

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY
WASHINGTON, D.C.**

In the matter of the)
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Intra-Alaska Bush Service Mail Rates) **Docket 14694**
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**REPLY OF THE
CONSOLIDATED CARRIERS
TO THE COMMENTS OF THE
U.S. POSTAL SERVICE AND
PENINSULA AIRWAYS, INC.
AND PETITION FOR RECONSIDERATION
OF ORDER 2005-3-27**

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July 29, 2005

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The Consolidated Carriers (Carriers) hereby reply to the Comments of the U.S. Postal Service (Postal Service) and Peninsula Airways, Inc. (Penair) filed in response to Order 2005-6-6 in this docket. The Carriers also request reconsideration of Order 2005-3-27 to the limited extent as to require the U.S. Postal Service to extend any negotiated rate in a class to all other carriers operating aircraft of that class upon application.

Introduction

Both the Postal Service and Penair propose significant changes in the methodology and form of bush service mail rates. These changes are contrary to historic ratemaking standards, and do not comply with the letter or intent of the Rural Service Improvement Act. Neither party provides any data or other support for its assertions, nor do the

Comments meet the requirement of Order 2005-6-6 to "...include all proposed adjustments and backup data..." The comments of these two parties are designed to achieve the limited goal of benefiting only that party without regard to setting fair and compensatory industry mail rates as required by law.

The effects of the Rural Service Improvement Act have been dramatic. Six certificated carriers have gone out of business or been sold and relocated. Many productive employees have lost their jobs, passenger fares have increased, and the net worth of the bush industry all but disappeared. For the Department, the cost of providing Essential Air Service to bush points has increased by a significant percentage as the operating losses of the carriers involved have increased. The changes in the law and tender procedures have changed dynamically with new requirements and the carrier responses to those requirements and mail tender. The Postal Service doesn't even publish its dispatch procedures any more. The PO-508 manual that existed at the time of the Act's application is obsolete, and the Postal Service says it cannot keep up with additional changes in the law as well as its own evolving methods to tell the carriers how the system works. Given the chaos imposed upon the system by the Postal Service, it is truly ironic that it is requesting further changes without even understanding or documenting the current rate structure. It was the Postal Service itself that agreed that the current Part 121 regular airport rate is not compensatory, and voluntarily agreed to a 40% markup of the rate.

While the problems are many, there are two simple solutions that will allow the Department the time and data to analyze whether the current rates are fair and compensatory at some future date, and if any changes need to be made. First, the Department must use current and accurate costs to determine future rates. The Department used data that were nine months out of date when the Order was issued. Moreover, the rate included carriers that are no longer in business. The second solution is to reconsider Order 2005-3-27 and allow carriers to “opt in” to negotiated rates in the class of service they provide. These two changes would provide fair and compensatory rates for the industry as a whole, and give Penair an adequate rate without corrupting the bush ratemaking process.

Penair and the Postal Service Would Uncouple Mail Rates from the Cost of Transporting Mail

As noted above, both the Postal Service and Penair seek changes in rates that would benefit each party alone, and are inconsistent with the Department’s mandate to provide fair and compensatory rates within the requirements of the Rural Service Improvement Act. The Postal Service simply wants lower mail rates, but has provided no documentation or proof of any inadequacy of the current rate method. The Carriers argue that before any reconsideration of the current ratemaking methodology is undertaken, any party requesting a change must comply with 14CFR302.702(b) which requires “The petition will set forth the rate or rates sought to be established, a statement that they are believed to be fair and reasonable, the reasons supporting the request for a change in

rates, and a detailed economic justification sufficient to establish the reasonableness of the rate or rates proposed.” The Postal Service Comments do not attempt to meet these standards. Unless and until there is any showing that the current methodology is flawed, the Department should not reconsider the ratemaking system.

A primary shortcoming of the Rural Service Improvement Act is that it hypothesizes a future air service system that is strikingly different than the current or past systems. It requires certain changes in ratemaking methodology that will become appropriate only if the changes actually occur. The problem that Peninsula and only Peninsula suffers from is that the mail rates it is being paid are clearly inadequate and are being paid to it alone. The great paradox is that standard Part 121 linehaul rates are based on costs of Frontier, but Frontier has successfully shown to the Postal Service that those rates needed to be increased by at least 40% to be compensatory. On the other hand, the only carrier actually being paid the standard Part 121 rate was not included in the ratemaking process. While the Department correctly excluded Penair’s cost data; the paradox is that Penair is not included in the negotiated rate being paid to Frontier.

Postal Service Rate Arguments

The Postal Service resurrects is previously rejected arguments that there should be a single Part 121 rate, that non-mail operations should be used to determine mail rates, and that the return and tax allowance is too high. No evidence is provided to support the Comments, and the verbal arguments are sophistry. The two Part 121 rates are not based

on routes, but on aircraft and airport requirements. The Rural Service Improvement Act and historic ratemaking standards recognize that markedly different aircraft types have different cost characteristics. Mainline aircraft as a group have markedly different costs compared to bush aircraft. Seaplanes have markedly different costs than wheel planes. In applying rates, the Department applies the lowest applicable rate for the actual service involved. Every seaplane operator in the rate structure uses seaplanes to serve points where wheel plane service can be or is operated. By Department order, the applicable rate to those points is the wheel plane rate regardless of the actual equipment operated. If Era were to operate mail service with its DHC-6 "Twin Otter" aircraft to a point with a 4,000' runway, it would be paid at the lower standard Part 121 rate. If the runway at a current STOL rate point is extended to 4,000' or more, the standard Part 121 rate would then apply regardless of the type of aircraft Era would operate there. The Part 121 rates are not carrier or route based; they are aircraft and airport based. The relationship between the standard 121 rate and the STOL airport 121 rate is precisely the same as the relationship the R.S.I.A. clearly recognizes between wheel planes and seaplanes.

The argument that non-mail operations should be included in setting mail rates is equally specious and fallacious as well. The Department already includes the lower cost non-mail service in its cost estimates because it includes all commercial operations in determining carrier system unit costs. The Postal Service gets a break because cost reports do not differentiate between lower cost non-mail services and higher cost mail services. Previously the Carriers have documented examples of requirements and costs due to mail service alone. The Department determined that it could not accurately

differentiate among the services. The Postal Service also gets a break because the portion of cost assigned to each traffic type is based on round trip loads, even though 90% of all mail is outbound from the hub. The costs of the empty capacity on the inbound flight that was occupied on the outbound flight by mail is assigned to the passenger and freight pools. The Rural Service Improvement Act specifically excludes certain costs that are required in order to participate in the passenger mail pool. Even if the special breaks favoring the Postal Service in ratemaking methodology were eliminated, the R.S.I.A. would still assure that the Postal Service does not pay for all of the costs transportation of mail entails.

The argument raised about rate of return boils down to: the Postal Service has no evidence of what the correct rate of return is; it is not willing to do any research or provide evidence of what the correct rate of return should be; but it wants somebody else to do all the lifting to see if the rate could be lowered. The Carriers have made the contrary argument, but at least pointed to the actual costs and profits being experienced by mail carriers. Unless and until the Postal Service meets the requirements of 14CFR302.700, no action at all should be undertaken concerning the rate of return element.

Peninsula Airways Argument

Penair is understandably frustrated by the application of the current rate, and the imposition of a further rate reduction. The Carriers agree that Penair is not being paid at

a compensatory rate, but that the solution suggested by Penair is simply a further corruption of standard ratemaking methodology. The Carriers do not believe that Penair should suffer alone or disproportionately, but a much simpler solution is available to the Department.

In proposing changes in ratemaking procedure, Penair does not challenge exclusion of non-bush or non-mail operations. Under its proposal, Penair would still exclude its own costs from the ratemaking base. In seeking a higher rate, Penair would meld the different costs of STOL and non-STOL service into a single rate to be applied to Penair's non-STOL operations. Penair's pay would go up, Era's pay would go down, and Frontier's pay wouldn't be affected at all. Like the proverbial balloon, if you push in one side the opposite side expands. While total Part 121 mail pay would remain the same, Penair's gain would be offset by Era's losses. The problem is that Penair is not being paid enough, period. Moreover, the Postal Service recognizes this.

Penair points out the mathematical manipulation of the rate caused by the temporary increase in aircraft and capacity utilization realized by Frontier. Additionally, the Postal Service has further salted the mine by tendering more mail to Frontier than set by the terms of the Rural Service Improvement Act. T-100 reports for competitive markets served by Frontier's Part 121 aircraft show that Frontier was tendered mail far in excess of the formula set out in the R.S.I.A. (Appendix A). The Postal Service accomplished this by denying tender of mail to properly qualified carriers, or by assigning all inhouse and transfer mail to Frontier only. The assumedly unintended consequence of this gambit

was that increased mail tender led to increased operating losses for Frontier. The Carriers agree that the Frontier costs used in Order 2005-6-6 are not representative of a long term operation and should be discarded. An official rate freeze for standard Part 121 service is justified.

The simple and consistent solution is to require the Postal Service to pay its negotiated rate to any carrier in the rate class that requests it. As explained more fully below, such an “opt in” program would allow carriers to participate in already agreed to rates. In no case would the Postal Service pay more than it have already accepted, and could pay less if the carrier does not desire the rate.

Creating a Compensatory Rate

The Department is required by law and regulation to set fair and compensatory mail rates. While the protesting parties differ on how the rates are unfair, they both assert that the proposed rates are unfair. There is no question that the rates are not compensatory. Furthermore, it is clear that the Department had far more current data that more accurately reflects the conditions of mail carriage in Alaska. Order 2005-6-6 was issued one month after data for the three months ended March 31, 2005 was in hand. By using data for the year ended June 30, 2004, the Department used data nine months out of date. The Postal Service implemented its new dispatch procedures for bypass mail in November, 2003, so the ratemaking period included only seven months of service under the Rural Service Improvement Act requirements.

There is no legal or analytical reason to use such obsolete data. The fact that the original rate used data for Y.E. June 30, 2003 is no reason to use June, 2004 data for updates being put in place more than a year after the first rates were proposed (Order 2004-2-. What is important is the period to which the rates will apply, which the Department has set to end December 31, 2005. The issue is what period most accurately reflects the current and projected costs of transporting mail. Appendices B, C and D apply the exact methodology employed in Order 2005-6-6 to the data for the 12 months ended March 31, 2005. The rates the Department should have proposed, using the accepted criteria and the most recent data are \$11.25735 per ton mile for Part 135 wheel planes, \$24.19596 per ton/mile for Part 135 seaplanes, and \$950.54 per enplaned ton as a terminal charge for all classes of bush mail.

The last Mainline rate order was 2004-8-26 issued August 23, 2004 based on data for the year ended March 31, 2004, and then increased to the midpoint of the new rate period. Ten months later the Department issued Order 2004-6-6 based on data only three months newer, and didn't apply any cost escalation for the bush carriers. In short, the Department is asking the carriers to absorb the cost increases of nine months. Moreover, the cost year actually used by the Department did not fully reflect the changes in dispatch and Postal procedures brought about by the Rural Service Improvement Act.

This is the same situation that applied to the bush industry when the first rate orders were issued beginning with Order 2004-2- (Part 121 mail rates). Carriers had to accept rates

which the Department later ruled inadequate for periods of up to ten months. Adequate rates were not applied retroactively. The rates proposed in Order 2004-6-6 will result in a multi-million dollar shortfall for the carriers, and further financial damage.

Review of Bush Rates

Both the Department's Order and the Postal Service Comments seem to assume that a review of the bush mail rates structure will be undertaken in the foreseeable future. The Rural Service Improvement Act authorizes the Department to review rates no more than once every two years, but does not require such a review. The R.S.I.A. went into effect in November, 2003, and was changed again, at Postal Service request, in 2004. There are no data reflecting the costs of the current requirements of the law. In fact, the Postal Service has not even issued a procedures manual covering the provisions of the R.S.I.A.. The PO-508 procedures manual currently carried on the official Postal Service website (go to <http://www.usps.com> and search for PO-508 in the Search box) was issued in January, 2000, and has been obsolete since November, 2002. The Postal Service first began promising to release a new PO-508 based on the R.S.I.A. in February, 2003, and has renewed that promise at every public meeting since without result. The Postal Service has been woefully derelict in meeting both its responsibilities and its promises. Even after the Postal Service does codify its procedures, the effects will not be completely felt for some time. It is incredible to consider any review of the rate structure until after the Postal Service has met its responsibility, and the effects of those changes reflected in the operations of the carriers. The Carriers request that no change in bush

ratemaking procedures be considered until two years after the Postal Service has submitted its procedures manual to the carriers and the Secretary.

Change in Application of Bush Rates

The Postal Service includes a vague statement about changing the way it pays mail rates and will discuss the changes with the carriers involved. Neither the Postal Service nor the carriers can pay or accept mail rates less than those ordered by the Department. The Department is the only authority on the application of mail rates. In the past the Postal Service has paid rates that were not consistent with the Department orders. At least twice in the recent past the Department has had to order the Postal Service to correct its method of paying rates. The Carriers request that any change in payment methodology made by the Postal Service must be first approved by the Department. Perhaps the Postal Service was proposing to pay rates above the current level, but the actual intent and proposed changes were not made clear. If the Postal Service wishes to pay rates above the currently authorized level they are free to do so without making comment. If the proposed changes would reduce the level of pay from current levels, the Department must first find that the changes comply with its orders.

An excellent example of how the Postal Service is not complying with current mail rates is the way it pays composite equalization rate to bush carriers. As discussed in Order 2003-10-10 in Issue 9, the R.S.I.A. requires payment of the full bush rate over the route operated with bush aircraft, and that the total rate must be based on the sum of the

mainline rate plus the applicable bush rate. Ironically, the Order assumes that the definition of the applicable rate is not as important as the fact that the Postal Service must base its tender on the specific origin and destination involved in the equalization notice. In fact, the actual method of tender used by the Postal Service ignores market shares in the markets at issue and uses shares in a city-pair not even served by the equalizing carrier.

Petition for Reconsideration

The Carriers request reconsideration of Order 2005-327 to extent necessary to require the Postal Service to pay the negotiated rate in any rate category to all carriers operating service in the category if a carrier requests inclusion. This should be done to assure equal treatment to all carriers of a class, and to prevent unjustly discriminatory actions by the Postal Service. The original application of Frontier was defined so narrowly as to include only routes served by Frontier and to exclude all bush routes served by Penair. After the Department approved the request to set rates above the D.O.T. rate, only one route served by Penair was included, and that was only because Frontier also served the route. The agreement included 25 routes where Frontier was the only carrier providing Part 121 service. This clearly raises the question about favoritism and undue preference by the Postal Service for Frontier.

Throughout this proceeding, the Postal Service has consistently sought to reduce the rates paid to Peninsula Airways and Era Aviation, while supporting requests from Frontier

Flying Service for a 40% rate increase for that carrier alone. The Postal Service granted Frontier a waiver to serve hubs where it had no service history at all, while subsequently denying a similar waiver request from Era to be tendered mail in a market where it had a long history of service. The stated reason that Era had not established the requisite market share in prior service is specious. If Era had qualified on the basis of its traffic, it would not have required a waiver. In the case of Frontier, the Postal Service granted a waiver where the carrier had no market history, and continued to tender mail to it in markets where it had not met the qualification requirements even after the waiver had expired. Indeed, the Postal Service continues to tender mail to Frontier in three markets where its still doesn't qualify for tender seven months after the expiration of its waiver (Appendix A). The Carriers agree that participation in the higher rates should be voluntary, but that the rate should be made available to all carriers on a voluntary basis that provide service covered by the class covered by the agreement. Both the rate concerns of Penair, and the application of rates without unjust discrimination can be satisfied by requiring the Postal Service to include any route specified by a carrier covered by the base rate being superseded by agreement.

WHEREFORE: the Consolidated Carriers oppose the requests of the Postal Service and Penair to set a single Part 121 rate, and also oppose the request of the Postal Service to include non-mail service in constructing mail service rates, and to reconsider the rate of return element previously set by the Department. Further, the Carriers request review of Order 2005-3-27 to extent necessary to include all carriers and routes covered by the standard Part 121 rate (or covered by any other rate subject to future negotiated rates)

upon application by the carrier. The Carriers oppose any change in bush ratemaking methodology until two years after the Postal Service has issued a new PO-508 Procedures Manual documenting the requirements it imposes on participating carriers. Finally, the Carriers request the Department set to Part 135 wheel plane linehaul rate at \$11.25735 per ton mile, the Part 135 seaplane rate at \$24.19596 per ton mile, and the terminal charge applicable to all bush service at \$950.54 per ton enplaned, and that these rates shall remain in effect until December 31, 2005, or further notice. The bush carriers should not be paid inadequate rates due simply to administrative delay.

The Department has historically accepted all reply or rebuttal comments filed in this docket within a reasonable time frame. Order 2005-6-6 invites a broad participation of comments, and the Carriers have been a consistent participant in all bush rate proceedings. To the extent that this Reply might be considered an unauthorized document, the Carriers request Leave to File and Unauthorized Document pursuant to Rule 6(c). Clearly this filing provides substantial information of value, and addresses issues raised by parties and not addressed in Order 2005-6-6. Alternatively, the Carriers ask that this filing be accepted as original Comments to the Order although filed late. The delay of four business days does not unduly delay the proceeding nor affect the rights of any other party. It must be noted that this filing by the Carriers is the only document to meet the requirement of Order 2005-6-6 to "...include all proposed adjustments and backup data...". Neither Penair nor the Postal Service included any data, specific adjustments, or findings of legal or regulatory precedent supporting their requests, yet those filings were accepted into the Docket. The Carriers do not question

the acceptance of those filings, but simply request that its filing, which does meet the requirements, be accepted as well.

Respectfully submitted

The Consolidated Carriers

By Hank Myers

July 29, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Reply of the Consolidated Carriers upon all parties to this docket.

Hank Myers

July 29, 2005

**Examples of Markets Where the
Postal Service Tenders Significantly More
Mail to Frontier Flying Service than
The Rural Service Improvement Act Requires**

Origin Destination	Frontier Pax Share	Frontier Pool Assignment	Mail Tendered
OME GAM	11.8%	10% Other Pool (with 6C)	21.27%
OME SVA	14.5%	10% Other Pool (with 6C)	18.74%
OTZ WTK	6.7%	10% Other Pool (with 6C, 8Q)	22.07%

Source: T-100 Market Reports YE March 31, 2005 released by B.T.C.

**PART 135 WHEELPLANE LINEHAUL RATES
YE MARCH 31, 2005**

System Parameters for Each Carrier

	<u>TOTALS</u>	<u>A. Circle</u>	<u>A. Circle</u>	<u>A. Circle</u>	<u>A. Circle</u>
1. Capacity Related Expense (CR), Skd F-2		\$598,145			
2. Direct Expense including fuel, Skd F-2		\$8,459,846			
3. Indirect Expense including CR, Skd F-2		\$1,739,705			
4. Capacity Related Markup		1.0623			
5. T-100 Scheduled (F) Mail RTM's, Market		77349			
6. T-100 Scheduled (F) Mail RTM's, Segment		112415			
7. Circuity Markup		1.4533			
Aircraft Name		C-206	C-402	C-208	King Air
<u>Aircraft Code</u>		035	125	416	457
8. <u>Total Direct Expense</u>		\$1,370,469	\$1,997,698	\$554,866	\$2,217,274
9. Passenger Liability Insurance		\$41,431	\$37,868	\$10,660	\$6,843
10. Allocable to Mail (Total minus Pax Liab. Ins.)		\$1,329,038	\$1,959,830	\$544,206	\$2,210,431
11. Unit Costs per Block Hour		\$352.99	\$391.51	\$760.81	\$645.00
<u>Markups per Carrier system Parameters</u>					
12. Linehaul + Capacity Related Markup		\$1,411,834	\$2,081,923	\$578,109	\$2,348,136
13. Line 12 plus markup for Return and Tax		\$1,545,393	\$2,278,873	\$632,798	\$2,570,269
14. Line 13 plus markup for Circuity		\$2,245,983	\$3,311,977	\$919,671	\$3,735,476
15. Unit Costs per Block Hour		\$596.53	\$661.63	\$1,285.71	\$1,090.01
16. System Revenue Block Hours		3765.1	5005.8	715.3	3427.0
17. Eligible Block Hours (Class F)		597.5	2556.6	142.5	452.0
18. Eligible Linehaul Expense		\$356,425	\$1,691,518	\$183,214	\$492,686
Eligible Pax R.T.M. (Class F)		4115.2	34085.8	1409.6	603.3
Eligible Freight R.T.M. @ 0.75		2314.8	16705.6	2123.0	1985.9
Eligible Mail R.T.M.	2178790.4	8949.5	73692.6	4953.3	23408.8
Total Weighted R.T.M.'s		15379.5	124484.0	8485.9	25998.0
Unit Cost Per R.T.M.		\$23.18	\$13.59	\$21.59	\$18.95
Percentage of Total Mail R.T.M.'s	100.000%	0.411%	3.382%	0.227%	1.074%
Unit Cost, Weighted by Mail R.T.M.'s percentage above	\$11.25735	\$0.09519	\$0.45959	\$0.04908	\$0.20361

<u>A. Circle</u>	<u>A. Circle</u>	<u>Bering</u>	<u>Bering</u>	<u>Bering</u>	<u>Bering</u>	<u>Bering</u>	<u>Bering</u>	<u>C. Smythe</u>
		\$1,619,106						\$1,014,566
		\$11,664,882						\$6,487,618
		\$4,746,293						\$3,044,484
		1.1095						1.1191
		264832						205313
		279318						218391
		1.0547						1.0637
Skyvan 486	Shorts 330 487	C-207 035	Navajo 194	B-1900 405	B-200 406	Casa 212 412	C-208 416	C-207 035
\$1,515,706	\$803,833	\$150,160	\$2,670,285	\$1,455,407	\$1,917,100	\$675,771	\$4,742,439	\$601,068
\$6,916	\$2,306	\$5,879	\$88,971	\$43,208	\$60,483	\$24,545	\$139,474	\$74,828
\$1,508,790	\$801,527	\$144,281	\$2,581,314	\$1,412,199	\$1,856,617	\$651,226	\$4,602,965	\$526,240
\$795.19	\$1,868.36	\$242.08	\$460.20	\$1,561.82	\$964.58	\$953.34	\$529.81	\$299.85
\$1,602,784	\$851,460	\$160,074	\$2,863,859	\$1,566,775	\$2,059,838	\$722,508	\$5,106,795	\$588,923
\$1,754,407	\$932,008	\$175,217	\$3,134,780	\$1,714,992	\$2,254,699	\$790,857	\$5,589,898	\$644,635
\$2,549,751	\$1,354,525	\$184,800	\$3,306,240	\$1,808,796	\$2,378,022	\$834,114	\$5,895,644	\$685,695
\$1,343.81	\$3,157.40	\$310.07	\$589.44	\$2,000.44	\$1,235.46	\$1,221.07	\$678.60	\$390.71
1897.4	429.0	596.0	5609.1	904.2	1924.8	683.1	8687.9	1755.0
9.5	0.0	213.4	4356.2	654.2	1078.2	277.4	7932.4	1087.3
\$12,766	\$0	\$66,168	\$2,567,728	\$1,308,686	\$1,332,078	\$338,725	\$5,382,959	\$424,818
39.4	0.0	1588.8	165803.8	51025.9	69511.7	55.8	323124.3	13193.1
347.6	0.0	356.4	12575.2	6932.5	5291.2	23513.5	34924.1	5305.4
423.2	0.0	2952.6	41603.8	29950.3	25836.4	10009.2	168965.3	9939.1
810.2	0.0	4897.8	219982.8	87908.7	100639.3	33578.5	527013.7	28437.6
\$15.76	\$0.00	\$13.51	\$11.67	\$14.89	\$13.24	\$10.09	\$10.21	\$14.94
0.019%	0.000%	0.136%	1.909%	1.375%	1.186%	0.459%	7.755%	0.456%
\$0.00306	\$0.00000	\$0.01831	\$0.22288	\$0.20464	\$0.15696	\$0.04634	\$0.79210	\$0.06815

<u>C. Smythe</u>	<u>C. Smythe</u>	<u>C. Smythe</u>	<u>C. Smythe</u>	<u>Frontier</u>	<u>Grant</u>	<u>Grant</u>	<u>Grant</u>	<u>Grant</u>
				\$1,298,589	\$2,000,743			
				\$16,051,358	\$10,012,191			
				\$6,456,048	\$3,655,478			
				1.0612	1.1715			
				642993	247663			
				727418	325524			
				1.1313	1.3144			
Navajo 194	Beech C-99 404	XXX 474/476	T-1040 478	Navajo 194	C-206 035	C-172 036	Navajo 194	Beech 200 406
\$2,197,224	\$1,759,531	\$542,081	\$1,387,714	\$2,210,835	\$3,058,463	\$424,271	\$2,578,230	\$1,507,401
\$129,705	\$100,239	\$30,474	\$63,957	\$103,383	\$255,964	\$28,440	\$213,304	\$42,660
\$2,067,519	\$1,659,292	\$511,607	\$1,323,757	\$2,107,452	\$2,802,499	\$395,831	\$2,364,926	\$1,464,741
\$499.91	\$743.88	\$679.52	\$571.89	\$383.12	\$292.98	\$241.89	\$459.34	\$774.71
\$2,313,791	\$1,856,939	\$572,547	\$1,481,436	\$2,236,489	\$3,283,095	\$463,711	\$2,770,483	\$1,715,927
\$2,532,676	\$2,032,605	\$626,710	\$1,621,580	\$2,448,060	\$3,593,676	\$507,579	\$3,032,571	\$1,878,254
\$2,693,995	\$2,162,072	\$666,628	\$1,724,867	\$2,769,492	\$4,723,465	\$667,152	\$3,985,959	\$2,468,744
\$651.38	\$969.28	\$885.41	\$745.18	\$503.48	\$493.80	\$407.70	\$774.20	\$1,305.73
4135.8	2230.6	752.9	2314.7	5500.7	9565.5	1636.4	5148.5	1890.7
3914.1	2069.6	410.6	2078.9	5338.1	8757.8	1356.6	5031.5	1868.7
\$2,549,583	\$2,006,018	\$363,551	\$1,549,153	\$2,687,626	\$4,324,621	\$553,079	\$3,895,378	\$2,440,018
104334.1	98425.4	14385.4	76897.4	136474.6	180867.8	12436.7	334045.4	257713.1
3534.4	15651.4	226.5	4956.3	17262.0	1445.7	72.9	1003.1	5041.0
68195.5	64845.3	12561.5	62849.5	107754.4	93660.7	4154.9	95000.0	55405.7
176064.0	178922.1	27173.4	144703.2	261491.0	275974.2	16664.5	430048.5	318159.8
\$14.48	\$11.21	\$13.38	\$10.71	\$10.28	\$15.67	\$33.19	\$9.06	\$7.67
3.130%	2.976%	0.577%	2.885%	4.946%	4.299%	0.191%	4.360%	2.543%
\$0.45325	\$0.33368	\$0.07713	\$0.30882	\$0.50831	\$0.67363	\$0.06329	\$0.39495	\$0.19502

<u>Grant</u>	<u>Grant</u>	<u>Hageland</u>	<u>Hageland</u>	<u>Hageland</u>	<u>Hageland</u>	<u>Hageland</u>	<u>Hageland</u>	<u>Iliamna</u>
		\$946,249						\$152,993
		\$20,371,822						\$1,901,832
		\$5,124,890						\$356,049
		1.0385						1.0727
		407467						7713
		448710						8125
		1.1012						1.0535
Beech 65 411	C-208 416	C-180 030	C-207 035	C-172 036	B-1900 405	C-208 416	C-406 417	C-207 035
\$840,660	\$1,603,166	\$73,997	\$4,669,852	\$132,649	\$4,122,938	\$7,993,838	\$3,392,368	\$354,674
\$42,660	\$95,989	\$14,685	\$397,843	\$14,685	\$198,729	\$402,109	\$139,737	\$51,249
\$798,000	\$1,507,177	\$59,312	\$4,272,009	\$117,964	\$3,924,209	\$7,591,729	\$3,252,631	\$303,425
\$752.62	\$789.97	\$229.89	\$236.26	\$113.14	\$1,089.85	\$626.31	\$946.00	\$195.46
\$934,848	\$1,765,640	\$61,598	\$4,436,665	\$122,511	\$4,075,460	\$7,884,337	\$3,377,997	\$325,479
\$1,023,284	\$1,932,670	\$67,425	\$4,856,374	\$134,100	\$4,460,998	\$8,630,195	\$3,697,556	\$356,270
\$1,344,987	\$2,540,268	\$74,250	\$5,347,921	\$147,673	\$4,912,527	\$9,503,718	\$4,071,811	\$375,318
\$1,268.50	\$1,331.45	\$287.79	\$295.77	\$141.64	\$1,364.33	\$784.04	\$1,184.25	\$241.77
1060.3	1907.9	258.0	18081.6	1042.6	3600.7	12121.4	3438.3	1552.4
1001.7	1712.7	84.6	13000.0	528.1	2341.5	10747.0	2698.4	426.0
\$1,270,653	\$2,280,370	\$24,347	\$3,844,957	\$74,800	\$3,194,568	\$8,426,127	\$3,195,584	\$102,980
80424.2	77063.8	953.2	260707.8	5468.3	276798.9	567757.5	201757.1	852.0
492.6	344.9	19.4	9538.4	178.9	18780.2	42491.7	6364.2	215.9
20457.3	56839.2	515.1	92943.1	928.2	64091.1	235693.1	54539.2	6593.2
101374.1	134247.9	1487.7	363189.3	6575.4	359670.2	845942.3	262660.5	7661.1
\$12.53	\$16.99	\$16.37	\$10.59	\$11.38	\$8.88	\$9.96	\$12.17	\$13.44
0.939%	2.609%	0.024%	4.266%	0.043%	2.942%	10.818%	2.503%	0.303%
\$0.11769	\$0.44313	\$0.00387	\$0.45161	\$0.00485	\$0.26127	\$1.07750	\$0.30454	\$0.04068

<u>Iliamna</u>	<u>Iliamna</u>	<u>Iliamna</u>	<u>Iliamna</u>	<u>Inland</u>	<u>Inland</u>	<u>Inland</u>	<u>Island</u>	<u>Island</u>	<u>L.A.B.</u>
				\$117,557			\$332,051		\$238,351
				\$1,387,322			\$1,208,360		\$1,536,517
				\$484,305			\$705,277		\$896,382
				1.0670			1.2099		1.1086
				30952			10048		24199
				36352			29176		26649
				1.1745			1.3000		1.1013
DHC-2 040	Beech 55 117	Navajo 194	Pilatus 479	C-207 035	Helio 034	C-172 036	PA-32 079	Islander 131/133	XXX System
\$85,268	\$110,732	\$115,357	\$1,107,797	\$1,011,800	\$121,023	\$254,499	\$309,243	\$700,951	\$1,418,547
\$19,820	\$13,685	\$24,633	\$43,317	\$71,631	\$8,003	\$18,730	\$18,524	\$48,335	\$69,106
\$65,448	\$97,047	\$90,724	\$1,064,480	\$940,169	\$113,020	\$235,769	\$290,719	\$652,616	\$1,349,441
\$291.27	\$296.96	\$382.00	\$653.62	\$273.77	\$362.24	\$157.99	\$248.52	\$297.59	\$149.25
\$70,205	\$104,101	\$97,318	\$1,141,851	\$1,003,179	\$120,595	\$251,570	\$351,755	\$789,631	\$1,496,004
\$76,846	\$113,949	\$106,525	\$1,249,870	\$1,098,079	\$132,003	\$275,369	\$385,031	\$864,331	\$1,637,527
\$80,955	\$120,041	\$112,220	\$1,316,695	\$1,289,655	\$155,033	\$323,411	\$500,540	\$1,123,630	\$1,803,362
\$360.28	\$367.32	\$472.50	\$808.48	\$375.54	\$496.90	\$216.72	\$427.89	\$512.37	\$199.46
224.7	326.8	237.5	1628.6	3434.1	312.0	1492.3	1169.8	2193.0	9041.2
60.4	2.3	49.2	1350.9	2049.8	0.0	296.8	1169.8	2193.0	8703.6
\$21,761	\$845	\$23,247	\$1,092,179	\$769,790	\$0	\$64,322	\$500,540	\$1,123,630	\$1,736,024
172.5	0.0	3102.0	154822.0	11220.5	0.0	901.3	17195.4	65426.0	99438.2
37.0	0.0	126.6	6355.1	2857.9	0.0	99.6	3712.4	8451.1	5240.7
1174.8	7.7	40.4	106.4	34387.1	0.0	1964.5	2755.4	6429.1	26649.3
1384.3	7.7	3269.0	161283.5	48465.5	0.0	2965.4	23663.2	80306.2	131328.2
\$15.72	\$109.72	\$7.11	\$6.77	\$15.88	\$0.00	\$21.69	\$21.15	\$13.99	\$13.22
0.054%	0.000%	0.002%	0.005%	1.578%	0.000%	0.090%	0.126%	0.295%	1.223%
\$0.00848	\$0.00039	\$0.00013	\$0.00033	\$0.25068	\$0.00000	\$0.01956	\$0.02675	\$0.04129	\$0.16168

<u>Peninsula</u>	<u>Peninsula</u>	<u>Peninsula</u>	<u>Peninsula</u>	<u>Servant</u>	<u>Smokey</u>	<u>Tanana</u>	<u>Tatonduk</u>	<u>Tatonduk</u>	<u>Tatonduk</u>
\$6,697,157				\$112,436	\$343,147	\$334,342	\$0		
\$35,416,811				\$349,859	\$617,534	\$389,201	\$20,794,187		
\$21,875,757				\$227,783	\$433,517	\$501,375	\$0		
1.1324				1.2417	1.4847	1.6011	1.1057		
506301				5513	2617	10726	33623		
507921				6348	2833	11817	38668		
1.0032				1.1515	1.0827	1.1017	1.1501		
PA-32 079	Navajo 194	C-208 416	T-1040 478	XXX System	C-206 035	XXX System	PA-32 079	Navajo 194	C-208 416
\$2,341,992	\$1,119,909	\$3,432,693	\$563,826	\$349,859	\$617,534	\$389,201	\$449,220	\$153,735	\$453,680
\$221,172	\$154,136	\$166,336	\$35,984	\$41,518	\$64,084	\$50,191	\$23,532	\$24,012	\$59,882
\$2,120,820	\$965,773	\$3,266,357	\$527,842	\$308,341	\$553,450	\$339,010	\$425,688	\$129,723	\$393,798
\$244.62	\$623.84	\$744.62	\$733.73	\$285.53	\$139.42	\$255.30	\$141.59	\$327.50	\$448.01
\$2,401,546	\$1,093,609	\$3,698,715	\$597,711	\$382,864	\$821,727	\$542,783	\$470,683	\$143,435	\$435,422
\$2,628,733	\$1,197,065	\$4,048,613	\$654,254	\$419,083	\$899,463	\$594,130	\$515,210	\$157,004	\$476,613
\$2,637,142	\$1,200,894	\$4,061,565	\$656,347	\$482,588	\$973,820	\$654,557	592517.535	180562.2	548129.7
\$304.17	\$775.72	\$925.90	\$912.35	\$446.88	\$245.31	\$492.93	\$197.09	\$455.85	\$623.58
8670.0	1548.1	4386.6	719.4	1079.9	3969.7	1327.9	3006.4	396.1	879.0
7436.5	1013.7	3956.4	623.7	992.2	3316.2	771.9	1983.5	278.8	589.0
\$2,261,950	\$786,349	\$3,663,242	\$569,035	\$443,387	\$813,507	\$380,490	\$390,919	\$127,091	\$367,291
89372.9	33546.6	163960.6	21994.9	13549.8	34138.0	7773.3	24883.5	7250.6	14465.4
8560.7	2545.4	25826.4	4180.5	669.3	4382.9	2852.5	4522.7	1560.1	8211.9
45202.5	10707.8	100634.7	18224.6	6348.1	2833.1	11816.5	15394.5	5587.5	17685.9
143136.1	46799.8	290421.7	44400.0	20567.2	41354.0	22442.3	44800.7	14398.2	40363.2
\$15.80	\$16.80	\$12.61	\$12.82	\$21.56	\$19.67	\$16.95	\$8.73	\$8.83	\$9.10
2.075%	0.491%	4.619%	0.836%	0.291%	0.130%	0.542%	0.707%	0.256%	0.812%
\$0.32785	\$0.08258	\$0.58260	\$0.10720	\$0.06281	\$0.02558	\$0.09195	\$0.06165	\$0.02264	\$0.07386

<u>Warbelow's</u>	<u>Warbelow's</u>	<u>Wings</u>	<u>Wings</u>	<u>Wright</u>	<u>Wright</u>	<u>Wright</u>	<u>Wright</u>	<u>Wright</u>
\$525,013		\$529,936		\$915,731				
\$5,759,712		\$2,441,719		\$4,466,323				
\$1,766,022		\$1,730,240		\$1,620,462				
1.0750		1.1455		1.1771				
190174		27407		105470				
203422		28755		115219				
1.0697		1.0492		1.0924				
<u>C-207</u>	<u>Navajo</u>	<u>C-207</u>	<u>C-208</u>	<u>Beech 35</u>	<u>Helio</u>	<u>C-207</u>	<u>Navajo</u>	<u>C-208</u>
035	194	035	416	010	034	035	194	416
\$228,299	\$5,531,411	\$572,067	\$955,966	\$41,995	\$345,340	\$330,939	\$778,773	\$2,969,276
\$35,540	\$165,460	\$30,460	\$42,030	\$3,359	\$17,685	\$32,048	\$68,918	\$158,534
\$192,759	\$5,365,951	\$541,607	\$913,936	\$38,636	\$327,655	\$298,891	\$709,855	\$2,810,742
\$133.07	\$329.98	\$226.96	\$488.27	\$343.43	\$267.06	\$260.00	\$329.41	\$372.79
\$207,215	\$5,768,366	\$620,414	\$1,046,919	\$45,478	\$385,679	\$351,821	\$835,562	\$3,308,490
\$226,817	\$6,314,053	\$679,105	\$1,145,958	\$49,780	\$422,164	\$385,103	\$914,606	\$3,621,474
\$242,618	\$6,753,894	\$712,505	\$1,202,319	\$54,382	\$461,187	\$420,700	\$999,147	\$3,956,224
\$167.48	\$415.34	\$298.57	\$642.33	\$483.39	\$375.90	\$365.95	\$463.66	\$524.71
1448.6	16261.2	2386.4	1871.8	112.5	1226.9	1149.6	2154.9	7539.8
1360.5	15989.6	2297.2	1715.8	9.4	6.7	25.3	877.1	6051.2
\$227,862	\$6,641,088	\$685,873	\$1,102,115	\$4,544	\$2,519	\$9,259	\$406,679	\$3,175,138
14375.7	654341.8	49658.9	91202.6	42.6	121.0	222.7	34843.7	333291.5
2577.1	53655.1	5553.2	8910.0	53.5	0.0	88.8	2928.9	46433.0
7336.7	196085.4	6842.8	16282.2	77.0	0.0	42.4	10474.4	104625.4
24289.5	904082.3	62054.9	116394.8	173.1	121.0	353.9	48247.0	484349.9
\$9.38	\$7.35	\$11.05	\$9.47	\$26.25	\$20.81	\$26.16	\$8.43	\$6.56
0.337%	9.000%	0.314%	0.747%	0.004%	0.000%	0.002%	0.481%	4.802%
\$0.03159	\$0.66109	\$0.03471	\$0.07076	\$0.00093	\$0.00000	\$0.00051	\$0.04052	\$0.31479

Appendix B
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Yute

\$246,636
\$865,784
\$716,606
1.1846
29069
31363
1.0789

XXX
35/94/412

\$852,577
\$23,624
\$828,953
\$201.87

\$982,012
\$1,074,911
\$1,159,746
\$282.43

4106.3
3859.9
\$1,090,155

97150.0
862.8
31363.1
129375.9
\$8.43

1.439%
\$0.12129

**PART 135 SEAPLANE LINEHAUL RATES
YE MARCH 31, 2005**

<u>System Parameters for Each Carrier</u>		<u>TOTALS</u>	<u>A.Seaplane</u>	<u>Iliamna</u>	<u>Island</u>	<u>Peninsula</u>	<u>Promech</u>
1.	Capacity Related Expense (CR), Skd F-2		\$101,354	\$152,993	\$332,051	\$6,697,157	\$573,778
2.	Direct Expense including fuel, Skd F-2		\$588,202	\$1,901,832	\$1,208,360	\$35,416,811	\$3,854,274
3.	Indirect Expense including CR, Skd F-2		\$308,955	\$356,049	\$705,277	\$21,875,757	\$2,695,140
4.	Capacity Related Markup		1.1274	1.0727	1.2099	1.1324	1.0960
5.	T-100 Scheduled (F) Mail RTM's, Market		4751.0855	7713	10048	506301	11300
6.	T-100 Scheduled (F) Mail RTM's, Segment		5100.635	8125	29176	507921	12026
7.	Circuitry Markup		1.0736	1.0535	2.9038	1.0032	1.0643
<u>Carrier</u>			A.				
<u>Aircraft Code</u>			Seaplane	Iliamna	Island	Peninsula	Promech
			030/040	040	035	170	033
8.	<u>Total Direct Expense</u>		\$588,202	\$128,004	\$198,166	\$887,925	\$132,487
9.	Passenger Liability Insurance		\$2,924	\$15,864	\$13,251	\$83,168	\$11,721
10.	Allocable to Mail (Total minus Pax Liab. Ins.)		\$585,278	\$112,140	\$184,915	\$804,757	\$120,766
11.	Unit Costs per Block Hour		\$282.24	\$251.32	\$308.50	\$1,169.53	\$343.57
<u>Markups per Carrier system Parameters</u>							
12.	Linehaul + Capacity Related Markup		\$659,819	\$120,291	\$223,738	\$911,280	\$132,362
13.	Line 12 plus markup for Return and Tax		\$722,238	\$131,670	\$244,903	\$997,487	\$144,883
14.	Line 13 plus markup for Circuitry		\$775,375	\$138,710	\$711,147	\$1,000,679	\$154,194
15.	Unit Costs per Block Hour		\$373.91	\$310.87	\$1,186.43	\$1,454.26	\$438.67
16.	System Revenue Block Hours		2073.7	446.2	599.4	688.1	351.5
17.	Eligible Block Hours (Class F)		1414.0	27.0	599.4	567.8	111.1
18.	Eligible Linehaul Expense		\$528,707	\$8,393	\$711,147	\$825,731	\$48,737
	Eligible Pax R.T.M. (Class F)		17816.1	104.4	4552.8	16143.5	1221.4
	Eligible Freight R.T.M. @ 0.75 (Class F)		3051.5	28.0	1258.8	1408.0	42.7
	Eligible Mail R.T.M. (Class F)	58644.0	5100.6	202.5	1622.4	3651.7	102.0
	Total Weighted R.T.M.'s	232624.8	25968.2	334.9	7434.0	21203.2	1366.1
	Unit Cost Per R.T.M.		\$20.36	\$25.06	\$95.66	\$38.94	\$35.68
	Percentage of Total Mail R.T.M.'s		8.69756%	0.34530%	2.76654%	6.22689%	0.17393%
	Unit Cost, Weighted by Mail R.T.M.'s percentage above	\$24.19596	\$1.77081	\$0.08654	\$2.64651	\$2.42498	\$0.06205

<u>Taquan</u>	<u>Wings</u>
\$208,330	\$529,936
\$2,038,416	\$2,441,719
\$824,808	\$1,730,240
1.0785	1.1455
31101	27407
33779.195	28754.869
1.0861	1.0492

Promech 040	Promech 042	Taquan 040	Wings 040	Wings 042	Wings 035
\$1,594,268	\$2,127,518	\$2,038,416	\$570,545	\$218,903	\$124,238
\$95,248	\$117,900	\$89,532	\$26,558	\$13,165	\$6,722
\$1,499,020	\$2,009,618	\$1,948,884	\$543,987	\$205,738	\$117,516
\$307.88	\$438.89	\$379.91	\$526.76	\$452.57	\$325.71
\$1,642,955	\$2,202,581	\$2,101,813	\$623,140	\$235,674	\$134,615
\$1,798,379	\$2,410,945	\$2,300,645	\$682,089	\$257,969	\$147,350
\$1,913,950	\$2,565,882	\$2,498,773	\$715,636	\$270,656	\$154,597
\$393.11	\$560.37	\$487.10	\$692.98	\$595.37	\$428.48
4868.8	4578.9	5129.9	1032.7	454.6	360.8
2179.3	1650.8	2185.8	5.7	450.6	304.2
\$856,694	\$925,060	\$1,064,703	\$3,950	\$268,275	\$130,345
38942.6	52415.0	11885.2	135.0	11923.0	4337.6
2529.2	3327.2	1063.4	6.8	1247.8	540.8
5010.5	6913.5	33779.2	9.1	1550.8	701.7
46482.3	62655.7	46727.8	150.9	14721.6	5580.1
\$18.43	\$14.76	\$22.79	\$26.18	\$18.22	\$23.36
8.54392%	11.78893%	57.60043%	0.01552%	2.64443%	1.19654%
\$1.57469	\$1.74054	\$13.12438	\$0.00406	\$0.48190	\$0.27950

**BUSH CARRIER TERMINAL CHARGE CALCULATIONS
YE MARCH 31, 2005**

Appendix D
Page 1 of 2

<u>Carrier</u>	<u>Carrier ID</u>	<u>Capacity</u>	<u>Wtd Dep. (Capacity/2000)</u>	<u>Dep Rel Exp YE 3-05</u>
2E	6971	15483000	7741.5	\$20,703
2F	6987	79446159	39723.0795	\$4,199,077
4E	6969	2053915	1026.9575	\$113,651
4W	6967	29043096	14521.548	\$698,106
4Y	6964	9585883	4792.9415	\$439,392
5F	6996	33169694	16584.847	\$1,115,423
6C	6990	34794670	17397.335	\$1,269,363
7H	6989	62172409	31086.2045	\$3,870,938
7N	6982	5339989	2669.9945	\$280,451
8D	6973	1995920	997.96	\$104,882
8E	6992	69995697	34997.8485	\$1,643,020
8V	6965	23296484	11648.242	\$492,896
9I	6981	13531561	6765.7805	\$300,844
G9	6985	57429735	28714.8675	\$1,392,990
H6	6984	146426961	73213.4805	\$2,514,672
J5	6997	2269350	1134.675	\$151,177
JF	6979	13415237	6707.6185	\$386,981
K3	6968	5217687	2608.8435	\$336,905
K5	6966	24175693	12087.8465	\$933,179
PNA	6975	136750282	68375.141	\$8,031,211
V8	6983	7441750	3720.875	\$133,364
Z3	6974	16300658	8150.329	\$1,535,127
<u>TOTAL</u>			<u>394667.915</u>	<u>\$29,964,352</u>

Terminal Charge Calculation

Cost per Wtd. Dep, YE 6-30-03	\$60.84	
Cost per Wtd. Dep, YE 3-31-05	\$83.18	
Index Factor	1.36719	
Terminal Charge - Order 2005-1-18	\$695.25	per ton enplaned
Terminal Charge - YE 3-31-05	\$950.54	per ton enplaned

<u>Carrier</u>	<u>\$/Wtd Dep</u>	<u>CR Markup</u>	<u>Dep Rel + CR Markup</u>	<u>Index Cost/Wtd Dep</u>
<u>2E</u>	\$2.67	1.4847	\$30,738	\$3.97
<u>2F</u>	\$105.71	1.0612	\$4,456,061	\$112.18
<u>4E</u>	\$110.67	1.6011	\$181,967	\$177.19
<u>4W</u>	\$48.07	1.075	\$750,464	\$51.68
<u>4Y</u>	\$91.67	1.1846	\$520,504	\$108.60
<u>5F</u>	\$67.26	1.0623	\$1,184,914	\$71.45
<u>6C</u>	\$72.96	1.1191	\$1,420,544	\$81.65
<u>7H</u>	\$124.52	1	\$3,870,938	\$124.52
<u>7N</u>	\$105.04	1.067	\$299,241	\$112.08
<u>8D</u>	\$105.10	1.2417	\$130,232	\$130.50
<u>8E</u>	\$46.95	1.1095	\$1,822,931	\$52.09
<u>8V</u>	\$42.32	1.1771	\$580,188	\$49.81
<u>9I</u>	\$44.47	1.2099	\$363,991	\$53.80
<u>G9</u>	\$48.51	1.1715	\$1,631,888	\$56.83
<u>H6</u>	\$34.35	1.0385	\$2,611,487	\$35.67
<u>J5</u>	\$133.23	1.2736	\$192,539	\$169.69
<u>JF</u>	\$57.69	1.1086	\$429,007	\$63.96
<u>K3</u>	\$129.14	1.0785	\$363,352	\$139.28
<u>K5</u>	\$77.20	1.1455	\$1,068,957	\$88.43
<u>PNA</u>	\$117.46	1.1324	\$9,094,543	\$133.01
<u>V8</u>	\$35.84	1.0727	\$143,060	\$38.45
<u>Z3</u>	\$188.35	1.096	\$1,682,499	\$206.43
<u>TOTAL</u>			<u>\$32,830,043</u>	<u>\$83.18</u>