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

RATE ADJUSTMENT DUE TO EXTRAORDINARY OR EXCEPTIONAL CIRCUMSTANCES	)))	Docket No. R2013-11R

INITIAL COMMENTS OF
ASSOCIATION FOR POSTAL COMMERCE,
MPA—THE ASSOCIATION OF MAGAZINE MEDIA,
ALLIANCE OF NONPROFIT MAILERS,
DIRECT MARKETING ASSOCIATION, INC.,
AMERICAN CATALOG MAILERS ASSOCIATION,
ENVELOPE MANUFACTURERS ASSOCIATION,
EPICOMM,
MAJOR MAILERS ASSOCIATION,
NATIONAL NEWSPAPER ASSOCIATION
AND SATURATION MAILERS COALITION
ON REMAND

(JUNE 26, 2015)

The undersigned mailer parties submit these initial comments in response to Order No. 2540, which reopened this docket for further proceedings in response to the June 5 decision of the Court of Appeals in *Alliance of Nonprofit Mailers v. PRC*, 2015 WL 3513394 (D.C. Cir., June 5, 2015). In its decision and order, the court vacated the “count once” constraint on recession-related loss recovery imposed by the Commission in Order No. 1926, but otherwise denied the petitions for review of the Postal Service and the mailers.

In Section I of these comments, we calculate the additional losses in contribution that the Postal Service should be allowed to recover in light of the court’s order vacating the “count once” constraint. Eliminating the constraint, while correcting an offsetting error in the calculations arising from the use of unit contribution data of the wrong vintage, warrants recovery of no more than $2.826 billion in cumulative losses—*i.e.*, an increase of $60 million over the $2.766 billion found by the Commission in Order No. 1926.

In Section II, we explain why the Commission should decline the Postal Service’s invitation to relitigate the Postal Service’s unsuccessful challenges to the “new normal” constraint. The court has remanded the case for the Commission to perform a single task: calculate the exigent rate surcharge without the “count once” limitation. Slip op. at 15-17, 20. The Commission has no obligation to allow the Postal Service to relitigate issues that it raised unsuccessfully with the court, and nothing in the court’s opinion suggests otherwise. Moreover, if the Commission were to allow the Postal Service to relitigate any of these issues, due process would require that the record be reopened to consider still other issues that support *reducing* the maximum allowed contribution from the exigent surcharge. The Postal Service should not be allowed to cherry-pick the issues for reopening. The resulting proceeding would likely be more protracted and costly, and ultimately less profitable for the Postal Service, than a remand proceeding limited to the “count once” issue. This case has already been pending for two years. The mailing industry and the Postal Service will be best served by the certainty and finality of a speedy resolution.

I. CORRECTLY ADJUSTING THE COMMISSION'S CUMULATIVE LOSS CALCULATIONS BY ELIMINATING THE "COUNT ONCE" CONSTRAINT RAISES THE CUMULATIVE LOSSES FROM $2.766 BILLION TO $2.826 BILLION OR LESS, NOT $3.957 BILLION.

In its June 8 motion, the Postal Service calculated that eliminating the "count once" constraint would increase the $2.766 billion cumulative lost contribution calculated by the Commission in Order No. 1926 to $3.957 billion, an increase of $1.191 billion.[1] In fact, the cumulative losses, properly calculated with the "count once" constraint removed, are no more than $2.826 billion.

The Postal Service has erred in its method of converting the additional volume losses produced by eliminating the "count once" constraint (USPS June 8 workpaper, columns B and D) into contribution losses (*id*., columns C and E). To perform this conversion, the USPS has multiplied the volumes in column D by unit contribution values for Fiscal Year 2014 After Rates (column A). This is incorrect. Properly determining the total losses in contribution in each of four fiscal years from 2008 through 2011 requires multiplying the volume losses in each year by the unit contribution for *the same year*. The resulting product is the correct measure of the contribution loss for that year. The cumulative lost contribution for 2008 through 2011 is the sum of the four products.

The requirement that the volume losses incurred during each year of the 2008-2011 period must be matched with the unit contribution values for that year is inherent in the "due to" requirement of 39 U.S.C. § 3622(d)(1)(E). Quantifying the lost contribution or profits that were due to a supervening event (e.g., the breach of a contract, the

[1] Motion of the USPS to Suspend Exigent Surcharge Removal Provisions of Order No. 1926 and to establish Remand Proceedings (June 8, 2015) at 5-6 and workpaper (unnumbered last page) (hereinafter "USPS June 8 workpaper").

infringement of a patent or, here, the 2007-2009 recession) requires a court or agency to compare the profits or contribution that the claimant actually earned with the estimated profits or contribution that the claimant *would have* earned *but for* the supervening event. *See*, *e.g*., Mark A. Allen *et al*., "Reference Guide on Estimation of Economic Damages," in *Reference Manual on Scientific Evidence* 429-30 (3d ed. 2011) (available at http://www.fjc.gov/public/pdf.nsf/lookup/SciMan3D01.pdf/$file/SciMan3D01.pdf) ("The losses are the difference between the value the plaintiff would have received if the harmful event had not occurred and the value the plaintiff has or will receive, given the harmful event.").[2]

But for the recession, the Postal Service would have carried more mail in 2008, 2009, 2010 and 2011 than it actually carried. The extra *contribution* generated by the extra mail volume, however, would have equaled the added "but for" volume in each year multiplied by the per piece unit contribution available in *that* year—not in 2014.[3] Because unit contributions were generally higher in Fiscal Year 2014 than in Fiscal Years 2008, 2009, 2010 and 2011, applying the Fiscal Year 2014 values (and After Rates values, to

[2] *Accord*, *id*. at 432, 497-98; *Crystal Semiconductor Corp. v. Tritech Microelectronics Int'l*, 246 F.3d 1336, 1354 (Fed. Cir. 2001); *see also USPS v. PRC*, 640 F.3d 1263, 1268 (D.C. Cir, 2011) (the Commission "must match" the amount of any rate adjustment to "the revenue lost as a result" of the exigent circumstances)

[3] Reference Guide on Estimation of Economic Damages, *supra*, at 497-498, Tables 6 and 7 (calculating lost profits separately for each year of eight-year period based on the estimated revenue and costs for each year); *accord*, *Polaroid Corp v. Eastman Kodak Co*., 1990 U.S. Dist. LEXIS 17968 (D. Mass., Oct. 12, 1990) at *185-86, 192 (accepting, in dispute over lost profits for patent infringement, unit cost study based on "year-by-year" cost data instead of cost estimate based on a study of unit costs for only one year); *see also Jones & Laughlin Steel Corp. v. Pfeifer*, 462 U.S. 523, 533-37 (1983) (damages for an injured employee's lost future earnings should reflect the best available estimate of the employee's expected earnings in each of the years in which the employee would have been likely to continue work but for the injury).

boot) to the volume losses experienced in Fiscal Years 2008, 2009, 2010 and 2011 overstates the Postal Service's actual contribution losses in those years.

The Postal Service recognized these principles earlier in this docket. In USPS workpaper "Cumulative.v.Annual.Impact(2).xls" (filed December 6, 2013), the USPS calculated its cumulative lost contribution by properly matching the vintages of the unit contributions with the vintages of the volume losses. *See id*., workbook "CRA Level," columns E through H (multiplying FY 2008 volume losses by FY 2008 unit contributions, M through P (multiplying FY 2009 volume losses by FY 2009 unit contributions), U through X (multiplying FY 2010 volume losses by FY 2010 unit contributions), AC through AF (multiplying FY 2011 volume losses by FY 2011 unit contributions).

In comments filed on the same day, the Postal Service made clear that this matching of vintages was intentional:

> Thus, to more accurately use the lost volumes shown in the table to calculate a *cumulative* lost contribution, it would be necessary to take the estimates of lost volume in each separate fiscal year and ***apply to them the relevant unit contributions for that particular fiscal year***, and then sum the resulting annual lost contributions across fiscal years.

Docket No. R2013-11, Reply Comments of the USPS (December 6, 2013) at 16 (emphasis added). The Commission recognized this as well:

> [The USPS] acknowledges that in order to obtain a cumulative amount of lost contribution over a series of years, it would be necessary to "take the estimates of lost volume in each separate fiscal year and ***apply to them the relevant unit contributions for that particular fiscal year***, and then sum the resulting annual lost contributions across fiscal years."

Order No. 1926 at 103-04 (emphasis added).

The Commission, however, unaccountably replaced the 2008-2011 unit contribution values with FY 2014 After Year Rates unit contributions for each year. *Id*. at 105-06. This was the Commission's sole explanation for this change:

> The Commission uses the Postal Service's preferred method of multiplying the total volume loss due to the Great Recession by the FY 2014 After Rates contribution. Using the FY 2014 After Rates contribution to calculate the total lost contribution allows for a more meaningful comparison between the total lost contribution and the expected After Rates contribution of $1.808 billion.[102]
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> [102] *See* Postal Service Reply Comments at 18 (using FY 2014 unit contribution allows a "more apples-to-apples comparison to the FY 2014 increased exigent contribution").

Id. at 105. This explanation is baffling. Applying FY 2014 After Rates unit contributions to the volume losses for each of the years FY 2008 through FY 2011 was *not* the Postal Service's preferred method for the purpose of estimating the *cumulative* contribution loss due to the recession. The cited USPS reply comments advocated using FY 2014 unit contributions only to convert volume losses *in FY 2014* into contribution losses *in FY 2014*. USPS Reply Comments (December 6, 2013) at 18.

In any event, using FY 2014 After Rates unit contributions does *not* provide a "meaningful comparison between the total lost contribution and the expected After Rates contribution." As explained above, the additional contribution that the USPS would have earned in FY 2008-2011 but for the recession would have equaled the mail volume losses in each year that can properly be attributed to the recession, multiplied by the unit contributions *in that year*. Additional mail volume in FY 2008, 2009, 2010 or 2011 would not have generated FY 2014 unit contributions. *See* pp. 3-5, *supra*.

To calculate the Postal Service's contribution losses correctly, the mailers have used the same method to convert volume losses into contribution losses that the USPS used in its December 6, 2013 reply comments. We have applied this method to the Commission's volume loss calculations (as adjusted to eliminate the "count once" constraint).[4] We have done so by using the Postal Service's December 6, 2013 workpaper entitled "Cumulative.v.Annual.Impact(2).xls," but with corrected volume loss estimates. We also have made two other minor adjustments to the line items used in calculating lost volume and contribution to be consistent with the line items used in the Commission's volume and contribution loss library references. *See, e.g.,* PRC-LR-R2013-11/2, PRC_LR_R2013_11_2 Final.xls, Tab "Summary." Specifically, we have inserted a row for First-Class International Mail and zeroed out the International Mail row in the Postal Service spreadsheet.

An Excel spreadsheet providing these calculations has been filed with the Commission today as library reference MPA *et al*.-LR-R2013-11R/1. The calculations in the "CRA Level" worksheet of the library reference (which are restated more concisely in the "Summary" worksheet and in Exhibit A, *infra*), show that adjusting the $2.766 billion cumulative lost contribution calculated by the Commission in Order No. 1926 by (1) vacating the "count once" restriction and (2) restating the calculation of lost contribution by replacing the FY 2014 AR unit contribution values with unit contribution values that match the year in which the volume losses occurred produces a cumulative loss of $2.826 billion. This figure is only slightly higher than the $2.766 billion figure computed by the

[4] Note that the volume losses in this library reference (cells D33, L33, T33, and AB33) are the same as those presented in the USPS June 8, 2015 workpaper.

Commission in Order No. 1926 because substituting the correct vintages of unit contributions nearly cancels out the effects of eliminating the "count once" constraint.

Accordingly, the Commission should modify Order No. 1926 by authorizing the Postal Service to extend the termination date of the 4.3 percent exigent surcharge by a period long enough to collect $2.826 billion in total contribution instead of $2.766 billion.

II. THE COMMISSION SHOULD DECLINE TO REOPEN THE "NEW NORMAL" CONSTRAINT OR ANY OTHER ASPECT OF ORDER NO. 1926 THAT WAS UNSUCCESSFULLY CHALLENGED IN THE COURT OF APPEALS.

The Postal Service, in its June 8 Motion, asked the Commission to broaden the scope of the remanded proceedings to encompass not only the recalculation of the total surcharge cap without the "count once" limitation but also to allow the Postal Service to relitigate portions of Order No. 1926 that the Postal Service challenged unsuccessfully in the D.C. Circuit. The Postal Service sought, in particular, to relitigate the "new normal" limitation on the theory that the "rationale for the dates chosen by the Commission as marking the arrival of the 'new normal' can[not] be reconciled with the Commission's analysis in a subsequent portion of Order No. 1926 concerning why relief from exigent harm meets the 'necessary' prong of the statutory exigent provision." USPS Motion at 3-4. The Postal Service claimed that "the court left open the question of whether the totality of Order No. 1926 stated a consistent position regarding the Postal Service's ability to reduce institutional costs through operational adjustments made in response to dramatically lower volume levels." *Id*. at 3.

Although Order No. 2540 did not reject the Postal Service's request explicitly, the expedited procedural schedule adopted by the Commission is inconsistent with the more open-ended proceeding sought by the Postal Service. The Commission's approach is correct.

The Postal Service's expansive reading of the scope of the remanded proceedings contemplated by the D.C. Circuit opinion is refuted by the court's opinion. The court, after considering the Postal Service's criticisms of the "new normal" restriction at length, slip op. at 11-15, held that the Commission's application of the "new normal" rule was well reasoned and grounded in the evidence before the Commission. The Court found, *inter alia*, that accepting the Postal Service's "wooden" reading of the "due to" clause would justify an "unending rate increase." *Id*. at 13. The Court therefore held that the "new normal" standard as applied by the Commission "comfortably passes deferential APA review." *Id*. at 17.

The Postal Service gains nothing by asserting that the Commission's application of the "new normal" constraint was "inconsistent with" the Commission's finding elsewhere in Order No. 1926 that a rate increase was "'necessary.'" USPS Motion at 3-4 & n. 4. The court declined to decide the argument because it was not properly before the court. Slip op. at 17 n. 3. Elsewhere in its decision, however, the court made clear its disagreement with the underlying premise of the argument: that the "new normal" standard must allow the Postal Service to recover through exigent rate increases any and all costs whose recovery is "necessary" within the meaning of 39 U.S.C. § 3622(d)(1)(E):

> Given the Accountability Act's central focus on tightly restricting Postal Service rate increases and increasing efficiency, the Commission sensibly concluded that the statutory exception allowing higher rates when needed to respond to extraordinary financial circumstances should only continue as long as those circumstances, in fact, remained extra-ordinary. The Commission's "new normal" test is designed to capture precisely the time when the exigent character of a circumstance dissipates—when its effects

> lose their exceptional character—even though the effects in some literal, but-for causal sense linger. In other words, the Commission permissibly reasoned that, just because some of the effects of exigent circumstances may continue for the foreseeable future, that does not mean that those circumstances remain "extraordinary" or "exceptional" for just as long.

Slip op. at 12.

The "new normal" constraint implements the "due to" or causation prong of 39 U.S.C. § 3622(d)(1)(E), the court added, not the "reasonable and equitable and necessary" prong. Slip op. at 12-13. And the "due to" provision "is not as woodenly literal as the Postal Service suggests." *Id*. at 13. Although "the effects of the recession may well continue to ripple" in "some *Palsgraf*ian sense . . . for as long as the Postal Service's proposed unending rate increase,"

> the Commission acted well within its discretion in concluding that the "due to" test is concerned with determining the extent of the impact of an extraordinary or exceptional past event. The "reasonable and equitable and necessary" test, by contrast, applies only *after* exigent causation for a loss has been established and turns on the Postal Service's *current* need to get back on its feet in the wake of the now-defined exigency. More specifically, the "reasonable and equitable and necessary" test looks to present conditions to determine what the Postal Service requires "to maintain and continue the development of postal services of the kind and quality adapted to the needs of the United States," 39 U.S.C. § 3662(d)(1)(E), given the realities of the post-exigency marketplace. And that inquiry focuses not on causation, but recovery. The Commission thus appropriately addressed those separate requirements in separate parts of its Order.

Slip op. at 13.

The court's observation that the "Commission . . . is free to consider that argument on remand," Slip op. at 17 n. 3, is not to the contrary. USPS Motion at 4 n. 3. The quoted statement is an unexceptionable truism of administrative law: an agency is normally permitted to consider any issue on remand. Apart from the effect of the "count once" rule, however, the Commission is not *required* to reconsider any aspect of Order No. 1926. And nothing in the court's opinion (including footnote 3) suggested that the Commission *should*, rather than *could*, reconsider its findings on the "new normal" constraint.[5]

In any event, the Postal Service has identified no error in the court's reasoning, and it is correct. The Commission provided ample justification in Order No. 1926 for rejecting the Postal Service's claim that long term trends "and even changes to the rate of electronic diversion "were attributable or "due to" the 2007-2009 recession. Order 1926 at 81; *see generally id*. at 77-82. Moreover, the share of the Postal Service's volume losses that the Commission attributed to the recession was, if anything, generous. The Commission accepted the Postal Service's non-linear analysis (except for Package Services) as the starting point for defining the advent of the new normal for each class. Order 1926 at 83, *aff'd*, slip op. at 15. The Commission then explained and documented the macroeconomic factors that it considered relevant in the computation of the new normal for each class, and applied those factors to the Postal Service's lost volume. Order

[5] The Postal Service's portrayal of the record before the D.C. Circuit is incoherent. On the one hand, the USPS asserts that it presented its position that the "new normal" standard is inconsistent with the discussion of the "necessary" clause of the statute "very forcefully in its briefs to the court." USPS Motion at 4, n.3. The USPS then claims that "in light of how extensively these arguments were developed by the Postal Service in its briefs, it seems clear that the court in footnote 3 is suggesting that the Commission reconsider this issue on remand." *Id*. This position is absurd. The court's opinion, explicitly stated in the footnote, was that the USPS had *not* properly raised the issue in its briefs. How could the court simultaneously (1) find that the USPS had not raised the issue in its briefs and (2) rely on the Postal Service's briefing of the issue to suggest that the Commission reconsider the issue on remand? If, of course, the Postal Service's footnote is intended to say either that the Court misread its Briefs or that the Court did not understand its argument, the remedy does not reside with the Commission.

1926 at 84-94, *aff'd*, slip op. at 8. Most importantly, the Commission credited the testimony of the Postal Service's own witness in defining the start of the New Normal for each class. Indeed, the concept of a new normal was first introduced by a Postal Service witness.   As the witness conceded, the Postal Service by 2010-2011 was "in a world back to where we were before" in terms of reliable volume forecasts. Order 1926 at 93; Slip Op. at 14, 16-17.

Finally, if the Commission were to reopen the record for reconsideration of the "new normal" limitation, the record should also be reopened to consider other previously-raised issues that are likely to warrant *reducing* the allowed exigent surcharge. For example:

(1) As the mailers explained in their briefs to the court, Order No. 1926 overstated the losses that were due to the 2007-2009 recession by erroneously attributing to the recession the volume losses associated with (1) several non-linear intervention variables in the Thress model, and (2) the trend component of the macroeconomic variable for Single-Piece First-Class Mail. The D.C. Circuit declined to consider these challenges on the ground that they involved "highly technical" issues that were beyond the expertise of "generalist judges." Slip op. at 18-19. The Commission is not so constrained. If the record is to be opened for reconsideration of issues other than the effect of eliminating the "count once" constraint, these issues should be reconsidered as well.

(2) Mail volume trends since 2013 raise serious doubt about whether the 2007-2009 recession caused as large a share of the decline in mail volume during and after the recession as the Commission concluded in Order No. 1926.

(3) Even assuming *arguendo* that the prescription of a larger and longer-lasting exigent surcharge might have been "reasonable and equitable and necessary" under 39 U.S.C. § 3622(d)(1)(E) in December 2013, when the Commission issued Order No. 1926, developments since then raise serious questions about whether the Postal Service needs any further surcharge revenue today. As the Court pointed out, the purpose of 3622(d)(1)(E) is to assess the Postal Service's "*current* need to get back on its feet in the wake of the now-defined exigency." Slip op. at 13 (emphasis in the original). The 2007-2009 recession ended by any measure at least four years ago, and it is open to question whether the Postal Service's *current* financial position is as precarious as the Commission perceived at the end of 2013, when Order No. 1926 was issued.

In the initial phase of this proceeding, the mailers noted that the Postal Service's liquidity had improved by approximately $320 million between the end of FY 2012 and the end of FY 2013, suggesting that the Postal Service's liquidity had bottomed out, and that a recovery was in progress. See Order No. 1926 at 117-18 (citing mailer comments). The Commission disagreed, stating that, "[w]hile the Postal Service had a modest improvement in overall liquidity in FY 2013, and expects to maintain a similar level of liquidity in FY 2014, any gains are expected to be short-lived and are not demonstrative of a significant change in financial health." *Id*. at 118. Events since then have made clear that the improvement in liquidity has been long-term and real.

By the end of Fiscal Year 2014—barely eight months after the exigent rate increases took effect—the USPS had $4.9 billion in cash and cash equivalents on hand, more than double the $2.3 billion on hand at the end of Fiscal Year 2013. USPS Form 10-K for FY 2014 (December 5, 2014) at 43. By March 31, 2015, cash and cash equivalents on hand had climbed to nearly $6.1 billion. USPS Form 10Q for quarter ended March 31, 2015 (May 7, 2015) at 4. By the end of May 2015, the Postal Service had $7.167 billion in cash on deposit with the Treasury. Bureau of the Fiscal Service, U.S. Treasury, *Monthly Statement of the Public Debt of the United States* (May 31, 2015) at 13 (available at www.treasurydirect.gov/govt/reports/pd/mspd/2015/opdm052015.pdf).

The Postal Service's capital spending plans reflect a judgment that this increase in liquidity is not a temporary aberration. The Postal Service's financial plan for FY 2015 shows capital commitments of $2.2 billion for this year, almost three times the annual average of $0.8 billion in the prior five years. 2015 USPS Integrated Financial Plan (November 24, 2014) at 5. These amounts appear to consist primarily of investments in long-lived assets such as buildings, mail processing equipment, and motor vehicles. An enterprise that is in a liquidity crisis, or expects to return to one, does not make long-term commitments of this kind.

For these and other reasons, venturing beyond the "count once" issue is likely to result in a proceeding that is more protracted and costly, with an end result less remunerative to the Postal Service, than a remand limited to the "count once" issue. And re-opening the record selectively, as the Postal Service proposes, would raise serious Due Process and APA issues that should be avoided.

CONCLUSION

The undersigned parties respectfully request that the Commission adopt the foregoing procedures for the remanded phase of this case after the Court of Appeals' mandate issues.

Respectfully submitted,

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Exhibit A

Summary of Impact of 2007-2009 Recession on USPS Volume and Contribution													
	Volume Loss (in Millions)				Unit Contribution (in Dollars)				Contribution Loss (in Millions of Dollars)				
	FY 2008	FY 2009	FY 2010	FY 2011	FY 2008	FY 2009	FY 2010	FY 2011	FY 2008	FY 2009	FY 2010	FY 2011	Total
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]=[1]*[5]	[10=[2]*[6]	[11]=[3]*[7]	[12=[4]*[8]	[13]=sum([9]:[12])
First-Class Mail	(582.7)	(2,446.7)	(3,490.0)	-					(105.9)	(510.0)	(721.0)	-	(1,336.9)
Single-Piece Letters	(625.9)	(1,297.5)	(1,830.2)	-	0.1787	0.1819	0.1849	0.1798	(111.9)	(236.1)	(338.4)	-	(686.3)
Single-Piece Cards	(35.5)	(72.4)	(100.9)	-	0.0319	0.0109	0.0142	0.0352	(1.1)	(0.8)	(1.4)	-	(3.4)
Presort Letters	108.4	(893.7)	(1,318.7)	-	0.2267	0.2305	0.2369	0.2396	24.6	(206.0)	(312.4)	-	(493.8)
Presort Cards	8.2	(60.6)	(87.7)	-	0.1283	0.1378	0.1371	0.1386	1.1	(8.4)	(12.0)	-	(19.3)
Flats	(49.3)	(116.5)	(159.8)	-	0.4416	0.4847	0.3924	0.3912	(21.8)	(56.5)	(62.7)	-	(141.0)
International Mail	11.3	(5.8)	7.3	-	0.2865	0.4026	0.8199	0.5692	3.2	(2.4)	6.0	-	6.9
Standard Mail	(5,350.0)	(20,922.0)	-	-					(395.4)	(1,283.5)	-	-	(1,678.9)
High-Density & Saturation Letters	(152.6)	(769.0)	-	-	0.0749	0.0726	0.0724	0.0748	(11.4)	(55.8)	-	-	(67.2)
H-D & Saturation Flats & Parcels	(415.6)	(2,005.9)	-	-	0.0977	0.0933	0.0904	0.0878	(40.6)	(187.0)	-	-	(227.7)
Carrier-Route	(378.5)	(1,797.7)	-	-	0.0769	0.0714	0.0711	0.0628	(29.1)	(128.3)	-	-	(157.4)
Letters	(3,700.5)	(13,861.6)	-	-	0.0899	0.0807	0.0859	0.0885	(332.6)	(1,119.2)	-	-	(1,451.8)
Flats	(688.0)	(2,438.9)	-	-	(0.0218)	(0.0788)	(0.0816)	(0.0947)	15.0	192.1	-	-	207.1
Non-Flat Machineables & Parcels	(14.8)	(48.8)	-	-	(0.2253)	(0.3016)	(0.2527)	(0.1522)	3.3	14.7	-	-	18.1
Periodicals Mail	(110.3)	(487.4)	(839.7)	(855.5)	(0.0508)	(0.0807)	(0.0841)	(0.0860)	5.6	39.3	70.6	73.6	189.1
Package Services	-	(3.4)	-	-					-	0.7	-	-	0.7
Bound Printed Matter Flats	-	(0.8)	-	-	0.3611	0.3717	0.2697	0.3166	-	(0.3)	-	-	(0.3)
Bound Printed Matter Parcels	-	(0.7)	-	-	0.1003	(0.0268)	(0.1091)	(0.0160)	-	0.0	-	-	0.0
Media and Library Rate Mail	-	(1.8)	-	-	(0.3660)	(0.5281)	(0.7291)	(0.9131)	-	1.0	-	-	1.0
TOTAL MARKET-DOMINANT MAIL	**(6,043.0)**	**(23,859.5)**	**(4,329.7)**	**(855.5)**					**(495.8)**	**(1,753.5)**	**(650.5)**	**73.6**	**(2,826.1)**

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