



David Campbell

**Minister for Transport
Minister for the Illawarra**



Dr Michael Keating, Chair
Independent Pricing and Regulatory Tribunal
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Dear Dr Keating

Please find attached the NSW Government's submission to IPART in response to its draft CityRail fare determination for 2009 – 2012 and the draft report *Improving CityRail's Accountability and Incentives through Stronger Governance Arrangements*.

The Government understands that fare increases are required to cover the costs of services. However, the Government submits that the draft fare determination places too great a burden on longer-distance commuters, which includes those who travel to the C.B.D. from the outer suburbs of Sydney, the Central Coast, Wollongong and Newcastle.

In accepting IPART's recommendation that rail users should contribute 30% of the overall cost of services, the Government requests that the fare increases be more evenly distributed, and that greater weight be given to equity considerations and the Government's overall objectives for public transport.

An alternative fare schedule is proposed that achieves the required contribution from commuters within a more acceptable framework to Government. I urge IPART give due consideration to the Government's proposal and to feedback from the community.

The Government looks forward to an ongoing discussion with IPART and the community on these issues and to receiving IPART's final recommendations in December.

The Government also intends to provide subsequent information to IPART on its proposed service efficiencies following the November mini budget.

Yours sincerely

**David Campbell
Minister for Transport
Member for the Illawarra**



IMPROVING CITYRAIL'S ACCOUNTABILITY AND INCENTIVES

**REVIEW OF CITYRAIL FARES, 2009-
2012**

**SUBMISSION BY NEW SOUTH WALES
GOVERNMENT TO:**

**INDEPENDENT PRICING AND
REGULATORY TRIBUNAL OF
NEW SOUTH WALES**

November 2008

Submission to:

Independent Pricing and Regulatory Tribunal's Draft Reports:

Improving CityRail's accountability and incentives Review of CityRail fares, 2009-2012

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1. EXECUTIVE SUMMARY

This Submission provides the Government's response to IPART's Draft Reports: *Improving CityRail's accountability and incentives* and *Review of CityRail fares, 2009-2012*.

The Government's response is summarised below:

Governance

- (i) The Government acknowledges IPART's comments relating to the need to improve the governance structure for CityRail and to improve the efficiency of operations.
- (ii) The Government has recently introduced legislation to Parliament to restructure RailCorp's governance arrangements and provide a framework for a service contract between RailCorp and the Ministry of Transport.
- (iii) This reform will allow Government to move towards a governance arrangement along the lines of the purchaser-provider model proposed by IPART and assist with the achievement of appropriate efficiency savings.

Fares

- (iv) The Government agrees with IPART's proposal for a simpler, more transparent and consistent CityRail fare structure, based on a flag fall and distance charge.
- (v) The Government further agrees with the use of a multi-year determination period.
- (vi) For the purpose of this determination, Government considers that the overall quantum of additional revenue that would be generated by the application of the proposed fare structure is an appropriate target.
- (vii) Moreover, for the purpose of this determination period, Government agrees that the ratio of costs apportioned to the taxpayer (70%) and commuter (30%), recommended by IPART, is an appropriate target.
- (viii) The Government recognises that IPART has sought to develop a cost-reflective fare structure in keeping with its Terms of Reference and the Government agrees that rail fares should be as cost reflective as possible.
- (ix) However, this process has provided Government with the opportunity to examine, in detail, the impacts and the Government is particularly concerned about the impact of the proposed changes on certain groups

such as regular passengers who use the network frequently over longer distances. The Government's policy perspective is that fare increases should be moderated to better reflect affordability and the Government's wider policy agenda for transport.

- (x) The Government, therefore, believes that the levels of fares should balance factors outside direct costs, including capacity to pay; availability of alternative transport options; the economic benefits to regional areas afforded by access to employment in the CBD; and the social cost of extended commuting times.
- (xi) The Government also believes that the actual dollar value of the fare increase must be considered – not just the percentage increase – as the latter alone does not properly capture the financial impact on the individual passenger.
- (xii) For these reasons, the Government requests that IPART consider an alternative framework that is consistent with IPART's recommendations on CityRail's revenue requirement and the proportion of revenue to be funded by passenger fares, but which ensures a fairer outcome having regard to social considerations as well as Government's policy objectives for public transport.
- (xiii) This would involve a somewhat higher flag-fall and an alternative rate per kilometre that declines with distance travelled.
- (xiv) The Government does not support the proposed increase to the off-peak discount at this time. The recent trial of a 50% off-peak fare provides no indication that this initiative, alone, succeeds in substantially shifting commuters out of peak periods and which is understood to be a similar result from the Victorian Government's free rail travel prior to 7:00am. The Government prefers to retain the option to increase the off-peak discount at a later date, should complimentary initiatives be devised that makes this option more attractive to commuters.
- (xv) The Government believes that there would be benefits in having further discussions with IPART about aspects of the proposed fare-setting methodology as the longer term basis for setting rail fares beyond the immediate determination.

2. GOVERNANCE OF RAILCORP

Together with its draft determination on CityRail fares 2009-2012, IPART released a draft report entitled *Improving CityRail's accountability and incentives through stronger governance arrangements*. That report made specific recommendations for changes to RailCorp's Statement of Corporate Intent, Rail Performance Agreement and funding agreement. IPART identified that the purpose of these recommendations was to build clearer frameworks that better specified performance standards and would allow Government to set and monitor CityRail's strategic direction and performance.

Since that report was released, the Government has introduced legislation to Parliament to change RailCorp's governance arrangements. This legislation includes provisions that will require the terms and conditions on which rail services are provided by RailCorp to be set out in a service contract between RailCorp and the Director General of the Ministry of Transport.

Once in place, the contract will effectively replace the Statement of Corporate Intent, the Rail Performance Agreement and the funding agreement, thus allowing the Government to move towards a governance arrangement for delivery of Cityrail services along the lines of the purchaser-provider model proposed by IPART.

The legislation will allow for establishment of a service contract that will clearly stipulate what is expected of RailCorp in terms of service, performance standards, service alterations, community consultation, regular service reviews and the handling of complaints.

The intent behind the changes to RailCorp's governance arrangements is consistent with those underpinning IPART's recommendations for improvements to the existing framework. IPART's recommendations will, therefore, form a central reference for developing the service contract between the Ministry of Transport and RailCorp, as will its recommendations for improving transparency and public reporting.

3. THE GOVERNMENT'S COMMENTS ON THE FARE STRUCTURE

The Government agrees with IPART'S recommendations for a simpler, more transparent and more consistent CityRail fare structure, based on a flag fall and distance charge. The Government also agrees with IPART's proposed revenue target, which reflects the efficient cost of the provision of CityRail's services and the application of a 70/30 split between the contributions made by taxpayers and passenger fares.

However, the Government believes that, in accordance with its broader policy objectives, there is a strong case for a fare structure which gives due consideration to social impacts, in particular the affordability of the fare increases on certain sectors of the community.

As such, the Government requests that IPART consider an alternative approach that better addresses these affordability impacts, while still delivering a more cost-reflective and consistent regulatory framework, the required revenue over the determination period and a 30% contribution from passengers to overall costs.

To do this, it is proposed that the impacts of fare increases to passengers in dollar terms as well as overall percentage increases, be taken into account to ensure that the impact on individual passengers is given full weight.

Further, the suggested approach gives some consideration to factors affecting public transport use, especially considering that many people travelling longer distances on trains do so because it is the only transport option other than private vehicle over this distance.

The train network provides significant economic benefit as people can access to a wider range of jobs. The availability of local jobs may be limited so people have to travel long distances. This can have a significant social impact. Time away from families is already a disadvantage faced by long-distance commuters, and it is the Government's strong view that such commuters should not be unjustly penalised for frequently having to work or study away from home.

In light of the above considerations, to

- achieve the revenue increases identified as appropriate by IPART; but
- mitigate impacts on those people travelling longer distances, particularly on a regular basis;

it is proposed that IPART consider introducing a somewhat higher flagfall (of \$3.25 in 2009 and staying constant in real terms) and a lower distance charge (of 6 cents per km) that also declines, by 5% per 5km band, with distance travelled (rather than being fixed).

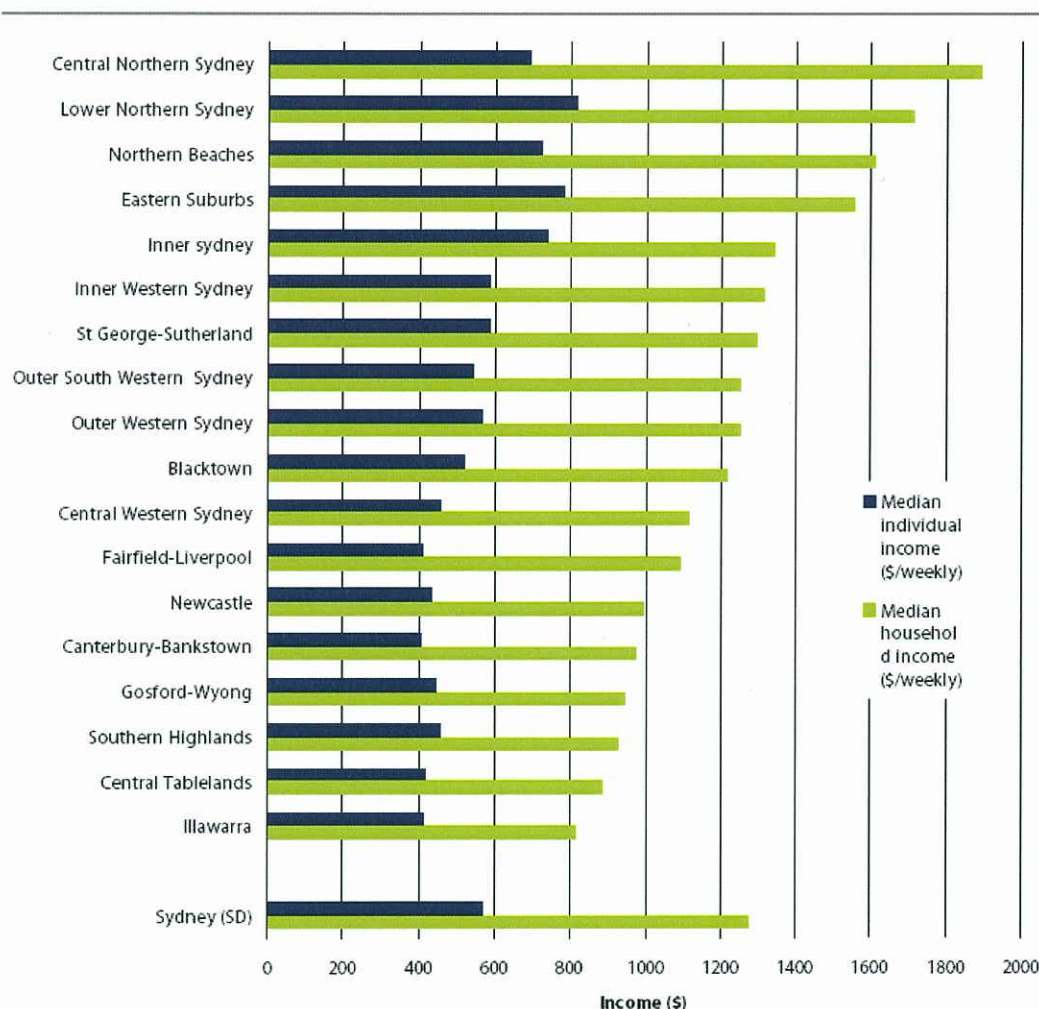
The Government also proposes that the off-peak fare discounts be maintained at the current level of 30% with the current business rules for use continuing to apply.

Relevant factors in support of this proposal are discussed further below.

3.1. Affordability impact of fare increases

The IPART report provides the following breakdown of household income by region:

Figure 15.5 Median Incomes within the Sydney Greater Metropolitan Area 2006 (real \$2008/09)



Under the current fare proposal, 10 of the 11 regions with the lowest individual and median household incomes will be hit with weekly fare increases of up to \$36.00, based on travel to the city.

For example, a regular commuter travelling between Fairfield and Town Hall (35kms) would pay an \$8 increase in Year 1; a \$3 increase in Years 2 and 3; and a \$2 increase in Year 4 (totalling \$16 over 4 years). Similarly, a commuter travelling between the city and Campbelltown (55kms) would be facing a \$19 increase over the determination period: \$8 in Year 1; \$3 in Year 2; and \$4 in Years 3 and 4.

In comparison, a passenger travelling from Bondi Junction to the City (in the 10km distance band) would only face a \$6 increase in their weekly RailPass over the determination period (\$3 in Year 1, no change in Year 2; and \$1 in Years 3 and 4). Similarly, a commuter travelling on a rail weekly from Chatswood (in the 15km distance band) would only face a \$7 increase over four years (\$2 in Years 1 to 3; and \$1 in Year 4).

The Government strongly believes that CityRail's fare increases should be mitigated for longer-distance passengers and, in particular, those who are regular commuters because:

- (i) Patronage data indicates that passengers travelling shorter distances (20km or less) tend to live in the inner suburbs of Greater Sydney, and therefore are generally on higher median incomes and have a variety of transport options available to them;
- (ii) CityRail's main transport task remains the regular commuter market and therefore emphasis must be placed on ensuring fares remain as affordable for all passengers.

This is consistent with the Government's broader transport policy objectives as set out in the State Plan which focuses on increasing public transport's share of journeys to work in Greater Sydney.

Fare levels should take into account this broader policy agenda by requiring regular commuters, and particularly longer-distance commuters, to bear a relatively fairer share of the fare increases.

IPART correctly notes that distance travelled is not always an accurate reflection of capacity to pay, with some areas being located closer to the CBD but having lower median incomes than some areas located further away.¹ Moreover, passenger journeys are also taken elsewhere on the CityRail network, making it difficult to ascertain precisely capacity to pay in all circumstances.

Nevertheless, the Government is of the opinion that the correlation between median incomes and distance from the CBD is sufficiently strong as to not be dismissed entirely.

3.2. Fare outcomes under the Government's proposal

Under the Government's proposal, increases to single and weekly tickets for medium to long distance passengers (25km and upwards) would be significantly reduced compared to the draft determination over the four-year period, whilst fares for shorter distances (up to 15 km) would increase slightly more in dollar terms. There would be no change for passengers travelling between 15 and 20kms.

Details of the proposed fare changes are set out in Schedules 1 and 2.

¹ IPART Draft determination p139.

While the Government's forecast increases to short distance fares are larger in percentage terms, they are, in actual dollar terms relatively modest, particularly when compared to the dollar increases recommended for some individual fares in the draft determination.

Under this approach, no individual single fare will increase by more than \$1.40 over the four year determination period in nominal terms (that is, adjusted for the impacts of inflation at an assumed rate of 3.7%).

Further, passengers eligible for a half fare concession will still only be charged half the increase on the equivalent adult ticket.

3.3. Flag fall and distance based charge

The Government acknowledges that IPART's calculation of flag fall and distance charged is based on an estimate of fixed and variable costs. There is a degree of uncertainty over this estimate, with a range of values able to be arrived at, depending on the methodology used.

While the Government has a strong policy position supporting a different flag fall and distance based charge on policy grounds, there is some room to move economically to support this policy position.

For instance, it is noted that the Government provides relatively fixed funding to CityRail to provide a certain level of service as expressed through the CityRail timetable. The costs of providing those services are fixed so long as the timetable and service specifications remain unchanged. Arguably, these should be captured in the calculation of the flag fall charge.

In addition, it is argued that there is inherent value to all CityRail users of having access to the wider rail network, the value of which should also be reflected as standard in the flag-fall charge.

A declining distance charge for each service kilometre is justified on the basis of the wider considerations the Government has outlined above, namely the social impacts on longer distance regular commuters and the Government's broader policy objectives for public transport.

3.4. Transitioning towards a constant frequency discount for weekly tickets

The Government agrees in principle that frequency discounts for weekly tickets should be transitioned towards a benchmark 20% on the equivalent 10 single tickets. This will better position weekly tickets for the introduction of fares for the new electronic ticketing system while also mitigating the impact of price increases.

The Government's fare proposal provides a price path which transitions weekly tickets towards the benchmark 20% discount at an accelerated rate compared to the draft determination.

3.5. Current non distance based products to be retained

The Government accepts IPART's approach which seeks to better align the frequency discounts on Traveypass products with those on weekly tickets. The Government also accepts IPART's approach regarding the DayTripper, CityHopper and SydneyPass products.

3.6. Off-Peak Return Ticket

The Government does not support an increase in the off-peak discount from 30% to 50% at this time. RailCorp has undertaken a trial to this effect over the previous 3 months to test whether a larger off-peak discount would attract commuters away from peak services. On its own, however, the discounted ticket has been unable to deliver a substantial shift in patronage.

The Government accepts that fare pricing has a role to play in managing CityRail's customer demand, but results of this trial suggest that the proposed 50% off-peak return ticket by itself will not produce the desired outcome. RailCorp customers have indicated that other measures such as weekly off-peak tickets would be greater inducements, and further work must be done in the longer term with businesses to promote more flexible working hours.

This accords with what it is understood has been the experience in relation to the Victorian Government's offering of free rail travel before 7:00am to better manage demand in the commuter peaks.

The Government will reserve the option of greater off-peak discounts in the longer term as part of any consideration as to a more holistic package aimed at freeing up capacity on peak rail services.

For these reasons, the Government recommends there be no change at the present time to the current discount and travel conditions of the off-peak return ticket.

4. COMMENTS ON CITYRAIL'S REVENUE REQUIREMENT

4.1. Valuing the cost base

The Government supports the building block approach in so far as it informs the decision on CityRail's revenue requirement. It is a framework which allows consistent and transparent setting of future revenue requirements and its use can help promote efficiency and service improvement through transparently examining each of CityRail's major cost drivers.

The Government is mindful, however, that using a building block approach means that the model can be sensitive to changes in costs over the longer term. For example, investment in new assets, the delivery of savings, or swings in patronage. This sensitivity can potentially mean that future fare determinations could swing markedly in line with short run cost movements.

Although the Government accepts the cost base derived by IPART for the present four year price path, including the proposed 70/30 revenue split between taxpayers and passengers, the Government would like to discuss with IPART which smooths out the effects of short run swings in costs and revenues for future determination periods.

The Government also proposes that the framework for determining CityRail's revenue requirement should be sufficiently flexible to take into account not only the results of the building block approach, but also considerations of wider external benefits, social impact/affordability, economic conditions, transport policy and savings deliverability as determined by Government.

4.2. Efficient operating and maintenance expenditure

The Government is committed to improving CityRail services and driving efficiency. The government-run maintenance depots have been directed to attain private sector standards or face having these services outsourced. An independent assessor will benchmark CityRail's performance in this regard.

The Government is currently considering the scope for further efficiencies in CityRail's operating costs. A central factor in these considerations is the impact on customer service and the options to address those impacts, in the event reforms are considered appropriate.

Government intends to respond separately to IPART's recommendations for service efficiency savings, which are being considered as part of the mini-budget process. Further advice on the Government's position on the savings proposed in the draft determination will be provided to IPART at this time.

4.3. Allowance for a Return on Capital

The Government agrees with the inclusion of a return on capital component in determining CityRail's revenue requirement, but this must be based on an asset base valuation that is defensible and realistic.

4.4. Forecast patronage growth

The Government would like to note that patronage projections are always highly uncertain. However, the 2008/09 forecast of 5% and 2.5% per annum thereafter are consistent with the trajectory needed to meet State Plan targets.²

The Government notes a fare-setting approach should take into account the economic climate as well as Government transport policy objectives. The Government broadly supports the approach proposed by IPART for its current determination – although with the changes proposed in this submission – and would like continuing dialogue in respect of the approach to future determinations.

² (i) To increase the share of commuter trips made by public transport to and from the Sydney CBD during peak hours to 75% by 2016; (ii) to increase the proportion of total journeys to work by public transport in the Sydney metropolitan region to 25%

SCHEDULE 1 – Proposed 2009 Fares

Comparison between the Government and IPART's draft proposal (Nominal)

Distance Band (km)	Adult Single		Adult Weekly	
	Government	IPART	Government	IPART
5	\$3.00	\$3.00	\$24.00	\$24.00
10	\$3.40	\$3.40	\$27.00	\$27.00
15	\$4.00	\$3.80	\$32.00	\$30.00
20	\$4.20	\$4.20	\$34.00	\$34.00
25	\$4.60	\$4.60	\$37.00	\$37.00
30	\$4.60	\$5.20	\$37.00	\$42.00
35	\$4.80	\$5.60	\$38.00	\$45.00
45	\$5.60	\$6.40	\$42.00	\$48.00
55	\$6.80	\$7.40	\$46.00	\$52.00
65	\$7.40	\$8.20	\$50.00	\$56.00
75	\$8.80	\$9.00	\$53.00	\$59.00
85	\$9.80	\$10.00	\$57.00	\$63.00
95	\$10.80	\$10.80	\$60.00	\$64.00
105	\$11.20	\$11.80	\$62.00	\$66.00
115	\$12.40	\$12.60	\$65.00	\$69.00
125	\$13.80	\$13.60	\$69.00	\$72.00
135	\$14.00	\$14.40	\$74.00	\$76.00
155	\$16.00	\$16.00	\$81.00	\$83.00
175	\$18.20	\$18.00	\$84.00	\$88.00
195	\$23.00	\$22.00	\$94.00	\$95.00
215	\$23.00	\$22.00	\$94.00	\$95.00
235	\$23.00	\$22.00	\$94.00	\$95.00
255	\$23.00	\$22.00	\$94.00	\$95.00
305	\$23.00	\$22.00	\$94.00	\$95.00
305	\$23.00	\$22.00	\$94.00	\$95.00

SCHEDULE 2 – Cumulative Four-Year Nominal Increase in Fares (to 2012)

Comparison between the Government and IPART's draft proposal³

Distance Band (km)	Adult Single Government	Adult Single IPART	Adult Weekly Government	Adult Weekly IPART
5	\$1.40	\$0.80	\$11.00	\$6.00
10	\$1.40	\$1.00	\$10.00	\$7.00
15	\$1.20	\$1.00	\$9.00	\$7.00
20	\$1.20	\$1.20	\$9.00	\$9.00
25	\$1.00	\$1.40	\$8.00	\$11.00
30	\$0.80	\$1.60	\$7.00	\$14.00
35	\$1.20	\$2.00	\$9.00	\$16.00
45	\$0.60	\$2.20	\$9.00	\$18.00
55	\$0.40	\$2.40	\$9.00	\$19.00
65	\$0.40	\$3.00	\$10.00	\$21.00
75	\$0.40	\$2.80	\$9.00	\$23.00
85	\$0.40	\$2.80	\$11.00	\$24.00
95	\$0.40	\$3.00	\$14.00	\$24.00
105	\$0.40	\$3.80	\$15.00	\$26.00
115	\$0.40	\$3.60	\$19.00	\$27.00
125	\$0.40	\$3.40	\$23.00	\$27.00
135	\$0.40	\$4.40	\$21.00	\$31.00
155	\$0.40	\$4.20	\$26.00	\$31.00
175	\$0.40	\$5.00	\$22.00	\$36.00
195	\$1.00	\$3.00	\$30.00	\$34.00
215	\$1.00	\$3.00	\$30.00	\$34.00
235	(\$3.00)	(\$1.00)	\$16.00	\$20.00
255	(\$3.00)	(\$1.00)	\$16.00	\$20.00
305	(\$7.00)	(\$5.00)	\$3.00	\$7.00
305	(\$7.00)	(\$5.00)	\$3.00	\$7.00

³ Based on current CPI forecasts. If actual CPI is higher/lower in the year that the new fares are set to apply, then the fare increases may also be higher/lower.

SCHEDULE 3 – Forecast Nominal Fares (to 2012) – Government proposal

Adult Single Fare

Distance Band	Current	2009	2010	2011	2012
5	\$2.60	\$3.00	\$3.40	\$3.80	\$4.00
10	\$3.00	\$3.40	\$4.00	\$4.20	\$4.40
15	\$3.40	\$4.00	\$4.20	\$4.40	\$4.60
20	\$3.80	\$4.20	\$4.60	\$4.80	\$5.00
25	\$4.20	\$4.60	\$4.80	\$5.00	\$5.20
30	\$4.60	\$4.60	\$5.00	\$5.20	\$5.40
35	\$4.60	\$4.80	\$5.20	\$5.40	\$5.80
45	\$5.60	\$5.60	\$5.60	\$5.80	\$6.20
55	\$6.60	\$6.80	\$7.00	\$7.00	\$7.00
65	\$7.20	\$7.40	\$7.60	\$7.60	\$7.60
75	\$8.60	\$8.80	\$9.00	\$9.00	\$9.00
85	\$9.60	\$9.80	\$10.00	\$10.00	\$10.00
95	\$10.60	\$10.80	\$11.00	\$11.00	\$11.00
105	\$11.00	\$11.20	\$11.40	\$11.40	\$11.40
115	\$12.20	\$12.40	\$12.60	\$12.60	\$12.60
125	\$13.60	\$13.80	\$14.00	\$14.00	\$14.00
135	\$13.80	\$14.00	\$14.20	\$14.20	\$14.20
155	\$15.80	\$16.00	\$16.20	\$16.20	\$16.20
175	\$18.00	\$18.20	\$18.40	\$18.40	\$18.40
195	\$22.00	\$23.00	\$23.00	\$23.00	\$23.00
215	\$22.00	\$23.00	\$23.00	\$23.00	\$23.00
235	\$26.00	\$23.00	\$23.00	\$23.00	\$23.00
255	\$26.00	\$23.00	\$23.00	\$23.00	\$23.00
305	\$30.00	\$23.00	\$23.00	\$23.00	\$23.00
305	\$30.00	\$23.00	\$23.00	\$23.00	\$23.00

SCHEDULE 4 – Forecast Nominal Fares (to 2012) – Government proposal

Adult Weekly Fare

Distance Band	Current	2009	2010	2011	2012
5	\$21.00	\$24.00	\$27.00	\$30.00	\$32.00
10	\$25.00	\$27.00	\$32.00	\$34.00	\$35.00
15	\$28.00	\$32.00	\$34.00	\$35.00	\$37.00
20	\$31.00	\$34.00	\$37.00	\$38.00	\$40.00
25	\$34.00	\$37.00	\$38.00	\$40.00	\$42.00
30	\$36.00	\$37.00	\$40.00	\$41.00	\$43.00
35	\$37.00	\$38.00	\$42.00	\$43.00	\$46.00
45	\$41.00	\$42.00	\$43.00	\$45.00	\$50.00
55	\$44.00	\$46.00	\$48.00	\$51.00	\$53.00
65	\$48.00	\$50.00	\$53.00	\$55.00	\$58.00
75	\$51.00	\$53.00	\$55.00	\$58.00	\$60.00
85	\$54.00	\$57.00	\$60.00	\$63.00	\$65.00
95	\$56.00	\$60.00	\$63.00	\$67.00	\$70.00
105	\$58.00	\$62.00	\$66.00	\$69.00	\$73.00
115	\$60.00	\$65.00	\$69.00	\$74.00	\$79.00
125	\$63.00	\$69.00	\$74.00	\$80.00	\$86.00
135	\$69.00	\$74.00	\$79.00	\$85.00	\$90.00
155	\$75.00	\$81.00	\$88.00	\$94.00	\$101.00
175	\$79.00	\$84.00	\$90.00	\$95.00	\$101.00
195	\$86.00	\$94.00	\$101.00	\$109.00	\$116.00
215	\$86.00	\$94.00	\$101.00	\$109.00	\$116.00
235	\$100.00	\$94.00	\$101.00	\$109.00	\$116.00
255	\$100.00	\$94.00	\$101.00	\$109.00	\$116.00
305	\$113.00	\$94.00	\$101.00	\$109.00	\$116.00
305	\$113.00	\$94.00	\$101.00	\$109.00	\$116.00