

Supporting Postal Services through Location-Based Fees

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Background

- I had proposed method for adjusting price with falling volumes
 - PC 2016
 - For PRC “Public Representative”, PAEA 10th (my opinions only here)
- PRC proposed adjustment based on falling “density”, volumes per “location”
- Implied cost coverage through location fees \approx \$100/year/location
- Compute; explore implications

Recap

- **Brennan-Crew adjustment formula**

- $\frac{\Delta P}{P} = -\frac{\Delta q}{q} \frac{F}{C+Fe_D}$

- Elasticity of average cost e_{AC} , for scale

- Elasticity of demand e_D , for feedback

- With constant MC, F = fixed cost, C = total cost

- **US PRC decision**

- $\frac{\Delta P}{P} = -\frac{\Delta d}{d} \frac{F}{C}$

- "d" = volume/locations, aka "delivery points"

- (Ignore not adjusting for feedback)

Implication for fees

- PRC formula implies no change in average cost if “density” constant
- If C = cost, Q = volume, N = location
- $\Rightarrow C(Q, N) = QC_Q + NC_N$,
- If marginal costs of volume, location constant as M , V respectively,
- $C(Q, N) = MQ + VN$
- Recover all costs with marginal cost prices and location fee

What is V ?

- Since locations get all kinds of mail, compute for market-dominant) services
 - Lower postages for each service = its MC
- V = “Institutional cost”/“delivery points”
- 2020 Institutional cost = \$16.6B
 - \$14.8B from services that contributed + \$1.8B from those that were short
- 2020 delivery points = 161.4 million
- $\Rightarrow V = \$102.85/\text{year} = \$8.57/\text{month}$

So what's the problem?

#1 : Numerator

- Dividing USPS fixed costs between market-dominant, competitive services
 - Institutional cost recovery result of pricing
 - BC perspective only maintaining solvency
- Location fee invites cross-subsidization complaints
- Responses
 - Set USPS competitive prices as market would (Brennan, 2020)
 - Price-cap fees without regard to "cost"

So what's the problem?

#2 : Denominator

- What's a "delivery point"?
 - USPS: "A single mailbox or other place to which mail is delivered. A street address does not necessarily represent a single delivery point because a street address such as one for an apartment building may have several delivery points."
- Some delivery costs vary
 - Apartments, cluster boxes, urban home delivery, rural
 - Corporate, government, etc. "mail room"
- USPS claims mix doesn't change, only population
- Sorting costs same regardless of delivery point?

Implementation resistance #1: Equal fee per delivery point

- Those using cluster boxes, in apartments resent paying same fee as those with home delivery, rural customers?
- But we already have average cost pricing
- Similar urban/rural divide?

Implementation resistance #2: Equal fee regardless of volume?

- Current system: Those who get more mail (implicitly) pay more
- “Why should I pay the same fee? I hardly get mail!”
- Prior controversy: Telephones
 - Highly inefficient subsidy of fixed lines with long-distance surcharges
- Regulatory pricing “original sin”
 - Electricity, water

Implementation resistance #3: Dropping off the grid?

- What if some people decide mail isn't worth \$100/year?
 - Bills, personal correspondence, catalogs come on-line
 - Kramer on *Seinfeld*: <https://youtu.be/On3cQ0sPvSY>
- USPS formula assumed everyone got mail
 - Implied "marginal cost" really average cost
- Network externalities, low MC => fee mandatory
 - Opposition to mandatory fee in principle
 - Reinforces cross-subsidy concern

Implementation issue #4: Price caps for delivery fees?

- MC cost recovery does not necessarily imply return to cost-of-service regulation
- Apply price-caps to location fees, as well so to (50% lower) market-dominant service postage
- Gives USPS incentive to reduce delivery-point costs
- Use expected efficiency to reduce fee

Concluding observations

- PRC approach implies efficient cost recovery through \$100/year delivery point fee
 - Less than Amazon Prime, but no video!
- Numerator, denominator problematic
- Implementation resistance predictable
- Is the PRC's density approach credible?