

UNITED STATES OF AMERICA
Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006

)

Docket No. R2006-1

SECOND NOTICE OF OFFICE OF THE CONSUMER ADVOCATE
CONCERNING ERRATA TO THE TESTIMONY OF
OCA WITNESS: JAMES F. CALLOW OCA-T-5
(October 10, 2006)

The Office of the Consumer Advocate hereby gives notice of the filing of the following revisions to the direct testimony of James F. Callow (OCA-T-5), filed on September 6, 2006, and revised September 22, 2006. The changes to the testimony are set forth below. Revised pages 3, 7, 8, and 17 of the testimony are attached hereto. The changes to OCA-T-5, Attachment 1, concern only Platinum subscription fees. Revised or new material is shaded in gray. A revised copy of OCA-T-5, Attachment 1, is attached.

Respectfully submitted,

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<u>Page</u>	<u>Line</u>	<u>Correction</u>
3	10	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
3	Note 1	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"; Delete "(REV9-22-06)." and insert "(REV10-10-06)"
7	Note 12	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
8	10	Delete "180" and insert "0"
	10	Delete "170" and insert "60"
	10	Delete "464" and insert "338"
	11	Delete "587" and insert "460"
8	Note 15	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
	Note 16	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
	Note 18	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
	Note 19	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
17	Note 37	Delete "(Revised 9-22-06)" and insert "(Revised 10-10-06)"
OCA-T-5	Attachment 1	Rows and columns shaded in gray are new, providing calculations for recent interrogatories. The column, "USPS vs. Current: Proposed Increase %", shows the revised proposed percentage increase.

1 PURPOSE AND SCOPE

2 The purpose of my testimony is twofold. First, I propose an alternative set of
3 fees for Confirm service. In order to cover the attributable costs of Confirm service and
4 make a reasonable contribution to institutional costs, I propose to retain the existing
5 structure of fees and simply adjust current fees, in contrast to the Postal Service, which
6 proposes a fundamental restructuring of the existing fee schedule. My proposed fees
7 produce a cost coverage of 127.3 percent that is consistent with the Postal Service's
8 proposal while preserving the benefits of the existing "subscription-based" fee
9 schedule—that of encouraging the expanded use of Confirm service for use in
10 promoting service performance measurement. OCA-T-5, Attachment 1 (Revised 10-10-
11 06), filed concurrently with this testimony, presents the development of my proposed
12 fees for Confirm service.¹

13 Second, I propose retention of the current requirement that mailers provide an
14 electronic "preshipment" notification for every outgoing Confirm mailing. Retaining this
15 requirement, which serves to "start the clock" for the Confirm mailings, is essential to
16 developing transparent, system-wide service performance measurement for business
17 mail. The Postal Service's proposal to delete this requirement from section 991.31 of
18 the Domestic Mail Classification Schedule should be rejected by the Commission.

¹ OCA-T-5, Attachment 1 (Revised 10-10-06), Excel file "OCA-T-5_Att1-Confirm (REV10-10-06).xls."

Table 1
CONFIRM SERVICE
USPS Proposed Fees

Annual User Fee	\$5,000
Additional Block User Fee (per 1 million "units")	
Blocks 1 - 9	\$70.00
Blocks 10 - 99	\$35.00
Blocks 100 +	\$17.50
Additional ID Code Fees	
Annual	\$2,000
Quarterly	\$750
Units per Scan	
First-Class Mail	1
Other Mail Classes	5

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A. Restructuring the Existing Subscription-Based Fee Schedule Will Adversely Affect Confirm Subscribers and Reduce Usage

The Postal Service's combined annual user fee plus declining block user fees will reduce the use of Confirm service by subscribers in response to costs that rise with usage. Current Silver subscribers, depending upon the number of quarterly subscriptions purchased during the year and use of First-Class Mail scans, will experience fee changes ranging from -14 to 190 percent.¹² Silver subscribers that purchased one, two, or three quarterly subscriptions will pay between 6 and 190 percent more than currently as combined total fees (i.e., the annual user fee plus declining block user fees) rise with usage.¹³ Only Silver subscribers that purchased

¹² OCA-T-5, Attachment (Revised 10-10-06). As discussed below, the effective cost per scan for Standard Mail or Periodicals scans is five-times higher as compared to First-Class Mail scans.

¹³ Id.

1 four sequential quarterly subscriptions will experience a decrease in combined total
2 fees of between -8 and -14 percent under the Postal Service's proposal.¹⁴ In addition,
3 current Gold subscribers using First-Class Mail scans will pay higher combined total
4 fees that rise 11 to 56 percent with usage under the Postal Service's proposal.¹⁵

5 For Platinum subscribers using only First-Class Mail scans, combined total fees
6 increase from -50 percent for 1 million scans, to 102 percent for 750 million scans, up to
7 145 percent for 1 billion scans.¹⁶ For Platinum subscribers purchasing the average
8 number of First-Class Mail and Standard Mail scans per block of 1 million units, the
9 increase in combined total fees is even greater.¹⁷ Combined total fee increases range
10 from -50 percent for 1 million scans, to 0 percent for 60 million scans, to 338 percent for
11 750 million scans, up to 460 percent for 1 billion scans.¹⁸

12 The only way for Platinum subscribers to avoid such rising fees is to limit usage.
13 According to the Postal Service, "[a]ny [Platinum] subscriber[s] who *chose* to use fewer
14 than 169,000,000 units would pay less under the proposed fee schedule."¹⁹ (Emphasis

¹⁴ Id. Information on the number of mailers that purchased one, two, three or four quarterly Silver subscriptions during Fiscal Years 2003, 2004, and 2005 is not available from the Postal Service. Tr. 14/3975 (OCA/USPS-T40-56(a)).

¹⁵ OCA-T-5, Attachment (Revised 10-10-06). The Postal Service claims that the maximum number of scans used by any current subscriber is near 750 million. Tr. 14/4144.

¹⁶ OCA-T-5, Attachment (Revised 10-10-06).

¹⁷ Tr. 14/3957 (OCA/USPS-T40-29).

¹⁸ OCA-T-5, Attachment (Revised 10-10-06).

¹⁹ Tr. 14/3976 (OCA/USPS-T40-57). The Postal Service estimates that a user could purchase 168 additional blocks and still spend less than the current \$10,000 Platinum subscription fee, calculates as follows: the \$5,000 annual user fee plus \$4,987.50 ((9 * \$70) + (90 * \$35) + (69 * \$17.50)) in declining block user fees. See *also* OCA-T-5, Attachment (Revised 10-10-06).

1 fee, and therefore do not expect a change in the number of Silver subscriptions. In
2 addition, I propose a modest increase of 15.6 percent in the Gold subscription fee.
3 Depending upon usage, this increase is less than the combined total fees (i.e., the
4 annual user fee and the declining block user fee) proposed by the Postal Service. As
5 discussed previously, combined total fees increase from 11 percent for a Gold
6 subscriber using only 1 million First-Class Mail scans, up to 56 percent for a subscriber
7 using 50 million scans. Under my proposal, any Gold subscriber using between 4
8 million and 50 million First-Class Mail scans will pay less compared to the combined
9 total fees proposed by the Postal Service.³⁷ In view of the fact that the Postal Service
10 estimates no loss of Gold subscribers, with considerably larger fee increases than I
11 propose, it appears reasonable to conclude that my proposed fees will not result in a
12 decrease in the number of Gold subscribers.

13 For Platinum subscribers, I propose a fee increase that preserves for large-
14 volume users the option of unlimited scans for a fixed subscription fee. Consequently,
15 Platinum subscribers were assigned the largest fee increase of \$9,500, representing an
16 increase of 95 percent. I assume such an increase will have little or no effect on the
17 number of Platinum subscribers. For larger mailers that track their mail using the
18 Platinum subscription service, a \$9,500 fee increase relative to total postage costs in
19 the millions or hundreds of millions of dollars annually is quite small when amortized
20 over millions of mailpieces.

³⁷ OCA-T-5, Attachment (Revised 10-10-06).

**SPECIAL SERVICES
CONFIRM
TEST YEAR 2008**

VALUE:	Volumes			Fees (\$)		Revenues (\$)		Percent Change
	Test Year			Current	Proposed	Before Rates	After Rates	
	FY2005	Before Rates	After Rates					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
Silver	16	16	16	\$2,000.00	\$2,000.00	\$32,000	\$32,000	0.0%
Additional Scans	0	0	0	\$500.00	\$500.00	\$0	\$0	0.0%
Gold	119	119	119	\$4,500.00	\$5,200.00	\$535,500	\$618,800	15.6%
Additional Scans	1	1	1	\$750.00	\$750.00	\$750	\$750	0.0%
Platinum	45	45	45	\$10,000.00	\$19,500.00	\$450,000	\$877,500	95.0%
	180	180	180			\$1,018,250	\$1,529,050	
Additional IDs								
Quarter	292	0	0	\$500	\$750	\$ -	\$ -	50.0%
Annual	0	0	0	\$2,000	\$2,000	\$ -	\$ -	0.0%
Total	292	0	0			\$ -	\$ -	
Revenue						\$1,018,250	\$1,529,050	
Total Cost (incl. 1% Contingency)							\$1,200,890 ^{1/}	
Cost Coverage							127.3%	

^{1/} USPS-LR-L-59, Attachment 17, page 1 of 1.

1 Qtr	\$2,000	Annual	\$5,000
2 Qtr	\$2,000	Additional Scans	
3 Qtr	\$2,000	Blk 1-9	\$70.00
4 Qtr	\$2,000	Blk 10-99	\$35.00
Add'l Scans	\$500	Blk 100 up	\$17.50

**SILVER SUBSCRIPTION
CURRENT**

**SILVER SUBSCRIPTION
USPS PROPOSED**

**SILVER SUBSCRIPTION
% CHG: USPS vs CURRENT**

Qtr	SILVER SUBSCRIPTION CURRENT			SILVER SUBSCRIPTION USPS PROPOSED							SILVER SUBSCRIPTION % CHG: USPS vs CURRENT	
	Number of First-Class Scans (Millions)	Total Annual Charge (\$)	Cost per Million Scans (\$)	First-Class Scans: "User Fee" Block of 1 Million	First-Class Scans: 1st - 9th Block of 1 Million	First-Class Scans: 10th - 99th Block of 1 Million	Total First-Class Scans: Block of 1 Million	Total Annual Charge (\$)	Cost per Million Scans (\$)	Number of First-Class Scans (Millions)	Proposed Increase %	
1	1	\$2,000	\$2,000	1			1	\$5,000	\$5,000	1	150%	
1	2	\$2,000	\$1,000	1	1		2	\$5,070	\$2,535	2	154%	
1	3	\$2,000	\$667	1	2		3	\$5,140	\$1,713	3	157%	
1	4	\$2,000	\$500	1	3		4	\$5,210	\$1,303	4	161%	
1	5	\$2,000	\$400	1	4		5	\$5,280	\$1,056	5	164%	
1	6	\$2,000	\$333	1	5		6	\$5,350	\$892	6	168%	
1	7	\$2,000	\$286	1	6		7	\$5,420	\$774	7	171%	
1	8	\$2,000	\$250	1	7		8	\$5,490	\$686	8	175%	
1	9	\$2,000	\$222	1	8		9	\$5,560	\$618	9	178%	
1	10	\$2,000	\$200	1	9		10	\$5,630	\$563	10	182%	
1	11	\$2,000	\$182	1	9	1	11	\$5,665	\$515	11	183%	
1	12	\$2,000	\$167	1	9	2	12	\$5,700	\$475	12	185%	
1	13	\$2,000	\$154	1	9	3	13	\$5,735	\$441	13	187%	
1	14	\$2,000	\$143	1	9	4	14	\$5,770	\$412	14	189%	
1	15	\$2,000	\$133	1	9	5	15	\$5,805	\$387	15	190%	
2	16	\$4,000	\$250	1	9	6	16	\$5,840	\$365	16	46%	
2	17	\$4,000	\$235	1	9	7	17	\$5,875	\$346	17	47%	
2	18	\$4,000	\$222	1	9	8	18	\$5,910	\$328	18	48%	
2	19	\$4,000	\$211	1	9	9	19	\$5,945	\$313	19	49%	
2	20	\$4,000	\$200	1	9	10	20	\$5,980	\$299	20	50%	
2	21	\$4,000	\$190	1	9	11	21	\$6,015	\$286	21	50%	
2	22	\$4,000	\$182	1	9	12	22	\$6,050	\$275	22	51%	
2	23	\$4,000	\$174	1	9	13	23	\$6,085	\$265	23	52%	
2	24	\$4,000	\$167	1	9	14	24	\$6,120	\$255	24	53%	
2	25	\$4,000	\$160	1	9	15	25	\$6,155	\$246	25	54%	
2	26	\$4,000	\$154	1	9	16	26	\$6,190	\$238	26	55%	
2	27	\$4,000	\$148	1	9	17	27	\$6,225	\$231	27	56%	
2	28	\$4,000	\$143	1	9	18	28	\$6,260	\$224	28	57%	
2	29	\$4,000	\$138	1	9	19	29	\$6,295	\$217	29	57%	
2	30	\$4,000	\$133	1	9	20	30	\$6,330	\$211	30	58%	

3	31	\$6,000	\$194	1	9	21	31	\$6,365	\$205	31	6%
3	32	\$6,000	\$188	1	9	22	32	\$6,400	\$200	32	7%
3	33	\$6,000	\$182	1	9	23	33	\$6,435	\$195	33	7%
3	34	\$6,000	\$176	1	9	24	34	\$6,470	\$190	34	8%
3	35	\$6,000	\$171	1	9	25	35	\$6,505	\$186	35	8%
3	36	\$6,000	\$167	1	9	26	36	\$6,540	\$182	36	9%
3	37	\$6,000	\$162	1	9	27	37	\$6,575	\$178	37	10%
3	38	\$6,000	\$158	1	9	28	38	\$6,610	\$174	38	10%
3	39	\$6,000	\$154	1	9	29	39	\$6,645	\$170	39	11%
3	40	\$6,000	\$150	1	9	30	40	\$6,680	\$167	40	11%
3	41	\$6,000	\$146	1	9	31	41	\$6,715	\$164	41	12%
3	42	\$6,000	\$143	1	9	32	42	\$6,750	\$161	42	13%
3	43	\$6,000	\$140	1	9	33	43	\$6,785	\$158	43	13%
3	44	\$6,000	\$136	1	9	34	44	\$6,820	\$155	44	14%
3	45	\$6,000	\$133	1	9	35	45	\$6,855	\$152	45	14%
4	46	\$8,000	\$174	1	9	36	46	\$6,890	\$150	46	-14%
4	47	\$8,000	\$170	1	9	37	47	\$6,925	\$147	47	-13%
4	48	\$8,000	\$167	1	9	38	48	\$6,960	\$145	48	-13%
4	49	\$8,000	\$163	1	9	39	49	\$6,995	\$143	49	-13%
4	50	\$8,000	\$160	1	9	40	50	\$7,030	\$141	50	-12%
4	51	\$8,000	\$157	1	9	41	51	\$7,065	\$139	51	-12%
4	52	\$8,000	\$154	1	9	42	52	\$7,100	\$137	52	-11%
4	53	\$8,000	\$151	1	9	43	53	\$7,135	\$135	53	-11%
4	54	\$8,000	\$148	1	9	44	54	\$7,170	\$133	54	-10%
4	55	\$8,000	\$145	1	9	45	55	\$7,205	\$131	55	-10%
4	56	\$8,000	\$143	1	9	46	56	\$7,240	\$129	56	-10%
4	57	\$8,000	\$140	1	9	47	57	\$7,275	\$128	57	-9%
4	58	\$8,000	\$138	1	9	48	58	\$7,310	\$126	58	-9%
4	59	\$8,000	\$136	1	9	49	59	\$7,345	\$124	59	-8%
4	60	\$8,000	\$133	1	9	50	60	\$7,380	\$123	60	-8%

Annual \$4,500
Add'l Scans \$750

Annual \$5,000
Additional Scans
Blk 1-9 \$70.00
Blk 10-99 \$35.00
Blk 100 up \$17.50

**GOLD SUBSCRIPTION
CURRENT**

**GOLD SUBSCRIPTION
USPS PROPOSED**

**GOLD SUBSCRIPTION
% CHG: USPS vs CURRENT**

Number of First-Class Scans (Millions)	Total Annual Charge (\$)	Cost per Million Scans (\$)	First-Class				Total First- Class		Total Annual Charge (\$)	Cost per Million Scans (\$)	Number of First-Class Scans (Millions)	Proposed Increase %
			Scans: "User Fee" Block of Million	Scans: 1st - 9th Block of Million	Scans: 10th - 99th Block of Million	Scans: 100 + Blocks of 1 Million	Scans: 100 Block of Million	Scans: 1 Block of Million				
1	\$4,500	\$4,500	1					\$5,000	\$5,000	1	11%	
2	\$4,500	\$2,250	1	1				\$5,070	\$2,535	2	13%	
3	\$4,500	\$1,500	1	2				\$5,140	\$1,713	3	14%	
4	\$4,500	\$1,125	1	3				\$5,210	\$1,303	4	16%	
5	\$4,500	\$900	1	4				\$5,280	\$1,056	5	17%	
6	\$4,500	\$750	1	5				\$5,350	\$892	6	19%	
7	\$4,500	\$643	1	6				\$5,420	\$774	7	20%	
8	\$4,500	\$563	1	7				\$5,490	\$686	8	22%	
9	\$4,500	\$500	1	8				\$5,560	\$618	9	24%	
10	\$4,500	\$450	1	9				\$5,630	\$563	10	25%	
11	\$4,500	\$409	1	9	1			\$5,665	\$515	11	26%	
12	\$4,500	\$375	1	9	2			\$5,700	\$475	12	27%	
13	\$4,500	\$346	1	9	3			\$5,735	\$441	13	27%	
14	\$4,500	\$321	1	9	4			\$5,770	\$412	14	28%	
15	\$4,500	\$300	1	9	5			\$5,805	\$387	15	29%	
16	\$4,500	\$281	1	9	6			\$5,840	\$365	16	30%	
17	\$4,500	\$265	1	9	7			\$5,875	\$346	17	31%	
18	\$4,500	\$250	1	9	8			\$5,910	\$328	18	31%	
19	\$4,500	\$237	1	9	9			\$5,945	\$313	19	32%	
20	\$4,500	\$225	1	9	10			\$5,980	\$299	20	33%	
21	\$4,500	\$214	1	9	11			\$6,015	\$286	21	34%	
22	\$4,500	\$205	1	9	12			\$6,050	\$275	22	34%	
23	\$4,500	\$196	1	9	13			\$6,085	\$265	23	35%	
24	\$4,500	\$188	1	9	14			\$6,120	\$255	24	36%	
25	\$4,500	\$180	1	9	15			\$6,155	\$246	25	37%	
26	\$4,500	\$173	1	9	16			\$6,190	\$238	26	38%	
27	\$4,500	\$167	1	9	17			\$6,225	\$231	27	38%	
28	\$4,500	\$161	1	9	18			\$6,260	\$224	28	39%	
29	\$4,500	\$155	1	9	19			\$6,295	\$217	29	40%	
30	\$4,500	\$150	1	9	20			\$6,330	\$211	30	41%	
31	\$4,500	\$145	1	9	21			\$6,365	\$205	31	41%	
32	\$4,500	\$141	1	9	22			\$6,400	\$200	32	42%	
33	\$4,500	\$136	1	9	23			\$6,435	\$195	33	43%	
34	\$4,500	\$132	1	9	24			\$6,470	\$190	34	44%	

35	\$4,500	\$129	1	9	25	35	\$6,505	\$186	35	45%
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36	\$4,500	\$125	1	9	26		36	\$6,540	\$182	36	45%
37	\$4,500	\$122	1	9	27		37	\$6,575	\$178	37	46%
38	\$4,500	\$118	1	9	28		38	\$6,610	\$174	38	47%
39	\$4,500	\$115	1	9	29		39	\$6,645	\$170	39	48%
40	\$4,500	\$113	1	9	30		40	\$6,680	\$167	40	48%
41	\$4,500	\$110	1	9	31		41	\$6,715	\$164	41	49%
42	\$4,500	\$107	1	9	32		42	\$6,750	\$161	42	50%
43	\$4,500	\$105	1	9	33		43	\$6,785	\$158	43	51%
44	\$4,500	\$102	1	9	34		44	\$6,820	\$155	44	52%
45	\$4,500	\$100	1	9	35		45	\$6,855	\$152	45	52%
46	\$4,500	\$98	1	9	36		46	\$6,890	\$150	46	53%
47	\$4,500	\$96	1	9	37		47	\$6,925	\$147	47	54%
48	\$4,500	\$94	1	9	38		48	\$6,960	\$145	48	55%
49	\$4,500	\$92	1	9	39		49	\$6,995	\$143	49	55%
50	\$4,500	\$90	1	9	40		50	\$7,030	\$141	50	56%
56	\$5,250	\$94	1	9	46		56	\$7,240	\$129	56	38%
62	\$6,000	\$97	1	9	52		62	\$7,450	\$120	62	24%
68	\$6,750	\$99	1	9	58		68	\$7,660	\$113	68	13%
74	\$7,500	\$101	1	9	64		74	\$7,870	\$106	74	5%
80	\$8,250	\$103	1	9	70		80	\$8,080	\$101	80	-2%
86	\$9,000	\$105	1	9	76		86	\$8,290	\$96	86	-8%
92	\$9,750	\$106	1	9	82		92	\$8,500	\$92	92	-13%
98	\$10,500	\$107	1	9	88		98	\$8,710	\$89	98	-17%
104	\$11,250	\$108	1	9	90	4	104	\$8,850	\$85	104	-21%
110	\$12,000	\$109	1	9	90	10	110	\$8,955	\$81	110	-25%
116	\$12,750	\$110	1	9	90	16	116	\$9,060	\$78	116	-29%
122	\$13,500	\$111	1	9	90	22	122	\$9,165	\$75	122	-32%
128	\$14,250	\$111	1	9	90	28	128	\$9,270	\$72	128	-35%
134	\$15,000	\$112	1	9	90	34	134	\$9,375	\$70	134	-38%
140	\$15,750	\$113	1	9	90	40	140	\$9,480	\$68	140	-40%
146	\$16,500	\$113	1	9	90	46	146	\$9,585	\$66	146	-42%
152	\$17,250	\$113	1	9	90	52	152	\$9,690	\$64	152	-44%
158	\$18,000	\$114	1	9	90	58	158	\$9,795	\$62	158	-46%
164	\$18,750	\$114	1	9	90	64	164	\$9,900	\$60	164	-47%
170	\$19,500	\$115	1	9	90	70	170	\$10,005	\$59	170	-49%

Annual \$10,000

Annual \$5,000

Additional Scans

Blk 1-9 \$70.00

Blk 10-99 \$35.00

Blk 100 up \$17.50

**PLATINUM SUBSCRIPTION
CURRENT**

**PLATINUM SUBSCRIPTION
USPS PROPOSED**

**PLATINUM SUBSCRIPTION
% CHG: USPS vs CURRENT**

Number of First-Class Scans (Millions)	Total Annual Charge (\$)	Cost per Million Scans (\$)	First-Class Scans: "User Fee" Block of 1 Million	First-Class Scans: 1st - 9th Block of 1 Million	First-Class Scans: 10th - 99th Block of 1 Million	First-Class Scans: 100 + Blocks of 1 Million	Total First- Class Scans: Block of 1 Million	Total Annual Charge (\$)	Cost per Million Scans (\$)	Number of First-Class Scans (Millions)	Proposed Increase %
1	\$10,000	\$10,000	1				1	\$5,000	\$5,000	1	-50%
2	\$10,000	\$5,000	1	1			2	\$5,070	\$2,535	2	-49%
3	\$10,000	\$3,333	1	2			3	\$5,140	\$1,713	3	-49%
4	\$10,000	\$2,500	1	3			4	\$5,210	\$1,303	4	-48%
5	\$10,000	\$2,000	1	4			5	\$5,280	\$1,056	5	-47%
6	\$10,000	\$1,667	1	5			6	\$5,350	\$892	6	-47%
7	\$10,000	\$1,429	1	6			7	\$5,420	\$774	7	-46%
8	\$10,000	\$1,250	1	7			8	\$5,490	\$686	8	-45%
9	\$10,000	\$1,111	1	8			9	\$5,560	\$618	9	-44%
10	\$10,000	\$1,000	1	9			10	\$5,630	\$563	10	-44%
11	\$10,000	\$909	1	9	1		11	\$5,665	\$515	11	-43%
12	\$10,000	\$833	1	9	2		12	\$5,700	\$475	12	-43%
13	\$10,000	\$769	1	9	3		13	\$5,735	\$441	13	-43%
14	\$10,000	\$714	1	9	4		14	\$5,770	\$412	14	-42%
15	\$10,000	\$667	1	9	5		15	\$5,805	\$387	15	-42%
16	\$10,000	\$625	1	9	6		16	\$5,840	\$365	16	-42%
17	\$10,000	\$588	1	9	7		17	\$5,875	\$346	17	-41%
18	\$10,000	\$556	1	9	8		18	\$5,910	\$328	18	-41%
19	\$10,000	\$526	1	9	9		19	\$5,945	\$313	19	-41%
20	\$10,000	\$500	1	9	10		20	\$5,980	\$299	20	-40%
21	\$10,000	\$476	1	9	11		21	\$6,015	\$286	21	-40%
22	\$10,000	\$455	1	9	12		22	\$6,050	\$275	22	-40%
23	\$10,000	\$435	1	9	13		23	\$6,085	\$265	23	-39%
24	\$10,000	\$417	1	9	14		24	\$6,120	\$255	24	-39%
25	\$10,000	\$400	1	9	15		25	\$6,155	\$246	25	-38%
26	\$10,000	\$385	1	9	16		26	\$6,190	\$238	26	-38%
27	\$10,000	\$370	1	9	17		27	\$6,225	\$231	27	-38%
28	\$10,000	\$357	1	9	18		28	\$6,260	\$224	28	-37%
29	\$10,000	\$345	1	9	19		29	\$6,295	\$217	29	-37%
30	\$10,000	\$333	1	9	20		30	\$6,330	\$211	30	-37%
31	\$10,000	\$323	1	9	21		31	\$6,365	\$205	31	-36%
32	\$10,000	\$313	1	9	22		32	\$6,400	\$200	32	-36%
33	\$10,000	\$303	1	9	23		33	\$6,435	\$195	33	-36%
34	\$10,000	\$294	1	9	24		34	\$6,470	\$190	34	-35%
35	\$10,000	\$286	1	9	25		35	\$6,505	\$186	35	-35%
36	\$10,000	\$278	1	9	26		36	\$6,540	\$182	36	-35%
37	\$10,000	\$270	1	9	27		37	\$6,575	\$178	37	-34%
38	\$10,000	\$263	1	9	28		38	\$6,610	\$174	38	-34%

39	\$10,000	\$256	1	9	29	39	\$6,645	\$170	39	-34%
40	\$10,000	\$250	1	9	30	40	\$6,680	\$167	40	-33%
41	\$10,000	\$244	1	9	31	41	\$6,715	\$164	41	-33%
42	\$10,000	\$238	1	9	32	42	\$6,750	\$161	42	-33%
43	\$10,000	\$233	1	9	33	43	\$6,785	\$158	43	-32%
44	\$10,000	\$227	1	9	34	44	\$6,820	\$155	44	-32%
45	\$10,000	\$222	1	9	35	45	\$6,855	\$152	45	-31%
46	\$10,000	\$217	1	9	36	46	\$6,890	\$150	46	-31%
47	\$10,000	\$213	1	9	37	47	\$6,925	\$147	47	-31%
48	\$10,000	\$208	1	9	38	48	\$6,960	\$145	48	-30%
49	\$10,000	\$204	1	9	39	49	\$6,995	\$143	49	-30%
50	\$10,000	\$200	1	9	40	50	\$7,030	\$141	50	-30%
51	\$10,000	\$196	1	9	41	51	\$7,065	\$139	51	-29%
52	\$10,000	\$192	1	9	42	52	\$7,100	\$137	52	-29%
53	\$10,000	\$189	1	9	43	53	\$7,135	\$135	53	-29%
54	\$10,000	\$185	1	9	44	54	\$7,170	\$133	54	-28%
55	\$10,000	\$182	1	9	45	55	\$7,205	\$131	55	-28%
56	\$10,000	\$179	1	9	46	56	\$7,240	\$129	56	-28%
57	\$10,000	\$175	1	9	47	57	\$7,275	\$128	57	-27%
58	\$10,000	\$172	1	9	48	58	\$7,310	\$126	58	-27%
59	\$10,000	\$169	1	9	49	59	\$7,345	\$124	59	-27%
60	\$10,000	\$167	1	9	50	60	\$7,380	\$123	60	-26%
61	\$10,000	\$164	1	9	51	61	\$7,415	\$122	61	-26%
62	\$10,000	\$161	1	9	52	62	\$7,450	\$120	62	-26%
63	\$10,000	\$159	1	9	53	63	\$7,485	\$119	63	-25%
64	\$10,000	\$156	1	9	54	64	\$7,520	\$118	64	-25%
65	\$10,000	\$154	1	9	55	65	\$7,555	\$116	65	-24%
66	\$10,000	\$152	1	9	56	66	\$7,590	\$115	66	-24%
67	\$10,000	\$149	1	9	57	67	\$7,625	\$114	67	-24%
68	\$10,000	\$147	1	9	58	68	\$7,660	\$113	68	-23%
69	\$10,000	\$145	1	9	59	69	\$7,695	\$112	69	-23%
70	\$10,000	\$143	1	9	60	70	\$7,730	\$110	70	-23%
71	\$10,000	\$141	1	9	61	71	\$7,765	\$109	71	-22%
72	\$10,000	\$139	1	9	62	72	\$7,800	\$108	72	-22%
73	\$10,000	\$137	1	9	63	73	\$7,835	\$107	73	-22%
74	\$10,000	\$135	1	9	64	74	\$7,870	\$106	74	-21%
75	\$10,000	\$133	1	9	65	75	\$7,905	\$105	75	-21%
76	\$10,000	\$132	1	9	66	76	\$7,940	\$104	76	-21%
77	\$10,000	\$130	1	9	67	77	\$7,975	\$104	77	-20%
78	\$10,000	\$128	1	9	68	78	\$8,010	\$103	78	-20%
79	\$10,000	\$127	1	9	69	79	\$8,045	\$102	79	-20%
80	\$10,000	\$125	1	9	70	80	\$8,080	\$101	80	-19%
81	\$10,000	\$123	1	9	71	81	\$8,115	\$100	81	-19%
82	\$10,000	\$122	1	9	72	82	\$8,150	\$99	82	-19%
83	\$10,000	\$120	1	9	73	83	\$8,185	\$99	83	-18%
84	\$10,000	\$119	1	9	74	84	\$8,220	\$98	84	-18%
85	\$10,000	\$118	1	9	75	85	\$8,255	\$97	85	-17%
86	\$10,000	\$116	1	9	76	86	\$8,290	\$96	86	-17%
87	\$10,000	\$115	1	9	77	87	\$8,325	\$96	87	-17%
88	\$10,000	\$114	1	9	78	88	\$8,360	\$95	88	-16%

89	\$10,000	\$112	1	9	79	89	\$8,395	\$94	89	-16%
90	\$10,000	\$111	1	9	80	90	\$8,430	\$94	90	-16%
91	\$10,000	\$110	1	9	81	91	\$8,465	\$93	91	-15%
92	\$10,000	\$109	1	9	82	92	\$8,500	\$92	92	-15%
93	\$10,000	\$108	1	9	83	93	\$8,535	\$92	93	-15%
94	\$10,000	\$106	1	9	84	94	\$8,570	\$91	94	-14%
95	\$10,000	\$105	1	9	85	95	\$8,605	\$91	95	-14%
96	\$10,000	\$104	1	9	86	96	\$8,640	\$90	96	-14%
97	\$10,000	\$103	1	9	87	97	\$8,675	\$89	97	-13%
98	\$10,000	\$102	1	9	88	98	\$8,710	\$89	98	-13%
99	\$10,000	\$101	1	9	89	99	\$8,745	\$88	99	-13%
100	\$10,000	\$100	1	9	90	100	\$8,780	\$88	100	-12%
101	\$10,000	\$99	1	9	90	101	\$8,798	\$87	101	-12%
102	\$10,000	\$98	1	9	90	102	\$8,815	\$86	102	-12%
103	\$10,000	\$97	1	9	90	103	\$8,833	\$86	103	-12%
104	\$10,000	\$96	1	9	90	104	\$8,850	\$85	104	-12%
105	\$10,000	\$95	1	9	90	105	\$8,868	\$84	105	-11%
106	\$10,000	\$94	1	9	90	106	\$8,885	\$84	106	-11%
107	\$10,000	\$93	1	9	90	107	\$8,903	\$83	107	-11%
108	\$10,000	\$93	1	9	90	108	\$8,920	\$83	108	-11%
109	\$10,000	\$92	1	9	90	109	\$8,938	\$82	109	-11%
110	\$10,000	\$91	1	9	90	110	\$8,955	\$81	110	-10%
111	\$10,000	\$90	1	9	90	111	\$8,973	\$81	111	-10%
112	\$10,000	\$89	1	9	90	112	\$8,990	\$80	112	-10%
113	\$10,000	\$88	1	9	90	113	\$9,008	\$80	113	-10%
114	\$10,000	\$88	1	9	90	114	\$9,025	\$79	114	-10%
115	\$10,000	\$87	1	9	90	115	\$9,043	\$79	115	-10%
116	\$10,000	\$86	1	9	90	116	\$9,060	\$78	116	-9%
117	\$10,000	\$85	1	9	90	117	\$9,078	\$78	117	-9%
118	\$10,000	\$85	1	9	90	118	\$9,095	\$77	118	-9%
119	\$10,000	\$84	1	9	90	119	\$9,113	\$77	119	-9%
120	\$10,000	\$83	1	9	90	120	\$9,130	\$76	120	-9%
121	\$10,000	\$83	1	9	90	121	\$9,148	\$76	121	-9%
122	\$10,000	\$82	1	9	90	122	\$9,165	\$75	122	-8%
123	\$10,000	\$81	1	9	90	123	\$9,183	\$75	123	-8%
124	\$10,000	\$81	1	9	90	124	\$9,200	\$74	124	-8%
125	\$10,000	\$80	1	9	90	125	\$9,218	\$74	125	-8%
126	\$10,000	\$79	1	9	90	126	\$9,235	\$73	126	-8%
127	\$10,000	\$79	1	9	90	127	\$9,253	\$73	127	-7%
128	\$10,000	\$78	1	9	90	128	\$9,270	\$72	128	-7%
129	\$10,000	\$78	1	9	90	129	\$9,288	\$72	129	-7%
130	\$10,000	\$77	1	9	90	130	\$9,305	\$72	130	-7%
131	\$10,000	\$76	1	9	90	131	\$9,323	\$71	131	-7%
132	\$10,000	\$76	1	9	90	132	\$9,340	\$71	132	-7%
133	\$10,000	\$75	1	9	90	133	\$9,358	\$70	133	-6%
134	\$10,000	\$75	1	9	90	134	\$9,375	\$70	134	-6%
135	\$10,000	\$74	1	9	90	135	\$9,393	\$70	135	-6%
136	\$10,000	\$74	1	9	90	136	\$9,410	\$69	136	-6%
137	\$10,000	\$73	1	9	90	137	\$9,428	\$69	137	-6%
138	\$10,000	\$72	1	9	90	138	\$9,445	\$68	138	-6%

139	\$10,000	\$72	1	9	90	39	139	\$9,463	\$68	139	-5%
140	\$10,000	\$71	1	9	90	40	140	\$9,480	\$68	140	-5%
141	\$10,000	\$71	1	9	90	41	141	\$9,498	\$67	141	-5%
142	\$10,000	\$70	1	9	90	42	142	\$9,515	\$67	142	-5%
143	\$10,000	\$70	1	9	90	43	143	\$9,533	\$67	143	-5%
144	\$10,000	\$69	1	9	90	44	144	\$9,550	\$66	144	-5%
145	\$10,000	\$69	1	9	90	45	145	\$9,568	\$66	145	-4%
146	\$10,000	\$68	1	9	90	46	146	\$9,585	\$66	146	-4%
147	\$10,000	\$68	1	9	90	47	147	\$9,603	\$65	147	-4%
148	\$10,000	\$68	1	9	90	48	148	\$9,620	\$65	148	-4%
149	\$10,000	\$67	1	9	90	49	149	\$9,638	\$65	149	-4%
150	\$10,000	\$67	1	9	90	50	150	\$9,655	\$64	150	-3%
151	\$10,000	\$66	1	9	90	51	151	\$9,673	\$64	151	-3%
152	\$10,000	\$66	1	9	90	52	152	\$9,690	\$64	152	-3%
153	\$10,000	\$65	1	9	90	53	153	\$9,708	\$63	153	-3%
154	\$10,000	\$65	1	9	90	54	154	\$9,725	\$63	154	-3%
155	\$10,000	\$65	1	9	90	55	155	\$9,743	\$63	155	-3%
156	\$10,000	\$64	1	9	90	56	156	\$9,760	\$63	156	-2%
157	\$10,000	\$64	1	9	90	57	157	\$9,778	\$62	157	-2%
158	\$10,000	\$63	1	9	90	58	158	\$9,795	\$62	158	-2%
159	\$10,000	\$63	1	9	90	59	159	\$9,813	\$62	159	-2%
160	\$10,000	\$63	1	9	90	60	160	\$9,830	\$61	160	-2%
161	\$10,000	\$62	1	9	90	61	161	\$9,848	\$61	161	-2%
162	\$10,000	\$62	1	9	90	62	162	\$9,865	\$61	162	-1%
163	\$10,000	\$61	1	9	90	63	163	\$9,883	\$61	163	-1%
164	\$10,000	\$61	1	9	90	64	164	\$9,900	\$60	164	-1%
165	\$10,000	\$61	1	9	90	65	165	\$9,918	\$60	165	-1%
166	\$10,000	\$60	1	9	90	66	166	\$9,935	\$60	166	-1%
167	\$10,000	\$60	1	9	90	67	167	\$9,953	\$60	167	0%
168	\$10,000	\$60	1	9	90	68	168	\$9,970	\$59	168	0%
169	\$10,000	\$59	1	9	90	69	169	\$9,988	\$59	169	0%
170	\$10,000	\$59	1	9	90	70	170	\$10,005	\$59	170	0%
171	\$10,000	\$58	1	9	90	71	171	\$10,023	\$59	171	0%
172	\$10,000	\$58	1	9	90	72	172	\$10,040	\$58	172	0%
173	\$10,000	\$58	1	9	90	73	173	\$10,058	\$58	173	1%
174	\$10,000	\$57	1	9	90	74	174	\$10,075	\$58	174	1%
175	\$10,000	\$57	1	9	90	75	175	\$10,093	\$58	175	1%
200	\$10,000	\$50	1	9	90	100	200	\$10,530	\$53	200	5%
250	\$10,000	\$40	1	9	90	150	250	\$11,405	\$46	250	14%
280	\$10,000	\$36	1	9	90	180	280	\$11,930	\$43	280	19%
459	\$10,000	\$22	1	9	90	359	459	\$15,063	\$33	459	51%
500	\$10,000	\$20	1	9	90	400	500	\$15,780	\$32	500	58%
560	\$10,000	\$18	1	9	90	460	560	\$16,830	\$30	560	68%
700	\$10,000	\$14	1	9	90	600	700	\$19,280	\$28	700	93%
712	\$10,000	\$14	1	9	90	612	712	\$19,490	\$27	712	95%
750	\$10,000	\$13	1	9	90	650	750	\$20,155	\$27	750	102%
1,000	\$10,000	\$10	1	9	90	900	1,000	\$24,530	\$25	1,000	145%
1,400	\$10,000	\$7	1	9	90	1,300	1,400	\$31,530	\$23	1,400	215%
2,000	\$10,000	\$5	1	9	90	1,900	2,000	\$42,030	\$21	2,000	320%
2,100	\$10,000	\$5	1	9	90	2,000	2,100	\$43,780	\$21	2,100	338%
2,800	\$10,000	\$4	1	9	90	2,700	2,800	\$56,030	\$20	2,800	460%
5,000	\$10,000	\$2	1	9	90	4,900	5,000	\$94,530	\$19	5,000	845%
7,500	\$10,000	\$1	1	9	90	7,400	7,500	\$138,280	\$18	7,500	1283%
10,000	\$10,000	\$1	1	9	90	9,900	10,000	\$182,030	\$18	10,000	1720%

28,000	\$10,000	\$0	1	9	90	27,900	28,000	\$497,030	\$18	28,000	4870%
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Annual \$5,000
 Additional Scans
 Blk 1-9 \$70.00
 Blk 10-99 \$35.00
 Blk 100 up \$17.50

Annual \$19,500

PLATINUM SUBSCRIPTION

USPS PROPOSED (Weighted Average Number of Scans)

Weighted Average Number of Scans (Millions)	Millions of Units	Number of First-Class Scans per Unit	Number of Standard Scans per Unit	Total Annual Charge (\$)	First-Class Cost per Million Scans	Standard Cost per Million Scans	Weighted Average Cost per Million Scans (\$)	USPS vs. Current: Proposed Increase %
0.357	1	1	0.2	\$5,000	\$5,000	\$5,000	\$5,000	-50%
0.714	2	2	0.4	\$5,070	\$2,535	\$12,675	\$7,098	
1.071	3	3	0.6	\$5,140	\$1,713	\$8,567	\$4,797	
1.429	4	4	0.8	\$5,210	\$1,303	\$6,513	\$3,647	
1.786	5	5	1	\$5,280	\$1,056	\$5,280	\$2,957	
2.143	6	6	1.2	\$5,350	\$892	\$4,458	\$2,497	
2.500	7	7	1.4	\$5,420	\$774	\$3,871	\$2,168	
2.857	8	8	1.6	\$5,490	\$686	\$3,431	\$1,922	
3.214	9	9	1.8	\$5,560	\$618	\$3,089	\$1,730	
3.571	10	10	2	\$5,630	\$563	\$2,815	\$1,576	
3.929	11	11	2.2	\$5,665	\$515	\$2,575	\$1,442	
4.286	12	12	2.4	\$5,700	\$475	\$2,375	\$1,330	
4.643	13	13	2.6	\$5,735	\$441	\$2,206	\$1,235	
5.000	14	14	2.8	\$5,770	\$412	\$2,061	\$1,154	-42%
5.357	15	15	3	\$5,805	\$387	\$1,935	\$1,084	
5.714	16	16	3.2	\$5,840	\$365	\$1,825	\$1,022	
6.071	17	17	3.4	\$5,875	\$346	\$1,728	\$968	
6.429	18	18	3.6	\$5,910	\$328	\$1,642	\$919	
6.786	19	19	3.8	\$5,945	\$313	\$1,564	\$876	
7.143	20	20	4	\$5,980	\$299	\$1,495	\$837	
7.500	21	21	4.2	\$6,015	\$286	\$1,432	\$802	
7.857	22	22	4.4	\$6,050	\$275	\$1,375	\$770	
8.214	23	23	4.6	\$6,085	\$265	\$1,323	\$741	
8.571	24	24	4.8	\$6,120	\$255	\$1,275	\$714	
8.929	25	25	5	\$6,155	\$246	\$1,231	\$689	
9.286	26	26	5.2	\$6,190	\$238	\$1,190	\$667	
9.643	27	27	5.4	\$6,225	\$231	\$1,153	\$646	
10.000	28	28	5.6	\$6,260	\$224	\$1,118	\$626	-37%
10.357	29	29	5.8	\$6,295	\$217	\$1,085	\$608	
10.714	30	30	6	\$6,330	\$211	\$1,055	\$591	
11.071	31	31	6.2	\$6,365	\$205	\$1,027	\$575	
11.429	32	32	6.4	\$6,400	\$200	\$1,000	\$560	
11.786	33	33	6.6	\$6,435	\$195	\$975	\$546	
12.143	34	34	6.8	\$6,470	\$190	\$951	\$533	
12.500	35	35	7	\$6,505	\$186	\$929	\$520	
12.857	36	36	7.2	\$6,540	\$182	\$908	\$509	
13.214	37	37	7.4	\$6,575	\$178	\$889	\$498	
13.571	38	38	7.6	\$6,610	\$174	\$870	\$487	

**PLATINUM SUBSCRIPTION
OCA PROPOSED**

Number of First-Class Scans (Millions)	Total Annual Charge (\$)	Cost per Million Scans (\$)
1	\$19,500	\$19,500
2	\$19,500	\$9,750
3	\$19,500	\$6,500
4	\$19,500	\$4,875
5	\$19,500	\$3,900
6	\$19,500	\$3,250
7	\$19,500	\$2,786
8	\$19,500	\$2,438
9	\$19,500	\$2,167
10	\$19,500	\$1,950
11	\$19,500	\$1,773
12	\$19,500	\$1,625
13	\$19,500	\$1,500
14	\$19,500	\$1,393
15	\$19,500	\$1,300
16	\$19,500	\$1,219
17	\$19,500	\$1,147
18	\$19,500	\$1,083
19	\$19,500	\$1,026
20	\$19,500	\$975
21	\$19,500	\$929
22	\$19,500	\$886
23	\$19,500	\$848
24	\$19,500	\$813
25	\$19,500	\$780
26	\$19,500	\$750
27	\$19,500	\$722
28	\$19,500	\$696
29	\$19,500	\$672
30	\$19,500	\$650
31	\$19,500	\$629
32	\$19,500	\$609
33	\$19,500	\$591
34	\$19,500	\$574
35	\$19,500	\$557
36	\$19,500	\$542
37	\$19,500	\$527
38	\$19,500	\$513

**PLATINUM SUBSCRIPTION
% CHG: OCA vs CURRENT**

Number of First-Class Scans (Millions)	Proposed Increase %
1	95%
2	95%
3	95%
4	95%
5	95%
6	95%
7	95%
8	95%
9	95%
10	95%
11	95%
12	95%
13	95%
14	95%
15	95%
16	95%
17	95%
18	95%
19	95%
20	95%
21	95%
22	95%
23	95%
24	95%
25	95%
26	95%
27	95%
28	95%
29	95%
30	95%
31	95%
32	95%
33	95%
34	95%
35	95%
36	95%
37	95%
38	95%

13.929	39	39	7.8	\$6,645	\$170	\$852	\$477		39	\$19,500	\$500	39	95%
14.286	40	40	8	\$6,680	\$167	\$835	\$468		40	\$19,500	\$488	40	95%
14.643	41	41	8.2	\$6,715	\$164	\$819	\$459		41	\$19,500	\$476	41	95%
15.000	42	42	8.4	\$6,750	\$161	\$804	\$450	-33%	42	\$19,500	\$464	42	95%
15.357	43	43	8.6	\$6,785	\$158	\$789	\$442		43	\$19,500	\$453	43	95%
15.714	44	44	8.8	\$6,820	\$155	\$775	\$434		44	\$19,500	\$443	44	95%
16.071	45	45	9	\$6,855	\$152	\$762	\$427		45	\$19,500	\$433	45	95%
16.429	46	46	9.2	\$6,890	\$150	\$749	\$419		46	\$19,500	\$424	46	95%
16.786	47	47	9.4	\$6,925	\$147	\$737	\$413		47	\$19,500	\$415	47	95%
17.143	48	48	9.6	\$6,960	\$145	\$725	\$406		48	\$19,500	\$406	48	95%
17.500	49	49	9.8	\$6,995	\$143	\$714	\$400		49	\$19,500	\$398	49	95%
17.857	50	50	10	\$7,030	\$141	\$703	\$394		50	\$19,500	\$390	50	95%
18.214	51	51	10.2	\$7,065	\$139	\$693	\$388		51	\$19,500	\$382	51	95%
18.571	52	52	10.4	\$7,100	\$137	\$683	\$382		52	\$19,500	\$375	52	95%
18.929	53	53	10.6	\$7,135	\$135	\$673	\$377		53	\$19,500	\$368	53	95%
19.286	54	54	10.8	\$7,170	\$133	\$664	\$372		54	\$19,500	\$361	54	95%
19.643	55	55	11	\$7,205	\$131	\$655	\$367		55	\$19,500	\$355	55	95%
20.000	56	56	11.2	\$7,240	\$129	\$646	\$362	-28%	56	\$19,500	\$348	56	95%
20.357	57	57	11.4	\$7,275	\$128	\$638	\$357		57	\$19,500	\$342	57	95%
20.714	58	58	11.6	\$7,310	\$126	\$630	\$353		58	\$19,500	\$336	58	95%
21.071	59	59	11.8	\$7,345	\$124	\$622	\$349		59	\$19,500	\$331	59	95%
21.429	60	60	12	\$7,380	\$123	\$615	\$344		60	\$19,500	\$325	60	95%
21.786	61	61	12.2	\$7,415	\$122	\$608	\$340		61	\$19,500	\$320	61	95%
22.143	62	62	12.4	\$7,450	\$120	\$601	\$336		62	\$19,500	\$315	62	95%
22.500	63	63	12.6	\$7,485	\$119	\$594	\$333		63	\$19,500	\$310	63	95%
22.857	64	64	12.8	\$7,520	\$118	\$588	\$329		64	\$19,500	\$305	64	95%
23.214	65	65	13	\$7,555	\$116	\$581	\$325		65	\$19,500	\$300	65	95%
23.571	66	66	13.2	\$7,590	\$115	\$575	\$322		66	\$19,500	\$295	66	95%
23.929	67	67	13.4	\$7,625	\$114	\$569	\$319		67	\$19,500	\$291	67	95%
24.286	68	68	13.6	\$7,660	\$113	\$563	\$315		68	\$19,500	\$287	68	95%
24.643	69	69	13.8	\$7,695	\$112	\$558	\$312		69	\$19,500	\$283	69	95%
25.000	70	70	14	\$7,730	\$110	\$552	\$309	-23%	70	\$19,500	\$279	70	95%
25.357	71	71	14.2	\$7,765	\$109	\$547	\$306		71	\$19,500	\$275	71	95%
25.714	72	72	14.4	\$7,800	\$108	\$542	\$303		72	\$19,500	\$271	72	95%
26.071	73	73	14.6	\$7,835	\$107	\$537	\$301		73	\$19,500	\$267	73	95%
26.429	74	74	14.8	\$7,870	\$106	\$532	\$298		74	\$19,500	\$264	74	95%
26.786	75	75	15	\$7,905	\$105	\$527	\$295		75	\$19,500	\$260	75	95%
27.143	76	76	15.2	\$7,940	\$104	\$522	\$293		76	\$19,500	\$257	76	95%
27.500	77	77	15.4	\$7,975	\$104	\$518	\$290		77	\$19,500	\$253	77	95%
27.857	78	78	15.6	\$8,010	\$103	\$513	\$288		78	\$19,500	\$250	78	95%
28.214	79	79	15.8	\$8,045	\$102	\$509	\$285		79	\$19,500	\$247	79	95%
28.571	80	80	16	\$8,080	\$101	\$505	\$283		80	\$19,500	\$244	80	95%
28.929	81	81	16.2	\$8,115	\$100	\$501	\$281		81	\$19,500	\$241	81	95%
29.286	82	82	16.4	\$8,150	\$99	\$497	\$278		82	\$19,500	\$238	82	95%
29.643	83	83	16.6	\$8,185	\$99	\$493	\$276		83	\$19,500	\$235	83	95%
30.000	84	84	16.8	\$8,220	\$98	\$489	\$274	-18%	84	\$19,500	\$232	84	95%
30.357	85	85	17	\$8,255	\$97	\$486	\$272		85	\$19,500	\$229	85	95%
30.714	86	86	17.2	\$8,290	\$96	\$482	\$270		86	\$19,500	\$227	86	95%
31.071	87	87	17.4	\$8,325	\$96	\$478	\$268		87	\$19,500	\$224	87	95%
31.429	88	88	17.6	\$8,360	\$95	\$475	\$266		88	\$19,500	\$222	88	95%

31.786	89	89	17.8	\$8,395	\$94	\$472	\$264		89	\$19,500	\$219	89	95%
32.143	90	90	18	\$8,430	\$94	\$468	\$262		90	\$19,500	\$217	90	95%
32.500	91	91	18.2	\$8,465	\$93	\$465	\$260		91	\$19,500	\$214	91	95%
32.857	92	92	18.4	\$8,500	\$92	\$462	\$259		92	\$19,500	\$212	92	95%
33.214	93	93	18.6	\$8,535	\$92	\$459	\$257		93	\$19,500	\$210	93	95%
33.571	94	94	18.8	\$8,570	\$91	\$456	\$255		94	\$19,500	\$207	94	95%
33.929	95	95	19	\$8,605	\$91	\$453	\$254		95	\$19,500	\$205	95	95%
34.286	96	96	19.2	\$8,640	\$90	\$450	\$252		96	\$19,500	\$203	96	95%
34.643	97	97	19.4	\$8,675	\$89	\$447	\$250		97	\$19,500	\$201	97	95%
35.000	98	98	19.6	\$8,710	\$89	\$444	\$249	-13%	98	\$19,500	\$199	98	95%
35.357	99	99	19.8	\$8,745	\$88	\$442	\$247		99	\$19,500	\$197	99	95%
35.714	100	100	20	\$8,780	\$88	\$439	\$246		100	\$19,500	\$195	100	95%
36.071	101	101	20.2	\$8,798	\$87	\$436	\$244		101	\$19,500	\$193	101	95%
36.429	102	102	20.4	\$8,815	\$86	\$432	\$242		102	\$19,500	\$191	102	95%
36.786	103	103	20.6	\$8,833	\$86	\$429	\$240		103	\$19,500	\$189	103	95%
37.143	104	104	20.8	\$8,850	\$85	\$425	\$238		104	\$19,500	\$188	104	95%
37.500	105	105	21	\$8,868	\$84	\$422	\$236		105	\$19,500	\$186	105	95%
37.857	106	106	21.2	\$8,885	\$84	\$419	\$235		106	\$19,500	\$184	106	95%
38.214	107	107	21.4	\$8,903	\$83	\$416	\$233		107	\$19,500	\$182	107	95%
38.571	108	108	21.6	\$8,920	\$83	\$413	\$231		108	\$19,500	\$181	108	95%
38.929	109	109	21.8	\$8,938	\$82	\$410	\$230		109	\$19,500	\$179	109	95%
39.286	110	110	22	\$8,955	\$81	\$407	\$228		110	\$19,500	\$177	110	95%
39.643	111	111	22.2	\$8,973	\$81	\$404	\$226		111	\$19,500	\$176	111	95%
40.000	112	112	22.4	\$8,990	\$80	\$401	\$225	-10%	112	\$19,500	\$174	112	95%
40.357	113	113	22.6	\$9,008	\$80	\$399	\$223		113	\$19,500	\$173	113	95%
40.714	114	114	22.8	\$9,025	\$79	\$396	\$222		114	\$19,500	\$171	114	95%
41.071	115	115	23	\$9,043	\$79	\$393	\$220		115	\$19,500	\$170	115	95%
41.429	116	116	23.2	\$9,060	\$78	\$391	\$219		116	\$19,500	\$168	116	95%
41.786	117	117	23.4	\$9,078	\$78	\$388	\$217		117	\$19,500	\$167	117	95%
42.143	118	118	23.6	\$9,095	\$77	\$385	\$216		118	\$19,500	\$165	118	95%
42.500	119	119	23.8	\$9,113	\$77	\$383	\$214		119	\$19,500	\$164	119	95%
42.857	120	120	24	\$9,130	\$76	\$380	\$213		120	\$19,500	\$163	120	95%
43.214	121	121	24.2	\$9,148	\$76	\$378	\$212		121	\$19,500	\$161	121	95%
43.571	122	122	24.4	\$9,165	\$75	\$376	\$210		122	\$19,500	\$160	122	95%
43.929	123	123	24.6	\$9,183	\$75	\$373	\$209		123	\$19,500	\$159	123	95%
44.286	124	124	24.8	\$9,200	\$74	\$371	\$208		124	\$19,500	\$157	124	95%
44.643	125	125	25	\$9,218	\$74	\$369	\$206		125	\$19,500	\$156	125	95%
45.000	126	126	25.2	\$9,235	\$73	\$366	\$205	-8%	126	\$19,500	\$155	126	95%
45.357	127	127	25.4	\$9,253	\$73	\$364	\$204		127	\$19,500	\$154	127	95%
45.714	128	128	25.6	\$9,270	\$72	\$362	\$203		128	\$19,500	\$152	128	95%
46.071	129	129	25.8	\$9,288	\$72	\$360	\$202		129	\$19,500	\$151	129	95%
46.429	130	130	26	\$9,305	\$72	\$358	\$200		130	\$19,500	\$150	130	95%
46.786	131	131	26.2	\$9,323	\$71	\$356	\$199		131	\$19,500	\$149	131	95%
47.143	132	132	26.4	\$9,340	\$71	\$354	\$198		132	\$19,500	\$148	132	95%
47.500	133	133	26.6	\$9,358	\$70	\$352	\$197		133	\$19,500	\$147	133	95%
47.857	134	134	26.8	\$9,375	\$70	\$350	\$196		134	\$19,500	\$146	134	95%
48.214	135	135	27	\$9,393	\$70	\$348	\$195		135	\$19,500	\$144	135	95%
48.571	136	136	27.2	\$9,410	\$69	\$346	\$194		136	\$19,500	\$143	136	95%
48.929	137	137	27.4	\$9,428	\$69	\$344	\$193		137	\$19,500	\$142	137	95%
49.286	138	138	27.6	\$9,445	\$68	\$342	\$192		138	\$19,500	\$141	138	95%

49.643	139	139	27.8	\$9,463	\$68	\$340	\$191		139	\$19,500	\$140	139	95%
50.000	140	140	28	\$9,480	\$68	\$339	\$190	-5%	140	\$19,500	\$139	140	95%
50.357	141	141	28.2	\$9,498	\$67	\$337	\$189		141	\$19,500	\$138	141	95%
50.714	142	142	28.4	\$9,515	\$67	\$335	\$188		142	\$19,500	\$137	142	95%
51.071	143	143	28.6	\$9,533	\$67	\$333	\$187		143	\$19,500	\$136	143	95%
51.429	144	144	28.8	\$9,550	\$66	\$332	\$186		144	\$19,500	\$135	144	95%
51.786	145	145	29	\$9,568	\$66	\$330	\$185		145	\$19,500	\$134	145	95%
52.143	146	146	29.2	\$9,585	\$66	\$328	\$184		146	\$19,500	\$134	146	95%
52.500	147	147	29.4	\$9,603	\$65	\$327	\$183		147	\$19,500	\$133	147	95%
52.857	148	148	29.6	\$9,620	\$65	\$325	\$182		148	\$19,500	\$132	148	95%
53.214	149	149	29.8	\$9,638	\$65	\$323	\$181		149	\$19,500	\$131	149	95%
53.571	150	150	30	\$9,655	\$64	\$322	\$180		150	\$19,500	\$130	150	95%
53.929	151	151	30.2	\$9,673	\$64	\$320	\$179		151	\$19,500	\$129	151	95%
54.286	152	152	30.4	\$9,690	\$64	\$319	\$179		152	\$19,500	\$128	152	95%
54.643	153	153	30.6	\$9,708	\$63	\$317	\$178		153	\$19,500	\$127	153	95%
55.000	154	154	30.8	\$9,725	\$63	\$316	\$177	-3%	154	\$19,500	\$127	154	95%
55.357	155	155	31	\$9,743	\$63	\$314	\$176		155	\$19,500	\$126	155	95%
55.714	156	156	31.2	\$9,760	\$63	\$313	\$175		156	\$19,500	\$125	156	95%
56.071	157	157	31.4	\$9,778	\$62	\$311	\$174		157	\$19,500	\$124	157	95%
56.429	158	158	31.6	\$9,795	\$62	\$310	\$174		158	\$19,500	\$123	158	95%
56.786	159	159	31.8	\$9,813	\$62	\$309	\$173		159	\$19,500	\$123	159	95%
57.143	160	160	32	\$9,830	\$61	\$307	\$172		160	\$19,500	\$122	160	95%
57.500	161	161	32.2	\$9,848	\$61	\$306	\$171		161	\$19,500	\$121	161	95%
57.857	162	162	32.4	\$9,865	\$61	\$304	\$171		162	\$19,500	\$120	162	95%
58.214	163	163	32.6	\$9,883	\$61	\$303	\$170		163	\$19,500	\$120	163	95%
58.571	164	164	32.8	\$9,900	\$60	\$302	\$169		164	\$19,500	\$119	164	95%
58.929	165	165	33	\$9,918	\$60	\$301	\$168		165	\$19,500	\$118	165	95%
59.286	166	166	33.2	\$9,935	\$60	\$299	\$168		166	\$19,500	\$117	166	95%
59.643	167	167	33.4	\$9,953	\$60	\$298	\$167		167	\$19,500	\$117	167	95%
60.000	168	168	33.6	\$9,970	\$59	\$297	\$166	0%	168	\$19,500	\$116	168	95%
60.357	169	169	33.8	\$9,988	\$59	\$295	\$165		169	\$19,500	\$115	169	95%
60.714	170	170	34	\$10,005	\$59	\$294	\$165		170	\$19,500	\$115	170	95%
61.071	171	171	34.2	\$10,023	\$59	\$293	\$164		171	\$19,500	\$114	171	95%
61.429	172	172	34.4	\$10,040	\$58	\$292	\$163		172	\$19,500	\$113	172	95%
61.786	173	173	34.6	\$10,058	\$58	\$291	\$163		173	\$19,500	\$113	173	95%
62.143	174	174	34.8	\$10,075	\$58	\$290	\$162		174	\$19,500	\$112	174	95%
62.500	175	175	35	\$10,093	\$58	\$288	\$161		175	\$19,500	\$111	175	95%
71.429	200	200	40	\$10,530	\$53	\$263	\$147		200	\$19,500	\$98	200	95%
89.286	250	250	50	\$11,405	\$46	\$228	\$128		250	\$19,500	\$78	250	95%
100.000	280	280	56	\$11,930	\$43	\$213	\$119	19%	280	\$19,500	\$70	280	95%
163.929	459	459	91.8	\$15,063	\$33	\$164	\$92		459	\$19,500	\$42	459	95%
178.571	500	500	100	\$15,780	\$32	\$158	\$88		500	\$19,500	\$39	500	95%
200.000	560	560	112	\$16,830	\$30	\$150	\$84	68%	560	\$19,500	\$35	501	95%
250.000	700	700	140	\$19,280	\$28	\$138	\$77	93%	700	\$19,500	\$28	700	95%
254.286	712	712	142.4	\$19,490	\$27	\$137	\$77		712	\$19,500	\$27	712	95%
267.857	750	750	150	\$20,155	\$27	\$134	\$75		750	\$19,500	\$26	750	95%
357.143	1,000	1,000	200	\$24,530	\$25	\$123	\$69		1,000	\$19,500	\$20	1,000	95%
500.000	1,400	1,400	280	\$31,530	\$23	\$113	\$63	215%	1,400	\$19,500	\$14	1,400	95%
714.286	2,000	2,000	400	\$42,030	\$21	\$105	\$59		2,000	\$19,500	\$10	2,000	95%
750.000	2,100	2,100	420	\$43,780	\$21	\$104	\$58	338%	2,100	\$19,500	\$9	2,100	95%
1,000.000	2,800	2,800	560	\$56,030	\$20	\$100	\$56	460%	2,800	\$19,500	\$7	2,800	95%
1,785.714	5,000	5,000	1000	\$94,530	\$19	\$95	\$53		5,000	\$19,500	\$4	5,000	95%
2,678.571	7,500	7,500	1500	\$138,280	\$18	\$92	\$52		7,500	\$19,500	\$3	7,500	95%
3,571.429	10,000	10,000	2000	\$182,030	\$18	\$91	\$51		10,000	\$19,500	\$2	10,000	95%

10,000.000	28,000	28,000	5600	\$497,030	\$18	\$89	\$50	4870%	28,000	\$19,500	\$1	28,000	95%
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Table 1
CONFIRM SERVICE
USPS Proposed Fees

Annual User Fee	\$5,000
Additional Block User Fee (per 1 million "units")	
Blocks 1 - 9	\$70.00
Block 10 - 99	\$35.00
Blocks 100 +	\$17.50
Additional ID Code Fees	
Annual	\$2,000
Quarterly	\$750
Units per Scan	
First-Class Mail	1
Other Mail Classes	5

Table 2
CONFIRM SERVICE
Comparison of Current Fees, and Proposed Fees of USPS and OCA

	Current Fees	USPS Proposed		OCA Proposed	
		Fees	% Change	Fees	% Change
Subscriber/Annual User Fee					
Silver (3 Month)	\$2,000	\$5,000	Varies	\$2,000	0.0%
Gold	\$4,500	\$5,000	11.1%	\$5,200	15.6%
Platinum	\$10,000	\$5,000	-50.0%	\$19,500	95.0%
Additional Block User Fee (per 1 million "units")					
Blocks 1 - 9	NA	\$70.00	NA	NA	NA
Blocks 10 - 99	NA	\$35.00	NA	NA	NA
Blocks 100 +	NA	\$17.50	NA	NA	NA
Additional Block Scan Fee					
Silver (blocks of 2 million)	\$500	NA	NA	\$500	0.0%
Gold (blocks of 6 million)	\$750	NA	NA	\$750	0.0%
Additional ID Code Fees					
Quarterly	\$500	\$750	50.0%	\$750	50.0%
Annual	\$2,000	\$2,000	0.0%	\$2,000	0.0%
Cost Coverage			126.3%		127.3%

