39 U.S.C. § 3622(b)(8) “was enacted specifically to permit the Postal Service some flexibility on rates within classes.” NPPC Comments at 10. The Commission notes that 39 U.S.C. § 3622(b)(8) explicitly states that the objective of maintaining “a just and reasonable schedule for rates and classifications . . . shall not be construed to prohibit the Postal Service from making changes of unequal magnitude within, between, or among classes of mail.” 39 U.S.C. § 3622(b)(8). Regarding NPPC’s allegation that the Postal Service is in violation of 39 U.S.C. § 403(c), this is not a matter for consideration in this proceeding.

Full Service Intelligent Mail. NAPM comments that it supports the Postal Service’s decision to maintain the discount for First-Class Mail letters that meet the requirements for Full Service Intelligent Mail barcode (FS IMb). NAPM Comments at 4. It argues that the Postal Service “should use its pricing flexibility to promote the full adoption of FS IMb by increasing the incentive for First-Class [Mail].” *Id.*

Commission analysis. The Commission encourages the Postal Service to continue to use its pricing flexibility to create incentives that benefit both mailers and the Postal Service.

E. International First-Class Mail

Introduction. There are two international mail products within First-Class Mail: (1) Outbound Single-Piece First-Class Mail International; and (2) Inbound Letter Post. Outbound Single-Piece First-Class Mail International consists of letters, flats, and cards. The Inbound Letter Post product is similar in content to domestic First-Class Mail, Periodicals, Standard Mail, Bound Printed Matter, and Media/Library Mail, weighing up to 4.4 pounds (2.0 kilograms).

Table III-2 shows the planned increases for Outbound Single-Piece First-Class Mail International (including several price categories) and Inbound Letter Post, with revisions to the Inbound Letter Post price change based on the application of the Commission's accepted methodology.

Table III-2

International First-Class Mail Price Changes²⁷

International First-Class Mail Products	Price Change %
Outbound Single-Piece First-Class Mail International	
Letters and Flats	4.389
Cards	4.545
Nonmachinable Surcharge	5.000
Total	4.399
Inbound Letter Post	1.708
Source: Library Reference PRC-LR-R2015-4/2.	

Outbound Single-Piece First-Class Mail International. The Postal Service plans a price increase of 4.399 percent for Outbound Single-Piece First-Class Mail International. Notice at 20. This increase reflects, among other things, a 5 cent increase in the price for both Outbound Single-Piece First-Class Mail International machinable letters and postcards and a one cent increase in the non-machinable surcharge for Outbound Single-Piece First-Class Mail International letters.²⁸

²⁷ The percentage price changes in Table III-2 are calculated by comparing the base prices established by Docket No. R2013-10 to the prices resulting from this Order, prior to the application of the exigent surcharge.

²⁸ The price for an International Forever Stamp, which is linked to the new price for an Outbound Single-Piece First-Class Mail International first-ounce machinable letter, will also increase. See Notice, Attachment A, Parts I and II, Section 1105.5, note 1.

The Postal Service observes that the price increases for letters and flats within the Outbound Single-Piece First-Class Mail International product is "significantly greater" than the First-Class Mail average price increase of 1.949 percent. Notice at 20. It asserts that this above-average price increase is necessary to maintain contribution and improve cost coverage for Outbound Single-Piece First-Class Mail International letters and flats. *Id.*

Inbound Letter Post. The Postal Service does not independently establish prices for delivering Inbound Letter Post as it does for Outbound Single-Piece First-Class Mail International or the other First-Class Mail products addressed in this Order. Instead, Inbound Letter Post prices, referred to as terminal dues, are determined each calendar year according to a Universal Postal Union (UPU) formula established in the Universal Postal Convention.²⁹ However, Inbound Letter Post prices factor into the price cap calculation for First-Class Mail because Inbound Letter Post is a First-Class Mail product.

Accordingly, the Postal Service calculates a price increase of 1.277 percent for Inbound Letter Post using CY 2014 and CY 2015 UPU terminal dues rates and FY 2014 inbound volumes and kilograms by country presented in the International Cost and Revenue Analysis (ICRA) report.³⁰ The Postal Service's price change calculations differ in minor respects from the Commission's accepted methodology for calculating the price change for Inbound Letter Post. See Library Reference PRC-LR-2015-4/NP1. These differences include the use of terminal dues rates for two countries reflecting outdated UPU country classifications and references to incorrect rates in several calculations.

Commission analysis. The Commission approves the Postal Service's planned price changes for the Outbound Single-Piece First-Class Mail International product.

²⁹ Terminal dues refer to payments by foreign postal operators to the Postal Service for delivery of Inbound Letter Post in the United States.

³⁰ For volumes, see Docket No. ACR2014, Library Reference USPS-FY14-NP2, December 29, 2014, Excel file Reports.xls, Worksheet ICRA Database. For CY 2014 and CY 2015 terminal dues rates, see International Bureau (IB) Circular 111, July 1, 2013, and IB Circular 112, June 30, 2014, respectively.

The Postal Service's price change calculations for Outbound Single-Piece First-Class Mail International letters, cards, and flats, based on the FY 2014 billing determinants and the current and adjusted prices, conform to the Commission's accepted methodology.³¹

The Commission accepts the Postal Service's calculations for Inbound Letter Post with minor modifications. In the Responses to CHIR No. 3, the Postal Service confirmed the updated terminal dues rates for two countries and the correct rates for the other calculations.³² The Commission also revises the calculation of internal air conveyance revenues to use air kilograms for Inbound Letter Post transported by air rather than total kilograms, which include air and surface kilograms. See Library Reference PRC-LR-R2015-4/NP1.

Applying the accepted methodology results in a price change of 1.708 percent for Inbound Letter Post compared to 1.277 percent calculated by the Postal Service. This revised price increase has a minimal impact on the overall percentage change in price for First-Class Mail as a whole.³³

IV. ORDERING PARAGRAPHS

It is ordered:

1. The Commission finds that the Postal Service's planned price adjustments relating to First-Class Mail as identified in the United States Postal Service Notice of Market Dominant Price Adjustment, filed January 15, 2015, are consistent with 39 U.S.C. §§ 3622(d) and 3622(e), and may take effect, as planned.

³¹ Market Dominant International Billing Determinants are one of several Postal Service periodic reports that provide information on the financial or operational status of the Postal Service. Periodic reports are generally filed with the Commission on a quarterly or monthly basis. See 39 C.F.R. part 3050—Periodic Reporting.

³² See Responses to CHIR No. 3, questions 1-2.

³³ Compare Library Reference USPS-LR-R2015-4/1, January 15, 2015, with Library Reference PRC-LR-R2015-4/1.

2. Revisions to the Mail Classification Schedule appear below the signature of this Order and are effective April 26, 2015.

By the Commission.

Shoshana M. Grove
Secretary

CONCURRING OPINION OF COMMISSIONER RUTH Y. GOLDWAY

The limited statutory timeframe allotted for price adjustments of market dominant products is ill-suited to resolving allegations of unreasonable discrimination, or an unjust or unreasonable schedule for rates, that may constitute a violation of 39 U.S.C. § 403(c) or the provisions of Chapter 36 of Title 39.

I think it is essential that given this time limitation, the Commission point out to any interested parties that other types of dockets, such as the section 3662 complaint process, are available and are better structured to hear such allegations.

Ruth Y. Goldway

CHANGES TO THE MAIL CLASSIFICATION SCHEDULE

The following material represents a change to the Mail Classification Schedule. The Commission uses two main conventions when making changes to the Mail Classification Schedule. New text is underlined. Deleted text is struck through.

*First-Class Mail
Single-Piece Letters/Postcards*

Part A—Market Dominant Products

1100 First-Class Mail

1105 Single-Piece Letters/Postcards

1105.5 Prices

Single-Piece Machinable Stamped Letters^{1,2}

Maximum Weight (ounces)	Machinable Letters (\$)
1	0.49
2	<u>0.71</u>
3	<u>0.93</u>
3.5	<u>1.15</u>

Single-Piece Machinable Metered Letters

Maximum Weight (ounces)	Machinable Letters (\$)
1	<u>0.485</u>
2	<u>0.705</u>
3	<u>0.925</u>
3.5	<u>1.145</u>

*First-Class Mail
Single-Piece Letters/Postcards*

Single-Piece Nonmachinable Stamped Letters

Maximum Weight (ounces)	Nonmachinable Letters (\$)
1	<u>0.71</u>
2	<u>0.93</u>
3	<u>1.15</u>
3.5	<u>1.37</u>

Single-Piece Nonmachinable Metered Letters

Maximum Weight (ounces)	Nonmachinable Letters (\$)
1	<u>0.705</u>
2	<u>0.925</u>
3	<u>1.145</u>
3.5	<u>1.365</u>

Single-Piece QBRM Letters

Maximum Weight (ounces)	QBRM Letters (\$)
1	<u>0.476</u>
2	<u>0.696</u>

Single-Piece Residual Machinable Letters

Maximum Weight (ounces)	Residual Machinable Letters (\$)
1	0.50 ¹
2	0.50 ¹
3	<u>0.925</u>
3.5	<u>1.145</u>

*First-Class Mail
Single-Piece Letters/Postcards*

* * * * *

Single-Piece Postcards^{1,2}

Maximum Weight (ounces)	Postcards (\$)	Single-Piece Double Card (\$)
not applicable	<u>0.35</u>	<u>0.70</u>

* * * * *

Single-Piece QBRM Postcards

Maximum Weight (ounces)	QBRM Postcards (\$)
not applicable	<u>0.339</u>

Alternate Postage Letters and Postcards¹

Maximum Weight (ounces)	Upfront Postage Payment² (\$)	Alternate Postage Letters (\$)	Alternate Postage Postcards (\$)
1	Below 21%	<u>\$0.57</u>	<u>\$0.42</u>
	21 – 50%	\$0.55	\$0.40
	Over 50%	\$0.54	\$0.39

* * * * *

*First-Class Mail
Presorted Letters/Postcards*

1110 Presorted Letters/Postcards

* * * * *

1110.4 Optional Features

The following additional postal services may be available in conjunction with the product specified in this section:

* * * * *

- ~~Repositionable Notes: Presorted Letters Only~~
- Advanced and Emerging Technology Promotion (May 1, 2015 to October 31, 2015)
- ~~Branded Color Mobile Technology Promotion (February 1, 2014 to March 31, 2014)~~
- ~~Earned Value Reply Mail Promotion (April-May 1, 2014-2015 to June July 31, 2014-2015)~~
- ~~Color Transpromo Printing in First-Class Mail Transactions Promotion (April June 1, 2015-2014 to December November 30, 2015-2014)~~
- ~~Premium Advertising Promotion (April 1, 2014 to June 30, 2014)~~
- ~~Mail and Digital Personalization Promotion (May 1, 2014 to June 30, 2014)~~

*First-Class Mail
Presorted Letters/Postcards*

1110.5 Prices

Automation Letters

Maximum Weight (ounces)	5-Digit (\$)	3-Digit (\$)	AADC (\$)	Mixed AADC (\$)
1	<u>0.391</u>	<u>0.416</u>	<u>0.416</u>	<u>0.439</u>
2	<u>0.391</u>	<u>0.416</u>	<u>0.416</u>	<u>0.439</u>
3	<u>0.651</u>	<u>0.676</u>	<u>0.676</u>	<u>0.699</u>
3.5	<u>0.781</u>	<u>0.806</u>	<u>0.806</u>	<u>0.829</u>

Nonautomation Presorted Machinable Letters

Maximum Weight (ounces)	Presorted (\$)
1	<u>0.471</u>
2	<u>0.471</u>
3	<u>0.731</u>
3.3	<u>0.861</u>

Nonmachinable Letters

Maximum Weight (ounces)	Presorted (\$)
1	<u>0.689</u>
2	<u>0.689</u>
3	<u>0.949</u>
3.5	<u>1.079</u>

*First-Class Mail
Presorted Letters/Postcards*

Automation Postcards

Maximum Weight (ounces)	5-Digit (\$)	3-Digit (\$)	AADC (\$)	Mixed AADC (\$)
not applicable	<u>0.260</u>	<u>0.275</u>	<u>0.275</u>	<u>0.284</u>

Nonautomation Presorted Machinable Postcards

Maximum Weight (ounces)	Presorted (\$)
not applicable	<u>0.295</u>

* * * * *

Letters including a Repositionable Note

Add ~~\$0.000~~ for each presorted letter bearing a Repositionable Note.

* * * * *

Branded Color Mobile Technology Promotion (February 1, 2014 to March 31, 2014)

Provide a two percent discount on the qualifying postage for First-Class Mail presort or automation letters, postcards, and flats sent during the established program period, and which include print mobile technology (such as QR Code) with creative elements including color and graphics, inside or on the mailpiece. To receive the discount, mailers must comply with the eligibility requirements of the program.

Advanced and Emerging Technology Promotion (May 1, 2015 to October 31, 2015)

Provide a two percent discount on the qualifying postage for First-Class Mail and Standard Mail presort or automation letters, postcards, and flats that are sent during the established program period, and which include affixed or embedded technology that allows the recipient to engage in an experience facilitated via Near Field Communication, or other qualifying emerging technology leading to a mobile experience. To receive the discount, mailers must comply with the eligibility requirements of the program.

*First-Class Mail
Presorted Letters/Postcards*

Earned Value Reply Mail Promotion (April ~~May~~ 1, 2014 2015 to ~~June~~ July 31~~0~~, 2014 2015)

Provide a \$0.02 or \$0.03 per piece rebate on all Business Reply Mail and Courtesy Reply Mail pieces that meet program requirements and are returned to the registered customer during the program period. To receive the rebate, registered customers must have mailed out pieces that included a Business Reply Mail or Courtesy Reply Mail envelope, and comply with all other eligibility requirements of the program. To qualify for the \$0.03 per piece rebate, a mailer must have participated in the 2014~~3~~ Earned Value Promotion and increase their volume of qualifying Business Reply Mail/Courtesy Reply Mail pieces in 2015~~4~~.

Color Transpromo Printing in First-Class Mail Transactions Promotion (April ~~June~~ 1, 2015-2014 to ~~December~~ November 30~~1~~, 2015-2014)

* * * * *

Premium Advertising Promotion (April 1, 2014 to June 30, 2014)

~~Provide a 15 percent discount on qualifying postage for First-Class Mail automation letters and cards sent as part of a full-service IMb mailing during the established program period, which consist entirely of marketing or advertising content. Mailings may not contain any material required to be mailed as First-Class Mail. To receive the discount, mailers must meet all minimum volume requirements and eligibility requirements of the program.~~

Mail and Digital Personalization Promotion (May 1, 2014 to June 30, 2014)

~~Provide a two percent discount on the qualifying postage for First-Class Mail presort and automation letters, cards, and flats and Standard Mail letters and flats sent during the established program period, and which include print mobile technology leading the recipient to a customized or personalized URL, and webpage, creating a mobile experience that offers relevant messaging and content. The mailpiece itself must also be customized to the recipient. To receive the discount, mailers must comply with the eligibility requirements of the program.~~

*First-Class Mail
Flats*

1115 Flats

1115.4 Optional Features

The following additional postal services may be available in conjunction with the product specified in this section:

- ~~Repositionable Notes~~
- Advanced and Emerging Technology Promotion (May 1, 2015 to October 31, 2015)
- ~~Branded Color Mobile Technology Promotion (February 1, 2014 to March 31, 2014)~~
- ~~Mail and Digital Personalization Promotion (May 1, 2014 to June 30, 2014)~~

1115.5 Prices

Automation Flats

Maximum Weight (ounces)	5-Digit (\$)	3-Digit (\$)	ADC (\$)	Mixed ADC (\$)
1	<u>0.470</u>	<u>0.662</u>	<u>0.702</u>	0.782
2	<u>0.688</u>	<u>0.880</u>	<u>0.920</u>	<u>1.00</u>
3	<u>0.906</u>	<u>1.098</u>	<u>1.138</u>	<u>1.218</u>
4	<u>1.124</u>	<u>1.316</u>	<u>1.356</u>	<u>1.436</u>
5	<u>1.342</u>	<u>1.534</u>	<u>1.574</u>	<u>1.654</u>
6	<u>1.560</u>	<u>1.752</u>	<u>1.792</u>	<u>1.872</u>
7	<u>1.778</u>	<u>1.970</u>	<u>2.01</u>	<u>2.090</u>
8	<u>1.996</u>	<u>2.188</u>	<u>2.228</u>	<u>2.308</u>
9	<u>2.214</u>	<u>2.406</u>	<u>2.446</u>	<u>2.526</u>
10	<u>2.432</u>	<u>2.624</u>	<u>2.664</u>	<u>2.744</u>
11	<u>2.650</u>	<u>2.842</u>	<u>2.882</u>	<u>2.962</u>
12	<u>2.868</u>	<u>3.060</u>	<u>3.100</u>	<u>3.180</u>
13	<u>3.086</u>	<u>3.278</u>	<u>3.318</u>	<u>3.398</u>

*First-Class Mail
Flats**Presorted Flats*

Maximum Weight (ounces)	Presorted (\$)
1	<u>0.831</u>
2	<u>1.049</u>
3	<u>1.267</u>
4	<u>1.485</u>
5	<u>1.703</u>
6	<u>1.921</u>
7	<u>2.139</u>
8	<u>2.357</u>
9	<u>2.575</u>
10	<u>2.793</u>
11	<u>3.011</u>
12	<u>3.229</u>
13	<u>3.447</u>

*First-Class Mail
Flats*

Single-Piece Flats¹

Maximum Weight (ounces)	Single-Piece (\$)
1	\$0.98
2	<u>\$1.20</u>
3	<u>\$1.42</u>
4	<u>\$1.64</u>
5	<u>\$1.86</u>
6	<u>\$2.08</u>
7	<u>\$2.30</u>
8	<u>\$2.52</u>
9	<u>\$2.74</u>
10	<u>\$2.96</u>
11	<u>\$3.18</u>
12	<u>\$3.40</u>
13	<u>\$3.62</u>

* * * * *

Flats including a Repositionable Note

~~Add \$0.000 for each piece bearing a Repositionable Note.~~

* * * * *

Advanced and Emerging Technology Promotion (May 1, 2015 to October 31, 2015)

Provide a two percent discount on the qualifying postage for First-Class Mail and Standard Mail presort or automation letters, postcards, and flats that are sent during the established program period, and which include affixed or embedded technology that allows the recipient to engage in an experience facilitated via Near Field Communication, or other qualifying emerging technology leading to a mobile experience. To receive the discount, mailers must comply with the eligibility requirements of the program.

*First-Class Mail
Flats*

~~*Branded Color Mobile Technology Promotion (February 1, 2014 to March 31, 2014)*~~

~~Provide a two percent discount on the qualifying postage for First-Class Mail presort or automation letters, postcards, and flats sent during the established program period, and which include print mobile technology (such as QR Code) with creative elements including color and graphics, inside or on the mailpiece. To receive the discount, mailers must comply with the eligibility requirements of the program.~~

~~*Mail and Digital Personalization Promotion (May 1, 2014 to June 30, 2014)*~~

~~Provide a two percent discount on the qualifying postage for First-Class Mail presort and automation letters, cards, and flats sent during the established program period, and which include customized URLs, websites, or mobile experiences that offer relevant messaging and content. To receive the discount, mailers must comply with the eligibility requirements of the program.~~

*First-Class Mail
Parcels*

1120 Parcels

* * * * *

1120.5 Prices

Retail¹

Maximum Weight (ounces)	Single-Piece (\$)
1	<u>\$2.54</u>
2	<u>\$2.54</u>
3	<u>\$2.54</u>
4	<u>\$2.74</u>
5	<u>\$2.94</u>
6	<u>\$3.14</u>
7	<u>\$3.34</u>
8	<u>\$3.54</u>
9	<u>\$3.74</u>
10	<u>\$3.94</u>
11	<u>\$4.14</u>
12	<u>\$4.34</u>
13	<u>\$4.54</u>

* * * * *

*First-Class Mail
Parcels**Keys and Identification Devices*

Maximum Weight (ounces)	Keys and Identification Devices (\$)
1	<u>\$3.39</u>
2	<u>\$3.39</u>
3	<u>\$3.39</u>
4	<u>\$3.59</u>
5	<u>\$3.79</u>
6	<u>\$3.99</u>
7	<u>\$4.19</u>
8	<u>\$4.39</u>
9	<u>\$4.59</u>
10	<u>\$4.79</u>
11	<u>\$4.99</u>
12	<u>\$5.19</u>
13	<u>\$5.39</u>
1 (pound)	Priority Mail Retail Zone 4 postage plus <u>\$0.85</u>
2 (pounds)	Priority Mail Retail Zone 4 postage plus <u>\$0.85</u>

*First-Class Mail
Inbound Letter Post*

1125 Outbound Single-Piece First-Class Mail International

1125.6 Prices

Machinable Letters¹

Maximum Weight (ounces)	Country Price Group								
	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
1	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>
2	<u>1.20</u>	<u>1.79</u>	<u>2.21</u>	<u>2.21</u>	<u>2.21</u>	<u>2.06</u>	<u>2.06</u>	<u>2.06</u>	<u>2.06</u>
3	<u>1.67</u>	<u>2.38</u>	<u>3.24</u>	<u>3.24</u>	<u>3.24</u>	<u>2.92</u>	<u>2.92</u>	<u>2.92</u>	<u>2.92</u>
3.5	<u>2.16</u>	<u>2.97</u>	<u>4.27</u>	<u>4.27</u>	<u>4.27</u>	<u>3.78</u>	<u>3.78</u>	<u>3.78</u>	<u>3.78</u>

Nonmachinable Letters

Maximum Weight (ounces)	Country Price Group								
	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
1	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>	<u>1.42</u>
2	<u>1.42</u>	<u>2.01</u>	<u>2.43</u>	<u>2.43</u>	<u>2.43</u>	<u>2.28</u>	<u>2.28</u>	<u>2.28</u>	<u>2.28</u>
3	<u>1.89</u>	<u>2.60</u>	<u>3.46</u>	<u>3.46</u>	<u>3.46</u>	<u>3.14</u>	<u>3.14</u>	<u>3.14</u>	<u>3.14</u>
3.5	<u>2.38</u>	<u>3.19</u>	<u>4.49</u>	<u>4.49</u>	<u>4.49</u>	<u>4.00</u>	<u>4.00</u>	<u>4.00</u>	<u>4.00</u>

Postcards

Maximum Weight (ounces)	Canada (\$)	Mexico (\$)	All Other Countries (\$)
not applicable	<u>1.20</u>	<u>1.20</u>	<u>1.20</u>

*First-Class Mail
Inbound Letter Post*

Large Envelopes (Flats)

Maximum Weight (ounces)	Country Price Group								
	1 (\$)	2 (\$)	3 (\$)	4 (\$)	5 (\$)	6 (\$)	7 (\$)	8 (\$)	9 (\$)
1	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>	<u>2.38</u>
2	<u>2.60</u>	<u>3.09</u>	<u>3.36</u>	<u>3.36</u>	<u>3.36</u>	<u>3.31</u>	<u>3.31</u>	<u>3.31</u>	<u>3.31</u>
3	<u>2.82</u>	<u>3.78</u>	<u>4.32</u>	<u>4.32</u>	<u>4.32</u>	<u>4.22</u>	<u>4.22</u>	<u>4.22</u>	<u>4.22</u>
4	<u>3.02</u>	<u>4.49</u>	<u>5.30</u>	<u>5.30</u>	<u>5.30</u>	<u>5.13</u>	<u>5.13</u>	<u>5.13</u>	<u>5.13</u>
5	<u>3.24</u>	<u>5.20</u>	<u>6.28</u>	<u>6.28</u>	<u>6.28</u>	<u>6.06</u>	<u>6.06</u>	<u>6.06</u>	<u>6.06</u>
6	<u>3.46</u>	<u>5.89</u>	<u>7.24</u>	<u>7.24</u>	<u>7.24</u>	<u>6.97</u>	<u>6.97</u>	<u>6.97</u>	<u>6.97</u>
7	<u>3.68</u>	<u>6.60</u>	<u>8.22</u>	<u>8.22</u>	<u>8.22</u>	<u>7.90</u>	<u>7.90</u>	<u>7.90</u>	<u>7.90</u>
8	<u>3.90</u>	<u>7.31</u>	<u>9.20</u>	<u>9.20</u>	<u>9.20</u>	<u>8.81</u>	<u>8.81</u>	<u>8.81</u>	<u>8.81</u>
12	<u>4.98</u>	<u>8.81</u>	<u>11.14</u>	<u>11.14</u>	<u>11.14</u>	<u>10.72</u>	<u>10.72</u>	<u>10.72</u>	<u>10.72</u>
16	<u>6.06</u>	<u>10.33</u>	<u>13.10</u>	<u>13.10</u>	<u>13.10</u>	<u>12.61</u>	<u>12.61</u>	<u>12.61</u>	<u>12.61</u>
20	<u>7.14</u>	<u>11.85</u>	<u>15.04</u>	<u>15.04</u>	<u>15.04</u>	<u>14.50</u>	<u>14.50</u>	<u>14.50</u>	<u>14.50</u>
24	<u>8.22</u>	<u>13.37</u>	<u>16.98</u>	<u>16.98</u>	<u>16.98</u>	<u>16.39</u>	<u>16.39</u>	<u>16.39</u>	<u>16.39</u>
28	<u>9.30</u>	<u>14.87</u>	<u>18.94</u>	<u>18.94</u>	<u>18.94</u>	<u>18.28</u>	<u>18.28</u>	<u>18.28</u>	<u>18.28</u>
32	<u>10.38</u>	<u>16.39</u>	<u>20.88</u>	<u>20.88</u>	<u>20.88</u>	<u>20.17</u>	<u>20.17</u>	<u>20.17</u>	<u>20.17</u>
36	<u>11.46</u>	<u>17.91</u>	<u>22.84</u>	<u>22.84</u>	<u>22.84</u>	<u>22.08</u>	<u>22.08</u>	<u>22.08</u>	<u>22.08</u>
40	<u>12.56</u>	<u>19.43</u>	<u>24.78</u>	<u>24.78</u>	<u>24.78</u>	<u>23.97</u>	<u>23.97</u>	<u>23.97</u>	<u>23.97</u>
44	<u>13.64</u>	<u>20.93</u>	<u>26.72</u>	<u>26.72</u>	<u>26.72</u>	<u>25.86</u>	<u>25.86</u>	<u>25.86</u>	<u>25.86</u>
48	<u>14.72</u>	<u>22.45</u>	<u>28.68</u>	<u>28.68</u>	<u>28.68</u>	<u>27.75</u>	<u>27.75</u>	<u>27.75</u>	<u>27.75</u>
52	<u>15.80</u>	<u>23.97</u>	<u>30.62</u>	<u>30.62</u>	<u>30.62</u>	<u>29.64</u>	<u>29.64</u>	<u>29.64</u>	<u>29.64</u>
56	<u>16.88</u>	<u>25.49</u>	<u>32.56</u>	<u>32.56</u>	<u>32.56</u>	<u>31.55</u>	<u>31.55</u>	<u>31.55</u>	<u>31.55</u>
60	<u>17.96</u>	<u>26.99</u>	<u>34.52</u>	<u>34.52</u>	<u>34.52</u>	<u>33.44</u>	<u>33.44</u>	<u>33.44</u>	<u>33.44</u>
64	<u>19.04</u>	<u>28.51</u>	<u>36.46</u>	<u>36.46</u>	<u>36.46</u>	<u>35.33</u>	<u>35.33</u>	<u>35.33</u>	<u>35.33</u>

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