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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *in his official  
capacity as President of the United  
States*, et al.,

Defendants.

20 Civ. 2340 (EGS)

**PLAINTIFFS' OPPOSITION TO DEFENDANTS' CROSS-MOTION FOR SUMMARY  
JUDGMENT AND REPLY IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY  
JUDGMENT**

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## INTRODUCTION

In the throes of the COVID-19 pandemic, Plaintiffs and their agencies enacted and implemented dozens of new laws and procedures to promote social distancing and protect the public health. Paramount among these new initiatives were extensive efforts to expand mail-in voting in time for the November 3 general election—an expansion that depends upon the timely delivery of mail. The United States Postal Service upended Plaintiffs’ careful considerations by disrupting the storied reliability of postal operations and turning its back on its age-old maxim of “every piece, every day.”

The central facts underlying Plaintiffs’ claims are not in dispute. On the eve of an election marred by a public health crisis, the Postal Service implemented a series of wide-ranging, unprecedented changes that depressed service performance and caused nationwide mail delays. Plaintiffs have standing to challenge the Postal Service’s ill-advised policy changes because the undisputed factual record on summary judgment shows that Plaintiffs suffer ongoing, concrete injuries due to these delays.

Defendants attempt to disavow their policy changes and wave away the resulting chaos, but the factual record refutes their down-is-up approach—the Postal Service drastically changed postal operations without the due consideration required by the governing statutory scheme. Tellingly, Defendants offer no written analysis, advisory opinion, or *any* contemporaneous documentation evaluating the impact of their radical policy changes. Plaintiffs’ *ultra vires* claims are thus properly before this Court, and should be decided in Plaintiffs’ favor, because the Postal Service’s actions clearly flout the unequivocal mandates of its governing statutes. Plaintiffs are also entitled to relief under the Elections Clause based on the ample undisputed evidence that Defendants’ policy changes were intended to, and do, impair Plaintiffs’ administration of elections in their States.

Accordingly, Plaintiffs’ motion for summary judgment should be granted, the Postal Policy Changes<sup>1</sup> should be permanently enjoined, and the Court should grant such additional relief—including appointment of a special master—as is necessary to assure compliance with its orders.

### STATEMENT OF FACTS

Despite the great weight of evidence to the contrary, Defendants continue to assert that the Postal Policy Changes are not changes at all, but, rather, part of the regular process of addressing ongoing operational issues. *See* Defs.’ Mem. Opp. Summ. J. 4-13 (ECF No. 67) (“Defs.’ Mem.”). That assertion is belied by the U.S. Postal Service’s own Office of the Inspector General (“OIG”) investigation, agency records, and witness testimony—all of which show the agency adopted “transformative” changes that have led to unprecedented mail delays for months on end.

The record establishes that Postmaster General Louis DeJoy and other operations executives launched the Postal Policy Changes to “transform” the U.S. Postal Service following DeJoy’s swearing-in on June 15, 2020. Pls.’ Stmt. of Facts ¶¶ 130-31 (ECF No. 60-1); Pls.’ Counter-Stmt. of Facts ¶¶ 65-69 (ECF No. 71-2). As the OIG concluded, in “June and July 2020,” the U.S. Postal Service “initiated various significant cost reduction strategies on top of three initiatives the Postmaster General launched.” *Id.* ¶ 65 (citing Office of Inspector General, U.S. Postal Service, Report No. 20-292-R21, *Operational Changes to Mail Delivery* (Oct. 19,

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<sup>1</sup> “Postal Policy Changes” refers to the five operational changes described in Plaintiffs’ opening memorandum and challenged in this motion for summary judgment: (1) increased reduction of high-speed sorting machines without local input; (2) a new effort to reduce work hours, especially overtime; (3) the first-ever organization-wide policy to eliminate late and extra trips; (4) a new initiative altering letter carrier workflows to reduce work hours; and (5) the decision not to treat all election mail entered as marketing mail on an expedited First Class basis. Pls.’ Mem. Supp. Summ. J. 3 (ECF No. 60).

2020) (ECF No. 70-1) (the “October 19 OIG Report”). These initiatives and strategies included each of five the Postal Policy Changes challenged here, *id.* ¶¶ 68-69, none of which were adopted with any sort of analysis on how they could impact service performance, *id.* ¶ 70. “[G]iven the challenges resulting from the COVID-19 pandemic, including reduced employee availability, increased package volume, and a heightened focus on voting by mail, these operational initiatives should have been analyzed and evaluated ahead of deployment to fully understand the impact of implementation.” *Id.* ¶ 71.

Instead, Defendants plowed ahead with their initiatives and “transformational changes” without regard for service performance. *Id.* ¶¶ 67, 70-71. Predictably, and immediately, “mail service performance significantly dropped beginning in July 2020, directly corresponding to implementation of the operational changes and initiatives.” *Id.* ¶ 74; *see also* Pls.’ Mem. Supp. Summ. J. 5-7 (ECF No. 60) (“Pls.’ Mem.”). Indeed, on-time delivery of First Class mail dropped from a consistent range between 90 to 94 percent in the preceding six months to 85.26 percent in mid-July 2020—the same week that the policy limiting late and extra trips was circulated. Pls.’ Stmt. of Facts ¶ 97; *see also* Pls.’ Mem. 5.

Even after the impact on service became clear, Defendants dug in, continuing to carry out the Postal Policy Changes. Pls.’ Stmt. of Facts ¶ 131. Indeed, Defendants failed to fully rescind or reverse many of the challenged Postal Policy Changes despite multiple district court injunctions to return mail processing and delivery to the status quo ante.<sup>2</sup> As relevant here,

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<sup>2</sup> *See NAACP v. U.S. Postal Serv.*, No. 20-cv-2295 (EGS), 2020 WL 5995032 (D.D.C. Oct. 10, 2020); *Richardson v. Trump*, No. 20-cv-2262 (EGS), 2020 WL 5969270 (D.D.C. Oct. 8, 2020); *Pennsylvania v. DeJoy*, No. 20-cv-4096 (GAM), 2020 WL 5763553 (E.D. Pa. Sept. 29, 2020); *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS), 2020 WL 5763869 (D.D.C. Sept. 28, 2020); *New York v. Trump*, No. 20-cv-2340 (EGS), 2020 WL 5763775 (D.D.C. Sept. 27, 2020); *Jones v. U.S. Postal Serv.*, No. 20-cv-6516 (VM), 2020 WL 5627002 (S.D.N.Y. Sept. 21, 2020); *Washington v. Trump*, No. 20-cv-3127 (SAB), 2020 WL 5568557 (E.D. Wash. Sept. 17, 2020).

Defendants disregarded part of the preliminary injunction this Court issued against four of the five Postal Policy Changes on September 27, 2020, *id.* ¶¶ 70-72, issuing several vague documents that purported to offer updated guidance instead, *see generally* ECF No. 64. On October 23, Defendants filed a Status Report cataloguing these documents and the steps the agency had taken to date to comply with injunctions of this Court and other courts. ECF No. 64. These steps were insufficient, as this Court has already held.<sup>3</sup> *See* Minute Order Granting Emergency Mot. to Enforce and Monitor Compliance With Prelim. Inj., *NAACP v. U.S. Postal Serv.*, No. 20-cv-2296 (EGS) (D.D.C. Oct. 27, 2020) (the “NAACP Minute Order”).

Specifically, Defendants failed to remedy the unlawful reduction on late trips and extra trips, *see* Pls.’ Stmt. of Facts ¶¶ 70-72, until the Court separately ordered them to do so on October 27, *see* NAACP Minute Order. At the same time, some postal facilities have not been able to make up the capacity lost by the removal of sorting machines. Pls.’ Stmt. of Facts ¶ 113 (Coradi Suppl. Decl. ¶ 10). And many of Defendants’ strategies to reduce overtime also remain ongoing. Pls.’ Counter-Stmt. of Facts ¶ 69. As a result, service delays have persisted. *See id.* ¶¶ 84-89; Pls.’ Stmt. of Facts ¶¶ 105-07.

Today, the Postal Service’s service performance remains severely depressed. Pls.’ Counter-Stmt. of Facts ¶¶ 84-89; Pls.’ Stmt. of Facts ¶¶ 105-07. The most recent available data shows that the weekly average for on-time delivery of First Class mail also declined by 5.5 points—from 88.76 percent for the week of October 3, 2020 to 83.26 for the week of October 17, 2020. Pls.’ Counter-Stmt. of Facts ¶ 86. In other words, the most recent data shows that service performance for First Class mail *is still even lower* than it was following the sudden drop to

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<sup>3</sup> For the reasons explained *infra* Parts I.A and V, Defendants’ intervening steps to come into partial compliance with this Court’s orders do not defeat Plaintiffs’ standing or undermine any of Plaintiffs’ requested relief.

85.26 percent in mid-July 2020. *Id.*; Pls.’ Stmt. of Facts ¶ 97.

These ongoing delays continue to harm Plaintiffs, who are in the process of administering an election for President, Vice President, and other federal and state offices, that is relying heavily on mail-in ballots. Pls.’ Stmt. of Facts ¶¶ 143-54, 156. Voters have reported going *weeks* without receiving their absentee ballots, despite receiving notices from the Postal Service that their ballots would be arriving soon. Pls.’ Counter-Stmt. of Facts ¶¶ 78-80. And because Defendants have suspended some of the Postal Policy Changes only until the election, if at all, *see* Pls.’ Counter-Stmt. of Facts ¶¶ 13, 43, the risk that mail delays will *worsen* immediately after the election—during a crucial period while returning ballots are still being delivered in Plaintiffs’ jurisdictions, *see infra* Part IV—is high.

## ARGUMENT

### I. The Court has subject-matter jurisdiction, and Plaintiffs’ claims are reviewable.

#### A. Plaintiffs have standing.

Plaintiffs identified specific facts in their opening memorandum demonstrating that they have standing at the summary judgment stage. *See* Pls.’ Mem. 8-13; Pls.’ Stmt. of Facts ¶¶ 4-12, 65, 95-115, 130-31, 136, 143, 145-51, 156-57, 159, 163, 166-69, 173-78. Notwithstanding that this comprehensive factual showing is largely *admitted*,<sup>4</sup> Defendants argue that Plaintiffs have

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<sup>4</sup> Defendants admit 37 of the 56 factual statements cited above. *See* Defs.’ Counter-Stmt. of Facts ¶¶ 4-12, 96-105, 108-10, 112, 114-15, 131, 145-51, 157, 173-75 (ECF No. 67-1). To the limited extent Defendants deny or dispute Plaintiffs’ statements of fact, Defendants respond that nine of the cited paragraphs assert legal conclusions and not matters of fact, *see id.* ¶¶ 159, 163, 166-69, 176-78; and that three of the assertions of fact are not “material to the outcome of this suit” because of post-injunction guidance documents issued to USPS employees, *id.* ¶¶ 65, 130, 136. Neither of these disagreements presents a genuine dispute of material fact that can defeat summary judgment; as a matter of law, steps that the agency took to comply with a preliminary injunction *in this very lawsuit* cannot defeat standing. *See District of Columbia v. U.S. Dep’t of Agric.*, No. 20-cv-00119 (BAH), 2020 WL 6123104, at \*5 n.10 (D.D.C. Oct. 18, 2020). The

not established sufficient future injury caused by the Postal Policy Changes.<sup>5</sup> These arguments misstate the law, mischaracterize the factual record, and should be rejected.

**1. Plaintiffs have suffered and will suffer concrete injuries.**

The Court previously held that Plaintiffs’ motion for preliminary injunction presented sufficient proof of “on-going non-speculative harms.” *New York v. Trump*, No. 20-cv-2340 (EGS), 2020 WL 5763775, at \*6 (D.D.C. Sept. 27, 2020). Defendants do not genuinely dispute that the Postal Policy Changes injure Plaintiffs. As noted, Defendants *admit* most of these injuries, yet contend that Plaintiffs must meet a newly-crafted test to show “*material* mail delays in the future . . . of a material length.” Defs.’ Mem. 16. This argument is wrong.

First, the well-established injury-in-fact standard contains no such requirements. Defendants conspicuously cite no authority in support of their new test, nor could they. A plaintiff must only show a “concrete and particularized” injury to help “ensure that the plaintiff has a personal stake in the outcome of the controversy.” *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 158 (2014) (internal quotation marks omitted); *see also Halbig v. Burwell*, 758 F.3d 390, 396 (D.C. Cir. 2014) (“[E]ven an ‘identifiable trifle’ of harm may establish standing.”) (quoting *United States v. Students Challenging Regulatory Agency Procedures*, 412 U.S. 669, 689 n.14 (1973)). Here, the undisputed facts establish Plaintiffs’ direct injuries—including disruptions to Plaintiffs’ plans to combat coronavirus transmission and provide safe alternatives to in-person voting; the imposition of direct financial costs to state and local agencies; and

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remaining seven disputed statements of fact all go to whether the Postal Policy Changes caused Plaintiffs’ injuries, *see* Defs.’ Counter-Stmt. of Facts ¶¶ 95, 106-07, 111, 113, 143, 156; a question that cannot be genuinely disputed for the reasons stated *infra* Part I.A.2.

<sup>5</sup> Defendants only contest the first two elements of the standing inquiry—injury and causation—and do not dispute that a favorable decision by this Court would redress Plaintiffs’ injuries. *See* Defs.’ Mem. 14-17.

administrative burdens newly imposed on state and local agencies. These injuries more than adequately demonstrate Plaintiffs' stake in this action. *See* Pls.' Mem. 8-12; *New York*, 2020 WL 5763775, at \*12.

Second, the precise future injury Plaintiffs predicted would occur is in fact occurring—Plaintiffs' residents are choosing to vote in-person due to Postal Service failures to timely deliver their absentee ballots. *See* Pls.' Counter-Stmt. of Facts ¶¶ 78, 80 (the New York State Office of the Attorney General “has received over 25 complaints from voters as of October 27 who did not receive their absentee ballots in the mail in a timely manner”; and at least one complainant intended to vote in person because of mail delays in receiving their ballot); *id.* ¶ 81 (the New York State Office of the Attorney General has “also received over 20 complaints about incredibly long lines at voting sites,” with multiple voters waiting over five hours to cast their vote at early voting locations); *id.* ¶ 83 (testimony from Douglas Kellner, Co-Chair and Commissioner of the New York State Board of Elections, that “many of the issues we saw in the June primary and anticipated for the November general election are occurring”). Article III does not require Plaintiffs to suffer even greater injuries—for the Postal Service to delay or fail to deliver even more absentee ballots, or for even more of Plaintiffs' residents to risk COVID-19 exposure by voting in person—in order to show standing. *See Dep't of Commerce v. New York*, 139 S. Ct. 2551, 2565 (2019) (states had standing based on future risk that “as little as 2%” of noncitizen households would not respond to the decennial census); *Susan B. Anthony List*, 573 U.S. at 158 (future injuries support standing “if the threatened injury is certainly impending, or there is a substantial risk that the harm will occur”) (internal quotation marks omitted).

Defendants argue that Plaintiffs are asserting public health injuries of their residents in their role as *parens patriae*. *See* Defs.' Mem. 16-17. The Court already rejected this argument,



*New York*, 2020 WL 5763775, at \*11, and for good reason: The undisputed facts show that Plaintiffs’ efforts to mitigate the spread of coronavirus are aimed at protecting the public health of their jurisdictions as a whole, *see* Defs.’ Counter-Stmt. of Facts ¶¶ 4-9, 143, 150-51, 158-59 (ECF No. 67-1), and the law is clear that these public health risks and Plaintiffs’ efforts to respond to them pose direct proprietary injuries to governmental plaintiffs, *see Air All. Houston v. EPA*, 906 F.3d 1049, 1059-60 (D.C. Cir. 2018); *New York v. U.S. Dep’t of Homeland Sec.*, No. 19-cv-7777 (GBD), 2020 WL 4347264, at \*10 (S.D.N.Y. July 29, 2020), *stayed on other grounds*, 974 F.3d 210 (2d Cir. 2020).

Defendants also argue that Plaintiffs’ financial and administrative injuries are “self-inflicted” to “try to manufacture injury.” Defs.’ Mem. 17. This astonishing contention—that Plaintiffs expended significant resources to modify state and local agency operations to counteract mail delays *not* to effectively serve their residents who rely on public assistance, healthcare benefits, child support enforcement, and other services, but instead so they could “manufacture injury” for litigation purposes—is unsupported, categorically false, and counter to Defendants’ own admissions.<sup>6</sup> Plaintiffs responded to unprecedented mail delays by expending resources to ensure that their residents could safely exercise their right to vote and by altering agency practices to assure the continued effectiveness of agency programs in compliance with federal, state, and local law. Pls.’ Mem. 9-10; *see, e.g.*, Defs.’ Counter-Stmt. of Facts ¶¶ 10-11,

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<sup>6</sup> Defendants’ counter-statement of facts *admits* every single one of Plaintiffs’ assertions of fact on this score, including that “[m]ail delays have impaired Plaintiffs’ ability to perform legally mandated tasks, including provide health coverage and prescription medications, ensure that children and families receive court-ordered financial and medical support, and send applications for SNAP and other benefits to eligible residents,” and that “Plaintiffs have expended resources in an effort to address these disruptions.” *See* Defs.’ Counter-Stmt. of Facts ¶¶ 10-11, 145-49.

145-49. Plaintiffs could not otherwise avoid these injuries absent the relief sought through this litigation. The doctrine that a plaintiff may not manufacture its own standing therefore has no application here.<sup>7</sup> *See District of Columbia v. U.S. Dep't of Agric.*, 444 F. Supp. 3d 1, 35 (D.D.C. 2020) (rejecting agency's argument that states' injuries in response to challenged regulation were self-inflicted).

## 2. Plaintiffs' injuries are traceable to the Postal Policy Changes.

The Court also previously held that Plaintiffs' motion for preliminary injunction presented sufficient proof that their injuries were "fairly traceable" to the Postal Policy Changes, *New York*, 2020 WL 5763775, at \*5-6, and there is no genuine dispute of material fact that the Court's conclusion was correct.

*First*, in June and July 2020, the Postal Service "announced and implemented" a number of operational changes "to how it collects, processes and delivers mail." *Id.* at \*2; Pls.' Mem. 2-5; *see also* Pls.' Counter-Stmt. of Facts ¶¶ 65-69 (citing October 19 OIG Report 1-2, 10). *Second*, the collective implementation of all of these operational changes led to nationwide mail delays. *New York*, 2020 WL 5763775, at \*3; Pls.' Mem. 5-7; Pls.' Counter-Stmt. of Facts ¶¶ 74-75 (citing October 19 OIG Report 3, 14-15). The implementation of the Cintron Guidelines, specifically, greatly reduced the number of late and extra trips. *See* Pls.' Mem. 5; Pls.' Stmt. of Facts ¶¶ 70-75. *Third*, although some of these operational changes were suspended in August or September 2020, the agency's restrictions on late and extra trips were operational until this Court granted emergency motions to enforce in related cases on October 27, 2020. *See NAACP Minute*

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<sup>7</sup> In any event, Defendants only argue that Plaintiffs' financial and administrative injuries are "self-inflicted"; they do not contend the same regarding injuries caused by the impairment to Plaintiffs' efforts to protect the public health and provide safe alternatives to in-person voting. Defs.' Mem. 17. These public health injuries alone support standing, as explained *supra*.

Order; Pls.’ Mem. 5; Pls.’ Stmt. of Facts ¶¶ 70-75. *Fourth*, the Postal Service’s service performance scores, and the number of late trips and extra trips, remain well below the pre-July 2020 rates. *See* Pls.’ Mem. 5-7; Defs.’ Counter-Stmt. of Facts ¶¶ 105, 115; Pls.’ Counter-Stmt. of Facts ¶¶ 84-90 (citing late October 2020 data). These un rebutted facts show that “the on-going non-speculative harms” Plaintiffs suffered “are ‘fairly traceable’ to the Postal Policy Changes.” *New York*, 2020 WL 5763775, at \*6; *see* Pls.’ Stmt. of Facts ¶¶ 106-07.

Defendants contest causation on several grounds, all of which are unpersuasive. First, Defendants contend that the persistence of mail delays following the Court’s preliminary injunction establishes that the enjoined practices cannot be causing current delays. *See* Defs.’ Mem. 13-14. But as Plaintiffs’ opening memorandum explained, Defendants never fully complied with the Court’s orders—in particular by failing until *just two days ago* to rescind the Cintron Guidelines that restricted late trips and extra trips. *See* Pls.’ Mem. 5, 12-13 n.4; *see also* Pls.’ Stmt. of Facts ¶¶ 70-75; Pls.’ Counter-Stmt. of Facts ¶ 91. Indeed, in response to the emergency motions to enforce filed in *NAACP v. U.S. Postal Service*, No. 20-cv-2295 (EGS), *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS), and *Richardson v. Trump*, No. 20-cv-2262 (EGS), this Court agreed that Defendants had not complied with the preliminary injunctions and ordered immediate relief and daily monitoring to assure that “USPS personnel . . . perform late and extra trips to the maximum extent necessary to increase on-time mail deliveries, particularly for Election Mail,” and to direct that “late and extra trips should be performed to the same or greater degree than they were performed prior to July 2020 when doing so would increase on-time mail deliveries.” *NAACP Minute Order*.

Second, Defendants argue that a “variety of issues” contribute to mail delays, including the coronavirus pandemic, wildfires, and bad weather.<sup>8</sup> Defs.’ Mem. 16. But the Court already rejected Defendants’ attempt to create a causal connection to the coronavirus pandemic, noting that “the sharp decline in on-time deliveries occurred in July and August 2020, months after COVID-19 infections began to spike in the United States in March 2020.” *New York*, 2020 WL 5763775, at \*6 (citing Pls.’ Reply Supp. Prelim. Inj. 6 (ECF No. 40)). That Defendants plowed ahead with the Postal Policy Changes in the midst of a once-in-a-century pandemic is no excuse for them to avoid review.

Additionally, Defendants’ attempt to blame wildfires and bad weather fails. As a matter of law—and even assuming, arguendo, that wildfires and bad weather could be blamed for the sharp drops in on-time performance that happen to coincide with implementation of the Postal Policy Changes—traceability “does not require that the [challenged action] be the most immediate cause, or even a proximate cause, of the plaintiffs’ injuries.” *Attias v. Carefirst, Inc.*, 865 F.3d 620, 629 (D.C. Cir. 2017); *see also New York v. U.S. Dep’t of Commerce*, 351 F. Supp. 3d 502, 622 (S.D.N.Y. 2019) (“Even in a dry season, it is fair to trace the fire to the arsonist.”), *aff’d*, 139 S. Ct. 2551. Even when a statute imposes liability based on proximate causation principles, it is typical that a plaintiff can prevail when an injury has multiple causes; as the

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<sup>8</sup> Defendants misleadingly cite a district court order from the *Jones v. U.S. Postal Service* litigation which observed that a “variety of issues . . . contribute to the delays and are outside of USPS’s control.” Order, *Jones v. U.S. Postal Serv.*, No. 20-cv-6516 (VM), ECF No. 82, at 6 (S.D.N.Y. Oct. 9, 2020) (quoted at Defs.’ Mem. 16). That observation was in the context of the district court’s decision not to appoint an independent monitor in that case, and had nothing to do with standing. *See id.* at 4-6. In fact, as Defendants fail to note, when the district court in *Jones* did address standing—in granting the plaintiffs’ motion for a preliminary injunction in that case—the court expressly rejected Defendants’ causation arguments and held that the evidence “makes clear that the challenged mail procedures have slowed mail service and are thus a de facto cause of Plaintiffs’ claimed injuries.” *Jones v. U.S. Postal Serv.*, No. 20-cv-6516 (VM), 2020 WL 5627002, at \*13 (S.D.N.Y. Sept. 21, 2020).

Supreme Court has explained, it is entirely “common for injuries to have multiple proximate causes.” *Staub v. Proctor Hosp.*, 562 U.S. 411, 420 (2011). Article III imposes no greater limit.

On the facts, Defendants’ evidence falls far short of establishing that any factors other than the Postal Policy Changes caused mail delays. Under Rule 56, Defendants may only rely on factual material that can “be presented in a form that would be admissible in evidence.” Fed. R. Civ. P. 56(c)(1)(B). Defendants’ proffered testimony is inadmissible because it is conclusory and speculative. For example, the factual allegations set forth in the Crawford Declaration (ECF No. 66-25, Defs.’ Ex. 21)—that some portion of service delays in some localities on certain days were caused by snowstorms or wildfires—are entirely conclusory. Defendants do not describe the basis for this conclusion, explain their methodology for cherry-picking the particular dates in question, or specify any indicia of reliability.<sup>9</sup> *See id.*; *cf. Greene v. Dalton*, 164 F.3d 671, 675 (D.C. Cir. 1999) (recognizing that “some statements are so conclusory” as to be disregarded on summary judgment). Defendants’ other declarations suffer from similar defects. *See* Garrett Suppl. Decl. ¶ 3 (ECF No. 66-37, Defs.’ Ex. 33) (listing the number of Postal Service offices that were “impacted” by hurricanes, but making no effort to describe the length or extent of those

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<sup>9</sup> This testimony should be disregarded for the separate reason that it relies on information that Defendants failed to produce in discovery. The Crawford Declaration proffers the witness’s testimony based on the “Change Suspension Discontinuance Center,” described as a system that collects local reports of delivery issues to purportedly allow management to “determine the root causes of failures in delivery performance on a daily basis.” Crawford Decl. ¶ 2 (ECF No. 66-25, Defs.’ Ex. 21). Plaintiffs’ requests for expedited discovery sought, with the Court’s leave, “all documents” and “data relating to service performance of mail transportation, processing, or delivery, or any other metric of service performance.” *See* Pls.’ First Request for Production of Documents to Defs., at Request No. 5 (ECF No. 38-9). Data from the “Change Suspension Discontinuance Center,” as summarized in the Crawford Declaration, is plainly responsive to this discovery request, but Defendants failed to produce or even acknowledge the existence of this information, first referencing it only in their summary judgment opposition. Having “offered no explanation to justify [their] failure to produce this [data] during discovery,” they should be precluded from relying on this evidence. *Howard v. Gray*, 291 F.R.D. 6, 10 (D.D.C. 2013).

purported impacts); Dearing Decl. ¶ 13 (ECF No. 66-36, Defs.’ Ex. 32) (conceding that the declarant did not undertake a “comprehensive” or “complete” review of factors impacting service).

Indeed, Defendants’ new evidence consists of little more than the unremarkable observation that natural disasters and similar events *may* impact mail delivery. *See* Garrett Decl. ¶ 10 (ECF No. 66-26, Defs.’ Ex. 22) (hurricanes “may” effect mail processing plants); Dearing Decl. ¶¶ 6, 9 (factors like “weather events, natural disasters and civic unrest” “may be affecting service performance since the beginning of the pandemic”). But a party’s “mere speculations are insufficient to create a genuine issue of material fact.” *Bennett v. Solis*, 729 F. Supp. 2d 54, 67 (D.D.C. 2010) (internal quotation marks omitted). And Defendants’ evidence nowhere suggests that weather events and other similar occurrences—which presumably impact mail delivery every year, not just in 2020—are the sole cause of the dramatic nationwide service degradation that began after Defendants instituted the Postal Policy Changes. To the contrary, Defendants’ most recent data reflects that regions experiencing wildfires, for example, are *not* experiencing delays as significant as other regions with no fires. *See* Pls.’ Counter-Stmt. of Facts ¶ 90 (on October 28, 2020, reflecting on-time delivery of 88.87% of first class mail around Sacramento, but 81.86% in Southern New Jersey and 61.57% in the Philadelphia metropolitan region); *see also* U.S. Forest Service, Public Wildfire Information Website, <https://inciweb.nwcg.gov/> (showing wildfires near Sacramento but not near Southern New Jersey or metropolitan Philadelphia) (last visited Oct. 29, 2020).

The Court should accordingly conclude that Plaintiffs have met their burden to establish standing, and that Defendants’ evidence is insufficient to create any material dispute of fact.

**B. The Court has jurisdiction to hear Plaintiffs' 39 U.S.C. § 3661 claim.**

As the Court previously concluded for preliminary injunction purposes, the Court has subject-matter jurisdiction over Plaintiffs' section 3661 claim. *See New York*, 2020 WL 5763775, at \*8. Defendants' cross-motion presents no reason for the Court to change this conclusion.

First, Defendants concede that they have not presented any mandatory authority to support the proposition that section 3662 “removed the district courts’ jurisdiction over claims regarding postal rates and services.” Defs.’ Mem. 18-19. Instead, Defendants ask this Court to divest itself of jurisdiction over Plaintiffs’ section 3661 claim based on a series of “considerations” described in *Nader v. Volpe*, 466 F.2d 261 (D.C. Cir. 1972). But that decision *supports* Plaintiffs’ position: the D.C. Circuit there explained that “when Congress has specified a procedure for judicial review of administrative action, courts will not make nonstatutory remedies available *without a showing of patent violation of agency authority or manifest infringement of substantial rights irremediable by the statutorily-prescribed method of review.*” *Id.* at 266 (emphasis added). Plaintiffs’ *ultra vires* claim involves the very type of “violation of agency authority” contemplated by the court in *Nader*. *See infra* Part I.C.

Second, Defendants contort the plain meaning of section 3662 in arguing that the word “may” means that affected parties “may lodge a complaint with the PRC, but may also choose to take no action at all.” Defs.’ Mem. 20. Nothing indicates that Congress enacted this statute for the purpose of letting aggrieved parties know that they had the option *not* to challenge unlawful agency conduct, and Defendants’ creative contention is inconsistent with the maxim that courts “presume that Congress intend[s] to give [a] term its ordinary meaning” when legislating. *Aid*

*Ass'n for Lutherans v. U.S. Postal Serv.*, 321 F.3d 1166, 1176 (D.C. Cir. 2003).<sup>10</sup> As Plaintiffs previously explained—and this Court agreed—“the permissive ‘may’ coupled with the use of the mandatory ‘shall’ suggests that Sections 3662(a) and 3663 were not intended to be the exclusive avenue for bringing a procedural challenge to the USPS's failure to comply with Section 3661.” *New York*, 2020 WL 5763775, at \*7.

Finally, Defendants argue that even if the *Free Enterprise* factors mitigated in favor of finding subject-matter jurisdiction at the preliminary injunction stage, jurisdiction is improper now because Plaintiffs’ “election-related injuries will be moot at or immediately after the time the Court issues a decision on Plaintiffs’ motion for summary judgment.” Defs.’ Mem. 23. This argument ignores that under California law, a ballot postmarked by Election Day will be counted if received by November 20, and under New Jersey and New York law, a ballot postmarked by Election Day will be counted if received by November 10, so mail delays will continue to impose election-related injuries on Plaintiffs New Jersey, New York, New York City, and San Francisco for several weeks. *See* Cal. Elec. Code § 3020(d) (West 2020); N.J. Exec. Order No. 177, 52 N.J.R. § 1701(b) (2020); N.Y. Elec. Law § 8-412 (McKinney 2020). And *all* Plaintiffs have suffered and will continue to suffer unrefuted financial and proprietary injuries entirely unrelated to the timing of the general election, which will not become moot after Election Day. Defs.’ Counter-Stmt. of Facts ¶¶ 10-11, 145-49. There is no basis for the Court to abdicate its authority to exercise jurisdiction over Plaintiffs’ claims.

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<sup>10</sup> Defendants’ attempted reliance on *Foster* is inapposite as that case concerned allegations of “fraud, conversion, unjust enrichment, and misappropriation of trade secrets,” in contrast to the purely legal questions at issue in Plaintiffs’ section 3661 claim. *Foster v. Pitney Bowes Corp.*, 549 F. App’x 982, 984 (Fed. Cir. 2013).



**C. Plaintiffs’ statutory claims are reviewable under the *ultra vires* doctrine.**

Defendants’ contrary claims notwithstanding, “the case law in this circuit is clear that judicial review is available whe[re],” as here, “an agency acts *ultra vires*.” *Aid Ass’n for Lutherans*, 321 F.3d at 1173. Because the “courts will ordinarily presume that Congress intends the executive to obey its statutory commands,” *Chamber of Commerce v. Reich*, 74 F.3d 1322, 1328 (D.C. Cir. 1996) (internal quotation marks and citation omitted), the D.C. Circuit has repeatedly held that an *ultra vires* cause of action will lie *against the Postal Service* where the agency acts outside the boundaries of its statutory authority. *See, e.g., Sears, Roebuck & Co. v. U.S. Postal Serv.*, 844 F.3d 260, 265 (D.C. Cir. 2016); *N. Air Cargo v. U.S. Postal Serv.*, 674 F.3d 852, 858 (D.C. Cir. 2012); *Aid Ass’n for Lutherans*, 321 F.3d at 1172-73.

Here, Plaintiffs’ section 3661 claim “‘clearly admits of judicial review.’” *New York*, 2020 WL 5763775, at \*8 (quoting *Aid Ass’n for Lutherans*, 321 F.3d at 1173); *accord NAACP*, 2020 WL 5995032, at \*10. The gravamen of Plaintiffs’ claim under 39 U.S.C. § 3661(b) is that the Postal Service “acted ‘in excess of its delegated powers and contrary to a specific [statutory] prohibition,’” *Eagle Trust Fund v. U.S. Postal Serv.*, 365 F. Supp. 3d 57, 67 (D.D.C. 2019) (quoting *Leedom v. Kyne*, 358 U.S. 184, 188 (1958)), when it implemented the Postal Policy Changes before and without seeking an advisory ruling from the Postal Regulatory Commission as section 3661(b) requires, *see infra* Part II. Accordingly, Plaintiffs’ claim is amenable to *ultra vires* review.<sup>11</sup> *New York*, 2020 WL 5763775, at \*8.

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<sup>11</sup> There is no merit to Defendants’ contention that section 3661(b) is somehow ambiguous. *See* Defs.’ Mem. 24. Where, as here, the Postal Service resolves to make a “change in the nature of postal services which will generally affect service on a nationwide or substantially nationwide basis,” the statute requires that it “*shall submit* a proposal” to the Postal Regulatory Commission “prior to the effective date of such proposal.” 39 U.S.C. § 3661(b) (emphasis added). The term “shall” connotes an obligation or requirement. *Bennett v. Panama Canal Co.*, 475 F.2d 1820,

*Aid Association for Lutherans* is squarely on point. In that case, a non-profit organization challenged a Postal Service regulation broadly defining a statutory term to effect an exclusion of the non-profit from a reduced postage rate for insurance mailings. 321 F.3d at 1166. The statutory provision at issue there (39 U.S.C. § 3626(j)(1)(B)) is in the same chapter of Title 39 (Chapter 36) that governs rates and service, and thus is covered by section 3661's procedural protections. It follows from *Aid Association for Lutherans* that *ultra vires* review is available for total disregard of those statutory protections. Defendants erroneously claim that *ultra vires* review is unavailable because Plaintiffs may seek administrative review before the Postal Regulatory Commission. See Defs.' Mem. 29-30. But, again, the same would have been true in *Aid Association for Lutherans*: section 3626(j)(1)(B), as just pointed out, governs rates. And section 3662's complaint provision provides for complaints alleging violations of "this chapter," a term that includes the section at issue in *Aid Association for Lutherans*. 39 U.S.C. § 3662(a); *id.* ch. 36 (containing §§ 3626 and 3661). And yet, the D.C. Circuit in that case squarely held *ultra vires* review applied and nullified the agency's action—so it must apply here too.

More generally, D.C. Circuit authority supports the proposition that *ultra vires* review is available despite the availability of other potential avenues for relief. See, e.g., *Trudeau v. Fed. Trade Comm'n*, 456 F.3d 178, 188-90 (D.C. Cir. 2006); *Chamber of Commerce*, 74 F.3d at 1326-27. And in any case, *ultra vires* review is appropriate where, as here, plaintiffs would otherwise "have no meaningful and adequate means of vindicating [their] statutory rights." *Nat'l Air Traffic Controllers Ass'n AFL-CIO v. Fed. Serv. Impasses Panel*, 437 F.3d 1256, 1258 (D.C. Cir. 2006) (internal quotation marks omitted). As the Court has noted, forcing Plaintiffs to raise

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1828 (D.C. Cir. 1973). Whether the Postal Policy Changes meet the substantive test set forth in *Buchanan* is a merits question, not a reviewability question.

their claims administratively would, in view of the nature of the claims alleged and the impending general election, effectively “deny them meaningful review.” *New York*, 2020 WL 5763775, at \*8.

*Ultra vires* review is likewise available for Plaintiffs’ section 101 and section 403 claims. Defendants argue that section 101 and section 403 are not susceptible to judicial review under the *ultra vires* doctrine because they are merely “statements of broad policies that the Postal Service strives toward.” Defs.’ Mem. 32. That characterization of the statute is absurd and only confirms the agency has flouted Congress’s clear commands. *See* Pls.’ Mem. 25-26. Far from mere precatory statements, these provisions—incorporating the mandatory term “shall,” *see Bennett*, 475 F.2d at 1828—constitute at the very least a set of baseline service obligations with which the Postal Service must comply.<sup>12</sup> When it created the Postal Service, Congress included these directives to ensure that the agency would continue to serve an important public function by timely delivering mail without partisan intrusion. Pls.’ Mem. 24-26. Sections 101 and 403 are central mandates of the agency’s enabling statute, not mere hopes and dreams, and are enforceable under the statute’s own terms either by the Postal Regulatory Commission or by

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<sup>12</sup> In the context of employment disputes where a Postal Service employee has been fired for failing to timely deliver the mail or for unexcused absences, the courts have repeatedly recognized the statutory mandates imposed by sections 101 and 403. *U.S. Postal Serv. v. Nat’l Ass’n of Letter Carriers, AFL-CIO*, 481 U.S. 1301, 1302 (1987) (the Postal Service “operates under a statutory mandate to ensure prompt delivery of the mails”); *King v. U.S. Postal Serv.*, No. 86-cv-1975, 1988 WL 38693, at \*2 (D.D.C. Apr. 12, 1988) (“The statutorily mandated function of USPS is to transport millions and millions of pieces of mail and valuable property in extremely tight time schedules throughout the United States in the most efficient manner.”) (citing 39 U.S.C. §§ 101(a), 403(a)) (internal citations omitted); *Gaffney v. Potter*, No. 06-cv-2444, 2007 WL 4189495, at \*6 (N.D. Ohio Nov. 19, 2007) (“[T]he very mission of the USPS is to provide ‘prompt, reliable and efficient services to patrons,’ and its statutory mandate is to ‘give the highest consideration to the requirement for the most expeditious collection, transportation and delivery’ of mail.”) (quoting 39 U.S.C. §§ 101(a), (e), 403(b)(1)); *Webb v. United States*, 227 Ct. Cl. 777, 780 (1981) (the Postal Service “has a statutory mandate to provide ‘prompt, reliable and efficient services to patrons’”) (quoting 39 U.S.C. § 101(a)).

administrative complaint and judicial review. *See, e.g.*, 39 U.S.C. § 3661(c) (opinion regarding rate or service change must include a certification by each commissioner that opinion “confirms to the policies established under this title”); *id.* § 3662(a) (complaint provision); *id.* § 3652 (requiring annual assessment, with public comment, regarding whether rates and quality of service “complied with all applicable requirements of this title”).

Defendants further argue that *ultra vires* review is prohibited because sections 101 and 403 provide the agency with significant discretion over its operations. Defs.’ Mem. 31-32. That an agency may have discretion over its operations does not mean that its decisions are entirely insulated from judicial review. “Courts can defer to the exercise of administrative discretion on internal management matters, but they cannot abdicate their responsibility to insure compliance with congressional directives setting the limits on that discretion.” *Nat’l Ass’n of Postal Supervisors v. U.S. Postal Serv.*, 602 F.2d 420, 432 (D.C. Cir. 1979).<sup>13</sup> The statute at issue in *Aid Association for Lutherans*, for example, would have set the rate for non-profit insurance mailings depending on whether a policy was “primarily promoted” to certain people, and whether the coverage was “not generally otherwise commercially available”—phrasing that undoubtedly connotes discretion for the agency. 321 F.3d at 1168. And yet, in light of the statute’s text, purpose, and legislative history, the court concluded that the agency’s view was *ultra vires* because it was contrary to, and an unreasonable interpretation of, the statute’s terms. *Id.* at 1174.<sup>14</sup>

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<sup>13</sup> For like reason, Defendants’ reliance on the *Eagle Trust Fund* case is misplaced. *See* Defs.’ Mem. 32, 34. The Postal Service acts *ultra vires* where, as here, it implements its organic act in so unreasonable a manner as to constitute dereliction of its statutory obligations. *See infra* Part III; *Aid Ass’n for Lutherans*, 321 F.3d at 1178.

<sup>14</sup> As *Aid Association for Lutherans* makes clear, and contrary to Defendants’ argument, *see*

So too here: even if the Postal Service may exercise some degree of flexibility in accomplishing statutory mandates, it acts *ultra vires* where, as here, its actions flout the statute's plain terms and unreasonably apply the statutes' commands. *See infra* Part III; *Aid Ass'n for Lutherans*, 321 F.3d at 1178 (holding that the Postal Service acted without authority where, assuming statutory ambiguity, its interpretation was unreasonable in view of the language of the statute).

## II. The Postal Policy Changes violate 39 U.S.C. § 3661.

Plaintiffs' opening memorandum explained that the Postal Policy Changes violate section 3661 and should be enjoined because Defendants implemented sweeping changes in postal services with significant nationwide effects without first seeking an advisory opinion on those changes from the Postal Regulatory Commission. *See* Pls.' Mem. 20-23; Pls.' Stmt. of Facts ¶¶ 13-88, 93-115, 130-31, 155. Defendants' opposition does not respond on the merits or argue that the agency complied with section 3661; instead, Defendants contest only jurisdiction and reviewability. *See* Defs.' Mem. 17-30. Because the Court has subject-matter jurisdiction and the section 3661 claim is reviewable under the *ultra vires* doctrine for the reasons stated *supra* Parts I.B and I.C, Plaintiffs' motion for summary judgment on this claim should be granted.

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Defs.' Mem. 31, sections 101 and 403 need not be so unambiguous as to prohibit the Postal Service from exercising any discretion in implementing their mandates. The *Lutherans* court in fact rejected a similar argument, holding instead that the Postal Service acted in excess of its statutory authority by unreasonably exercising its discretion to interpret the statutory language at issue. *See Aid Ass'n for Lutherans*, 321 F.3d at 1173-74, 1178. To the extent the decision in *National Association of Postal Supervisors* appears to impose a no-ambiguity standard that is directly contrary to the binding *Lutherans* analysis, the Court should follow the D.C. Circuit's decision in *Lutherans*. *See Nat'l Ass'n of Postal Supervisors v. U.S. Postal Serv.*, No. 19-cv-2236 (RCL), 2020 WL 4039177, at \*3 (D.D.C. July 17, 2020). And needless to say, sections 101 and 403 are far more specific in their commands than the nebulous "based on appropriate data" provision at issue in *DCH*. *See DCH Reg'l Med. Ctr. v. Azar*, 925 F.3d 503, 504, 509-10 (D.C. Cir. 2019).

In opposing *ultra vires* review, Defendants do contend that the Postal Service did not commit extreme error that violates a clear, mandatory, and unambiguous statutory obligation. *See* Defs.’ Mem. 24-30. Setting aside that this is a not a statement of the standard on summary judgment—under which Plaintiffs must show that there is no genuine dispute of material fact, and Plaintiff is entitled to judgment as a matter of law, Fed. R. Civ. P. 56(a)—should the Court choose to construe Defendants’ arguments as an opposition on the merits, those arguments should be rejected.

First, Defendants argue that section 3661 only applies when the Postal Service *intends* to alter postal services, which could not have happened here because the Postal Policy Changes are not actually changes. *See* Defs.’ Mem. 25-27. But the facts as presented on summary judgment defeat this argument. The record establishes that in June and July 2020, the Postal Service implemented five operational changes to overhaul how the agency collects, processes, and delivers mail throughout the country; that those changes had both quantitative and qualitative impacts on postal services, including by causing dramatic delays in mail delivery; that those impacts were substantially nationwide in scope; and that Postal Service officials themselves acknowledged each of these points. *See* Pls.’ Mem. 21-22; Pls.’ Stmt. of Facts ¶¶ 13-115, 130-31; Pls.’ Counter-Stmt. of Facts ¶¶ 65-69, 72-75.

To be sure, Defendants dispute Plaintiffs’ statement of facts on this score, contending that the Postal Policy Changes were never made or are not changes. Defs.’ Mem. 26. But the Court already rejected Defendants’ argument that there is nothing to see here, not least because that argument is contradicted by “USPS’s own statements” acknowledging that the Postal Policy Changes in fact constitute “a significant number of changes.” *New York*, 2020 WL 5763775, at \*2-4, \*8-10. Merely reciting, for example, that late trips and extra trips were “never prohibited,”

Defs.’ Mem. 26-27, cannot defeat summary judgment because a party cannot create a triable issue of fact by misstating the record, *see SEC v. Yorkville Advisors, LLC*, 305 F. Supp. 3d 486, 516-17 (S.D.N.Y. 2018), or by citing affidavits made for litigation that contradict sworn testimony and documentary evidence, *see Galvin v. Eli Lilly & Co.*, 488 F.3d 1026, 1030 (D.C. Cir. 2007). The Court simply need not credit Defendants’ bare assertions that the operational changes amply supported by the record—and recognized by every single court to consider this question—never really happened. *Dep’t of Commerce*, 139 S. Ct. at 2575 (“Our review is deferential, but we are ‘not required to exhibit a naiveté from which ordinary citizens are free.’”) (quoting *United States v. Stanchich*, 550 F.2d 1294, 1300 (2d Cir. 1977)).

Second, Defendants argue that the Postal Service’s OIG does not believe the Postal Service was required to request an advisory opinion from the PRC before implementing these changes. Defs.’ Mem. 27-28. Although it is correct that a recent OIG Report concluded that “the Postal Service was not required by then-existing precedent to request an advisory opinion,” October 19 OIG Report 3 (ECF No. 70-1), that conclusion should carry no weight here. The OIG, of course, is not a federal court whose role is to draw legal conclusions; instead, the OIG’s mandate is to conduct independent audits and investigations, including to prevent and detect fraud, waste, and misconduct. *See* Inspector General Act of 1978, 5 U.S.C. App. § 4(a)(1) (noting duty to conduct audits and investigations); 39 U.S.C. § 202(e)(2) (noting appointment of the Inspector General by the Postal Service Board of Governors “without regard to political affiliation” and “solely on the basis of integrity and demonstrated ability in accounting, auditing, financial analysis, law, management analysis, public administration, or investigation”). In any event, the OIG’s observation about the application of section 3661 expressly reserves judgment regarding the “the cumulative effects of multiple, broadscale changes” and notes that a judicial

conclusion to the contrary would control: “At the time of this report’s publication, many of the Postal Service’s actions (including declining to seek a PRC advisory opinion) have been challenged in multiple federal jurisdictions . . . . None of these cases has yet reached a final disposition. A final decision in one or more of these cases could require a reconsideration of this issue.” October 19 OIG Report 18 n.12, 19.

More importantly, the very same OIG report contradicts *all* of the factual assertions Defendants rely on in opposing summary judgment. The OIG concluded that in June and July 2020 the Postal Service implemented all of the operational changes at issue in this litigation, and that the agency (1) “did not complete a study or analysis of the impact the changes would make on mail service prior to implementation,” but should have; (2) implemented the changes “quickly” and “communicated primarily orally, which resulted in confusion and inconsistent application across the country”; (3) executed the changes with higher “velocity and consistency” than it did with prior year initiatives; (4) “negatively impacted the quality and timeliness of mail delivery nationally” by adopting the changes, and that “mail service performance significantly dropped beginning in July 2020, directly corresponding to implementation of the operational changes and initiatives”; and (5) as a result, “[d]elayed mail in post offices, stations, and other facilities, was higher than [prior year] values and even exceeded the average of peak values.” *Id.* at 2-3, 7-8, 13-14, 24. Every single one of those conclusions—which *do* result from the OIG’s performance of its core function to investigate and audit the performance of Postal Service operations—*supports* Plaintiffs’ claim that Defendants violated section 3661 by failing to seek an advisory opinion before implementing these changes.

Summary judgment is therefore warranted on Plaintiffs’ claim that Defendants violated section 3661.



**III. The Postal Policy Changes violate the Postal Reorganization Act.**

**A. The Postal Policy Changes violate section 101.**

Defendants argue that Plaintiffs' section 101(e) claim fails to specify the changes that the agency made without any consideration for the expeditious delivery of mail. Defs.' Mem. 35. On the contrary, Plaintiffs cite specific evidence showing how the agency failed to consider the effect of each Postal Policy Change on the expeditious delivery of the mail. With regard to the reduction of mail sorting machines, the agency more than doubled its reduction rate in FY2020 and removed machines entirely rather than turning them off on a trial basis to test whether the machine would still be necessary for operations going forward. Pls.' Stmt. of Facts ¶¶ 19-28. The agency also failed to give facility managers the opportunity to weigh in on if, when, or how to reduce the sorting machines. *Id.*; *see also* Pls.' Counter-Stmt. of Facts ¶¶ 70-71. With regard to the elimination of late and extra trips, the agency did not consider the impact that its changes would have on the timely delivery of mail, did not conduct any written analyses, and did not analyze available data. Pls.' Stmt. of Facts ¶¶ 50-52, 118-24; Pls.' Counter-Stmt. of Facts ¶¶ 70-71. Nonetheless, the agency was aware that delayed mail could result. Pls.' Stmt. of Facts ¶ 65. Moreover, the Postal Service did not seek advice or guidance from the Postal Regulatory Commission on how any of the Postal Policy Changes—including the elimination of overtime, reduced morning sortation, and reduced delivery speed for election mail—could impact timely mail delivery. *Id.* ¶ 116; Pls.' Counter-Stmt. of Facts ¶¶ 70-71. These failures show that the Postal Service did not give the "highest consideration" to the expeditious delivery of mail when enacting the Postal Policy Changes—as the statute's plain language requires. 39 U.S.C. § 101(e).

The Postal Service counters that it "has always given the highest consideration to the expeditious delivery of the mail in all of its decisions," Defs.' Mem. 35, but it admits that it did

not consult with the PRC on any of the changes, including any effect they might have on expeditious mail delivery. Defs.' Counter-Stmt. of Facts ¶ 116; *see also* Pls.' Stmt. of Facts ¶¶ 117, 125. With regard to the elimination of late and extra trips, the only support the Postal Service provides is Robert Cintron's statement that he considered the issue and concluded that his guidelines on late and extra trips would result in maintaining service standards and directly improving service. Defs.' Counter-Stmt. of Facts ¶¶ 118-19. The agency provides no written analysis of these changes, and no contemporaneous documentation of these considerations. Even on *ultra vires* review of Postal Service action, such *post hoc* rationalizations—particularly when unsupported by any contemporaneous documentation—cannot support the agency's action. *N. Air Cargo*, 674 F.3d at 860 (citing *SEC v. Chenery*, 318 U.S. 80 (1943), and noting that *Chenery* was decided long before enactment of the APA).

The Postal Service also argues that the record does not support Plaintiffs' claim that the Postal Policy Changes violated section 101(a)'s mandate for prompt service by causing dramatic delays in the delivery of mail across the United States. Defs.' Mem. 36. But the facts show how each Postal Policy Change contributed to nationwide mail delays—as the agency's own OIG has now agreed. Pls.' Counter-Stmt. of Facts ¶¶ 74-75 (citing October 19 OIG Report 1, 3, 14-15). First, the removal of the mail sorting machines slowed the processing of mail. Pls.' Stmt. of Facts ¶¶ 126-27. Second, the reduction in extra and late trips has caused mail to languish in postal facilities and prevented postal employees from addressing backlogs. *Id.* ¶¶ 111, 128-29. Third, the reduced morning sortation policy built in a delay whereby mail that arrived at a facility in the morning would not be delivered until the next day at the earliest. *Id.* ¶¶ 76-83. Plaintiffs also provided evidence of the ongoing delays that have resulted from the Postal Policy Changes. *Id.* ¶¶ 65, 94-115, 130-31, 136; Pls.' Counter-Stmt. of Facts ¶¶ 74-75, 84-90.

The Postal Service admits that its targets for on-time delivery are usually around 95 percent and that on-time delivery dropped to a year-low of 81.47 percent on August 8, 2020. Defs.’ Counter-Stmt. of Facts ¶¶ 94, 98. Furthermore, it admits that Postmaster General DeJoy acknowledged that the agency’s “transformative initiative has had unintended consequences that impacted our overall service levels.” Defs.’ Counter-Stmt. of Facts ¶ 131. Nonetheless, the Postal Service argues that a variety of issues such as the COVID-19 pandemic contributed to these delays, rather than the Postal Policy Changes. *Id.* ¶ 107. But Plaintiffs’ evidence shows that changes in staffing levels due to COVID-19 cannot explain the decreases in on-time delivery. Pls.’ Stmt. of Facts ¶ 107. Accordingly, there is no genuine dispute of material fact that the Postal Service acted *ultra vires* in violation of its statutory mandate under section 101 by failing to consider whether its policies would interfere with the expeditious delivery of mail and by enacting policies that prevented prompt mail delivery.

The same is true with respect to Defendants’ violations of other subsections of section 101. Section 101(a), for example, requires the provision of “prompt, reliable, and efficient services to patrons in all areas,” and Section 101(b) notes Congress’s specific intent to secure “effective postal services.” It may be so that these phrases are not the equivalent of the Constitution’s requirement that a person be thirty-five years old to be President of the United States. Yet statutory terms have ordinary meaning. *See Bostock v. Clayton Cty.*, 140 S. Ct. 1731, 1738 (2020). And the ordinary meaning of these terms is not hard to discern: prompt means ready to act as occasion demands (or, in other words, quick),<sup>15</sup> reliable means

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<sup>15</sup> *Prompt*, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/prompt> (adjectival definition including listed synonyms) (last visited Oct. 29, 2020).

dependable,<sup>16</sup> and efficient means producing desired results without wasting effort. *See* Pls.’ Mem. at 29; *see also infra* Part III.B. Whatever the bounds of Defendants’ authority to administer the Postal Service, actions that are intended to, and do, make the Postal Service during an election *less* prompt, *less* reliable, and *less* efficient for no apparent purpose flout or unreasonably apply the commands of sections 101(a) and 101(b).

**B. The Postal Policy Changes violate section 403.**

The Postal Policy Changes violate section 403(a)’s statutory mandate to provide efficient postal services. Efficient essentially means producing desired results without wasting effort. Pls.’ Mem. at 29. Yet the removal of sorting machines increased inefficiency by forcing postal employees to waste time sorting mail by hand. Pls.’ Stmt. of Facts ¶¶ 126-27. The restrictions on late and extra trips also increased inefficiency by forcing postal employees to leave for the street before all the mail was ready for delivery and by preventing postal employees from taking steps to decrease the mail backlog. *Id.* ¶¶ 128-29. These sorts of senseless actions, taken with no apparent legitimate purpose except to *increase* time wasted and *decrease* results produced, are the hallmark of inefficiency.

The Postal Service argues that this evidence does not show that the Postal Policy Changes were inefficient because removing underutilized sorting machines and preventing late and extra trips may increase efficiency. Defs.’ Mem. 36-37. But this *post hoc* argument of counsel is belied by the *increases* in mail processing time that followed these changes, showing that efficiency *decreased*. Pls.’ Stmt. of Facts ¶¶ 108-10; Defs.’ Counter-Stmt. of Facts ¶¶ 108-10 (admitting Plaintiffs’ assertions of fact). Defendants’ argument is also contradicted by evidence

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<sup>16</sup> *Reliable*, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/reliable> (last visited Oct. 29, 2020).

that at least one facility, which lost 20 percent of its machine sorting capacity, can no longer handle the volume of mail that it is receiving. Pls.’ Stmt. of Facts ¶ 113.

The Postal Policy Changes also violate section 403(a)’s statutory mandate to provide adequate postal services. Again, “adequate” means that which is sufficient to produce a desired outcome, and, here, what must be “adequate” are the “postal services” required to be provided under the PRA. 39 U.S.C. § 403(a). One essential postal service is the expeditious delivery of election-related mail, yet the delays caused by the Postal Policy Changes threaten the timely delivery and return of ballots and impair Plaintiffs’ ability to administer the general election. Pls.’ Stmt. of Facts ¶¶ 150-78. Moreover, the Postal Service’s disavowal of its practice of delivering election mail at First Class speeds regardless of the paid class of service further undermines the adequacy of the election-related postal services. *Id.* Simply put, Defendants’ actions risk making the Postal Service *insufficient*, and thus *inadequate*, to meet an important Postal Service objective on which the voters and the States have long depended.

The Postal Service responds that it is taking steps to ensure the timely delivery of ballots. Defs.’ Mem. 37. Yet, evidence from the field refutes this claim. For example, the agency recently directed postal employees to cease the long-standing practice of providing a cautionary notice to business customers regarding political and election mail. Pls.’ Counter-Stmt. of Facts ¶ 76. In addition, postal clerks were directed by management not to prioritize election ballots received by mail. *Id.* ¶ 77. Accordingly, there is no genuine dispute of material fact that the Postal Service has acted *ultra vires* in violation of section 403 by enacting changes that cause inefficient and inadequate postal services.

#### **IV. The Postal Policy Changes violate the Elections Clause.**

Defendants’ response on Plaintiffs’ Elections Clause claim fails on many fronts. To start, this claim is not moot. It is undisputed that Plaintiffs here rely on the appropriate administration

of the mails to conduct their electoral processes for federal, state, and local elections—both this year and in future elections. The ongoing harm to these processes occasioned by Defendants’ unlawful conduct continues, with no evidence suggesting that the passage of Election Day will moot that harm. Indeed, mail-in ballots postmarked on or before Election Day will be accepted for canvassing if received by November 10 in New Jersey and New York, and by November 20 in California. *See* Cal. Elec. Code § 3020(d) (West 2020); N.J. Exec. Order No. 177, 52 N.J.R. § 1701(b) (2020); N.Y. Elec. Law § 8-412 (McKinney 2020). Moreover, it is well established that a defendant’s voluntary cessation of challenged conduct does not moot a challenge to that conduct—unless the defendant carries the “heavy burden” of “mak[ing] it absolutely clear that the allegedly wrongful behavior could not reasonably be expected to recur.” *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012, 2019 n.1 (2017) (quoting *Friends of the Earth, Inc. v. Laidlaw Envtl. Servs. (TOC), Inc.*, 528 U.S. 167, 189 (2000)). But Defendants’ actions here “fit comfortably within the established exception to mootness for disputes capable of repetition, yet evading review.” *FEC v. Wisconsin Right to Life, Inc.*, 551 U.S. 449, 462-63 (2007) (rejecting argument that occurrence of election mooted challenge when, among other things, it would have been “entirely unreasonable . . . to expect that [the complaining party] could have obtained complete judicial review of its claims in time”).

On the merits, Defendants’ response erects a straw man and then jousts with it rather than engaging in the merits of Plaintiffs’ arguments—and leaves a host of legal points undisputed. There is no dispute that the Elections Clause, unless Congress says otherwise, confers power on the States to administer congressional elections. Nor is it disputed that the States have power to administer presidential, state, and local elections. *See* Pls.’ Mem. 33-35. Nor do Defendants resist that a clear-statement rule applies whenever Congress upsets the state-federal balance, and

that Congress does in fact speak clearly when it wishes to legislate on the matters of congressional and presidential elections. *Id.* at 35. Defendants also do not appear to dispute that the Postal Service’s enabling legislation cannot be construed—under a clear-statement rule or otherwise—to confer the power to take actions that are intended to, and do, hamper state election administration. *Id.* at 36-37; *see also id.* at 42 n.17 (“USPS does not dispute that it cannot ‘make or alter’ a State election law without express Congressional authorization . . .”).

None of Defendants’ attempts to defeat this claim is persuasive. First, Defendants argue that because a gubernatorial veto “entirely negates” an election law proposed by a state legislature, it follows that the Postal Service’s actions here (which they imply do less than negate state election law) do not violate the Elections Clause. Defs.’ Mem. 40 (citing *Smiley v. Holm*, 285 U.S. 355 (1932)). But the reason a gubernatorial veto is acceptable under the Elections Clause is that the clause uses the word “legislature,” and that word as used in the clause refers to “the method which the state has prescribed for legislative enactments.” *Smiley*, 285 U.S. at 367; *see also Arizona State Legislature v. Ariz. Indep. Redistricting Comm’n*, 576 U.S. 787, 813-14 (2015) (“legislature” means “[t]he power that makes laws” in a state). So when a state constitution (like the federal constitution) includes a veto by the executive as a component of the legislative process, the exercise of that veto power is consistent with the Elections Clause and not in derogation of state power. Defendants’ reliance on *Smiley* is empty because, unlike a governor, the Postal Service is not part of any state’s lawmaking process.

Second, Defendants raise the specter of “effectively allow[ing] States to wield the Elections Clause as a means to commandeer federal agencies.” Defs.’ Mem. 40. But Plaintiffs’ claim is a narrow one: it targets Defendants’ abrupt and egregious (and unprecedented) actions, occurring in the run-up to a presidential election that depends as never before on mail-in ballots,

and intentionally designed to interfere with election administration. There is no indication *any* agency has ever done (or even *could ever do*) anything like what Defendants have done here. More generally, judicial review of the actions of a federal agency under a statute construed with certain core constitutional principles in mind is not unusual; there is no dearth of clear-statement requirements in Supreme Court precedent. *See, e.g., Coleman v. Court of Appeals of Maryland*, 566 U.S. 30, 35 (2012) (sovereign immunity). There is nothing unusual about applying those principles in an *ultra vires* action challenging federal agency action.

Third, Defendants attack Plaintiffs' argument as contending that the Elections Clause "restricts federal activity which may have an incidental impact on" state election regulations. Defs. Mem. at 39. But that is not Plaintiffs' argument. As set forth above, and in Plaintiffs' prior papers, Plaintiffs' contention (which Defendants do not appear to dispute) is that Elections Clause principles impose a clear-statement rule that governs the question whether Congress has authorized the Postal Service to take actions that are intended to, and do, interfere with state election administration. Defendants do not purport to find any such authorization in the Postal Service's enabling statute.

Defendants next contend that "USPS is not exercising any authority reserved for Congress under the Elections Clause, and so no delegation is necessary." Defs.' Mem. 41; *see also id.* at 42 n.17 ("USPS is not making or altering state election laws"). The problem for Defendants is that the Elections Clause embraces the power to fully regulate congressional elections. Pls.' Mem. 34 (quoting, *inter alia*, *Smiley*). If a State opted to establish the use of state-financed couriers to transmit to and receive from voters their registration applications and mail-in ballots for congressional elections; to build depots for those materials to be sorted, sent, and received; and to set timelines for delivery, nobody would doubt that the State would be



doing so under its Elections Clause power. That being so, if a State operating such a system opted to delay delivery of election materials, or to send fewer couriers or build fewer depots in certain portions of the State, that too would be an exercise of Elections Clause power. And of course, if Congress displaced that state system with its own set of election-material couriers, that too would be an exercise of Congress's preemptive power under the Elections Clause.

Defendants offer no reason why their conduct, pursued under the Postal Service's enabling statutes but adopted with the purpose and effect of interfering with an election, is any different;<sup>17</sup> indeed, this Court and other courts already have held that Defendants' actions threatened irreparable harm to the states' conduct of elections, and one has held that related conduct likely violated the Elections Clause.<sup>18</sup> Without Congress's "express authorization," which Defendants concede they need (*see* Defs.' Mem. 42 n.17), such conduct violates the Elections Clause.

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<sup>17</sup> Defendants point to a decision "of a federal health and safety agency to condemn a building (or otherwise ensure safe conditions) in a facility that has been selected as a polling place" (Defs.' Mem. 40-41) as a reason that a ruling for them on this claim is warranted. The power of health-and-safety condemnations is, like election regulation, largely a state and local matter. Defendants do not point to any statutory authority for their condemnation example—but federal condemnation generally would be subject to judicial-review procedures and constitutional challenge under (at minimum) the Fifth Amendment wherein the "public use" asserted for the condemnation would be subject to scrutiny—first at the Department of Justice and then in court. *See* 31 U.S.C. §§ 3113, 3114; U.S. Const. amend. V. If a federal agency sought to use that eminent-domain power to condemn a series of properties used for election administration, with the purpose and effect of interfering with the election, it is hard to see how that action would or should escape judicial scrutiny.

<sup>18</sup> *See New York*, 2020 WL 5763775, at \*12 ("[M]ail delays are impeding Plaintiffs' ability to combat the spread of a highly contagious and deadly disease and are impeding their ability to provide safe alternatives to in-person voting."); *Vote Forward*, 2020 WL 5763869, at \*10-12 (similar as to individual voters); *Washington*, 2020 WL 5568557, at \*5 (finding irreparable harm to election administration); *Pennsylvania*, 2020 WL 5763553, at \*40 ("This resonates with particular concern as to Election Mail, because the defendants have testified that Election Mail was delayed during primaries in July and August could be impacted in the future by the operational changes."); *see also Colorado v. DeJoy*, No. 20-cv-2768 (WJM), 2020 WL 5500028, at \*1 (D. Colo. Sept. 12, 2020).

Lastly, Defendants argue there is no evidence from which to conclude they acted with the improper intent to interfere with state election administration. Defs.’ Mem. 42-43. Not so. There is ample, undisputed evidence on this record from which to conclude Defendants had just such an improper intent: the timing of the Postal Policy Changes; unexplained departures from longstanding policies; procedural irregularity (indeed, total disregard of procedural guardrails); and the statements of the President himself. Pls.’ Mem. 39-40. All of this is undisputed, powerful evidence of improper motive under precedents cited by Plaintiffs. *Id.* Indeed, just today, the District of Maryland concluded that similar facts were compelling evidence that *these Defendants* engaged in viewpoint discrimination by implementing the Postal Policy Changes to target a particular political party during *this election*. *Nat’l Urban League v. DeJoy*, No. 20-cv-2391 (GLR), ECF No. 76, slip op. at 16 (D. Md. Oct. 29, 2020).<sup>19</sup> It follows from that holding—essentially, that Defendants acted with the purpose to manipulate the postal system to advantage one political party—that they also acted with the equally improper intent to interfere with state election administration itself.

#### **V. Scope of relief.**

Defendants do not dispute that Plaintiffs satisfy the well-established test for issuing permanent injunctive and declaratory relief. *See, e.g., eBay Inc. v. MercExchange, LLC*, 547

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<sup>19</sup> That court explained that “(1) DeJoy’s prolific support of the Republican party; (2) President Trump’s tweets concerning the detrimental impact of large quantities of mail-in voting on the Republican party, along with the objective data supporting that conclusion; and (3) the temporal proximity between DeJoy becoming Postmaster General and implementing policies that would tend to interfere with mail-in voting,” were “compelling circumstantial evidence that the DeJoy Policy Changes were intended to suppress mail-in voting based on hostility toward the Democratic party.” *Nat’l Urban League v. DeJoy*, No. 20-cv-2391 (GLR), ECF No. 76, slip op. at 16 (D. Md. Oct. 29, 2020).

U.S. 3848, 391 (2006) (setting forth factors); *see also* Pls.’ Mem. 42-45. Instead, Defendants contend that the relief Plaintiffs request is “too vague” to be “capable of enforcement.” Defs.’ Mem. 44.<sup>20</sup> But Plaintiffs’ proposed permanent relief declares the Postal Policy Changes unlawful and enjoins Defendants from enforcing them. Such an injunction is not incapable of enforcement. To the contrary, on October 27, the Court did just that. In several related cases, the Court granted the plaintiffs’ motions to enforce similar preliminary injunctions, ordering Defendants to take additional steps to ensure that the Postal Policy Changes are effectively rescinded, and requiring Defendants to produce additional daily data to allow the Court to monitor compliance going forward.<sup>21</sup> *See, e.g., NAACP Minute Order.*

In any event, the relief that Plaintiffs seek—that Defendants cease enforcing the unlawful policies that have delayed the mail and caused irreparable harm—is sufficiently specific. *See* Proposed Order (ECF No. 71-1). In addition, recent evidence reflects that Defendants failed in

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<sup>20</sup> Although Defendants also contend that the Court lacks jurisdiction to order relief against Defendant Trump, *see* Defs.’ Mem. 45, “[i]t is settled law that the separation-of-powers doctrine does not bar every exercise of jurisdiction over the President of the United States.” *Clinton v. Jones*, 520 U.S. 681, 705 (1997) (quoting *Nixon v. Fitzgerald*, 457 U.S. 731, 753-54 (1982)); *see also, e.g., United States v. Nixon*, 418 U.S. 683, 706 (1974) (affirming subpoena requiring President Nixon to turn over tapes of his conversations with White House aides); *Youngstown Sheet & Tube Co. v. Sawyer*, 355 U.S. 579, 582, 584, 587-88 (1952) (enjoining President Truman’s order directing the seizure of privately owned steel mills); *United States v. Burr*, 25 F. Cas. 187, 191, 196 (No. 14,694) (CC Va. 1807) (affirming issuance of subpoena requiring President Jefferson to turn over confidential correspondence). In any event, Plaintiffs seek relief that directly binds the actions of the Postal Service, not the President. *See* Proposed Order (ECF No. 71-1).

<sup>21</sup> The sole case Defendants cite for the proposition that injunctive relief is unavailable as against the agency defendants that relied upon by Defendants is not to the contrary, *Indian Educators Fed’n Local 4524 v. Kempthorne*, 590 F. Supp. 2d 15 (D.D.C. 2008), is inapt. The district court in that case issued declaratory relief and held that a preliminary injunction was premature because it was unclear how the employment program adopted by the defendants would apply to particular jobs. *Id.* at 20. Here, by contrast, injunctive relief in this case is *not* premature, but rather necessary to address the serious harms caused by the Postal Policy Changes.

meaningful ways to comply with the Court’s preliminary injunction. Defendants failed to timely and effectively rescind the Postal Policy Changes, *see supra* Part I.A.2, and mail service continues to lag far below pre-Postal Policy Change levels, *see* Pls.’ Counter-Stmt. of Facts ¶¶ 84-90.

Accordingly, given Defendants’ ongoing failure to comply with the Court’s preliminary injunction, Plaintiffs respectfully request that the Court appoint an independent monitor to oversee Defendants’ compliance with the Court’s order.<sup>22</sup> “[T]he power of federal courts to appoint special masters to monitor compliance with their remedial orders is well established.” *United States v. Yonkers Bd. of Educ.*, 29 F.3d 40, 44 (2d Cir. 1994) (collecting cases); *see* Fed. R. Civ. P. 53(a)(1)(B). Here, given Defendants’ failure to comply with the Court’s preliminary injunction, and the ongoing need to review Defendants’ data and assess compliance, “exceptional condition[s]” warrant the appointment of a special master.<sup>23</sup> Fed. R. Civ. P. 53(a)(1)(B); *see also, e.g., Local 28 of Sheet Metal Workers’ Int’l Ass’n v. EEOC*, 478 U.S. 421, 482 (1986) (appointment of administrator was appropriate under Rule 53 given prior failures to comply with court orders and “difficulties inherent in monitoring compliance” with those orders).

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<sup>22</sup> Plaintiffs did not request an independent monitor in their initial memorandum on summary judgment. This request is not waived, however, for two reasons. First, Plaintiffs’ request for a monitor is based in part on data that was unavailable when Plaintiffs filed their opening memorandum. *See, e.g.,* Pls.’ Counter-Stmt. of Facts ¶¶ 84-90. Second, because Defendants cross-moved for summary judgment and will have an opportunity to address this request in their reply, Defendants will suffer no prejudice from Plaintiffs’ request. *Zuza v. Office of High Representative*, 107 F. Supp. 3d 90, 95 n. 5 (D.D.C. 2015) (finding no prejudice or waiver where litigant had an opportunity to address new arguments raised in opposing party’s reply brief).

<sup>23</sup> Although the Court previously rejected a request to appoint a monitor in a related case, *see Richardson v. Trump*, No. 20-cv-2262 (EGS), 2020 WL 5969270, at \*16 (D.D.C. Oct. 8, 2020), recent evidence of Defendants’ ongoing failure to comply now amply justifies such an appointment.

Nor does the imminence of the election lessen the need for a monitor. As noted *supra* Parts I.B and IV, based on the ballot receipt deadlines under state law, any delays in election mail will injure Plaintiffs through mid- and late November. And mail delays more broadly injure all Plaintiffs beyond their specific injuries related to the election, including by impairing the critical and legally-mandated work of state and local agencies. *See* Pls.' Stmt. of Facts ¶¶ 4-12, 143-49; Pls.' Mem. 7, 9-12; *see also supra* Part I.A.1. An independent monitor could review ongoing data from the Postal Service, receive and investigate anonymous complaints alleging non-compliance, issue findings and non-binding guidance, and give local Postal Service managers an opportunity to rectify non-compliance with the Court's order. If warranted, a monitor could report material non-compliance to the Court. In light of Defendants' ongoing failure to restore mail service to prior levels of service, such relief would assist the Court in ensuring that Defendants comply with the Court's order in an area of grave public concern.

### CONCLUSION

Plaintiffs respectfully request that the Court grant their motion for summary judgment, deny Defendants' cross-motion for summary judgment, and enter the requested injunctive and declaratory relief.

DATED: October 29, 2020

Respectfully submitted,

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *in his official  
capacity as President of the United  
States*, et al.,

Defendants.

Case No. 20 Civ. 2340 (EGS)

**[PROPOSED] ORDER**

Upon consideration of Plaintiffs' Motion for Summary Judgment, the Memorandum and Exhibits in support thereof, any opposition, any reply thereto, and any oral argument; and upon consideration of Defendants' Cross-Motion for Summary Judgment, Plaintiffs' opposition, any reply thereto, and any oral argument, it is hereby:

ORDERED that Plaintiffs' Motion for Summary Judgment is GRANTED; and

IT IS FURTHER ORDERED that Defendants' Cross-Motion for Summary Judgment is DENIED; and

IT IS FURTHER ORDERED that the Postal Policy Changes are declared unlawful under the Postal Accountability and Enhancement Act, the Postal Reorganization Act, and the Elections Clause of the U.S. Constitution; and

IT IS FURTHER ORDERED that a Permanent Injunction is hereby entered against Defendants; and

IT IS FURTHER ORDERED that pursuant to the Order, Defendants are hereby enjoined from enforcing the Postal Policy Changes; and



IT IS FURTHER ORDERED that the Court will appoint a special master by separate order to oversee Defendants' compliance with this Order.

SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
Emmet G. Sullivan  
United States District Judge

**NAMES OF PERSONS TO BE SERVED WITH PROPOSED ORDER UPON ENTRY**

In accordance with LCvR 7(k), listed below are the names and addresses of the attorneys and parties entitled to be notified of the proposed order's entry:

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 20 Civ. 2340 (EGS)

**PLAINTIFFS’ COUNTER-STATEMENT OF DISPUTED FACTS**

Pursuant to Local Rule 7(h)(1) and Rule 13 of the Standing Order Governing Civil Cases before Judge Emmet G. Sullivan, *see* ECF No. 9, Plaintiffs respectfully submit the following counter-statement of disputed facts.

<p>1. USPS employs more than 630,000 employees; operates more than 31,000 Post Offices; utilizes more than 204,000 delivery vehicles and 8,500 pieces of automated processing equipment; and typically processes and delivers more than 450 million mailpieces to nearly 160 million delivery points in a single day. <i>See</i> Ex. 1 (USPS FY2019 Annual Report to Congress) at 2, 7.</p>	<p>Admit.</p>
<b>Mail processing and Sorting Equipment</b>	
<p>2. USPS regularly identifies mail processing and sorting equipment in approximately 289 mail processing facilities for removal and/or replacement. <i>See</i> Ex. 2 Declaration of Jason DeChambeau (“DeChambeau Dec.”) ¶ 7; Ex. 3 Declaration of Kevin Couch (“Couch Dec.”) ¶ 3; Ex. 4 Declaration of Robert Cintron (“Cintron Dec.”) ¶ 5.</p>	<p>Admit.</p>

<p>3. Based on its data analyses, USPS has been steadily reducing its letter and flat mail processing equipment for many years. Ex. 2 DeChambeau Dec. ¶ 7.</p>	<p>Deny to the extent that the cited exhibit does not support the characterization of reduction occurring “steadily” or over “many years,” as data prior to 2015 is not provided. <i>See</i> Defs.’ Ex. 2.<sup>1</sup> However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>4. USPS may reduce its letter and flat mail processing equipment for many reasons, including removing and replacing older machines with improved technology, or when such machines are no longer necessary given the significantly reduced volume of mail over the past decade, as well as even larger reduced mail volumes of approximately 20 percent due to COVID-19, that the Postal Service does not expect to return after the pandemic. Ex. 2 DeChambeau Dec. ¶¶ 7-8.</p>	<p>Admit.</p>
<p>5. Maintaining underutilized machines is inefficient and costly, requiring extra and unnecessary staffing and transportation resources. Ex. 2 DeChambeau Dec. ¶¶ 9, 11, 12.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 2. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>6. Removing unnecessary letter and flat machines frees up space for package processing, the volume of which is increasing substantially. Ex. 2 DeChambeau Dec. ¶ 18.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 2. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>7. For years, the Postal Service has reduced the number of machines on an annual basis. Ex. 2 DeChambeau Dec. ¶ 13.</p>	<p>Admit.</p>

<sup>1</sup> In the interest of clarity, Plaintiffs’ responses in the right column to Defendants’ statements of fact will cite Defendants’ exhibits as “Defs.’ Ex. \_\_\_.” Plaintiffs will cite their own exhibits as “ECF No. \_\_\_-\_\_\_,” referencing the location where those exhibits were filed on the docket of this action.

<p>8. Reducing the number of processing machines a model-driven process, where the Postal Service “determine[s] the optimum number of machines required for efficient mail processing at facilities across the nation.” Ex. 2 DeChambeau Dec. ¶¶ 15, 16.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 2. Deny and object to the extent that the cited exhibit relies upon analyses that Defendants should have but did not produce in discovery. <i>See</i> ECF No. 38-9 (Pls.’ First Request for Production of Documents to Defs.) at Request 5 (requesting production of all documents, data, and analyses “relating to service performance of mail transportation, processing, or delivery, or any other metric of service performance”).</p> <p>However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>9. USPS began Phase 6 of its reduction initiative in May 2020, based on its conclusion that the significant decline in letter and flat mail volume that had been accelerated by the COVID-19 pandemic was unlikely to significantly change, and the increase in package volume would continue. Ex. 2 DeChambeau Dec. ¶ 19.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 2. Deny and object to the extent that the cited exhibit relies upon analyses that Defendants should have but did not produce in discovery. <i>See</i> ECF No. 38-9 (Pls.’ First Request for Production of Documents to Defs.) at Request No. 5 (requesting production of all documents, data, and analyses “relating to service performance of mail transportation, processing, or delivery, or any other metric of service performance”).</p> <p>However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>10. USPS reduced a total of 711 machines in Fiscal Year 2020, more than the average of 388 machines per year over the last five years, <i>id.</i> ¶ 13, but less than the highest year, Fiscal Year 2016, where 1,120 machines were removed. Ex. 2 DeChambeau Dec. ¶ 21.</p>	<p>Admit.</p>

<p>11. Machine processing utilization at the national level ranges from 35 percent (when mail volume on a given day is low) to 65 percent (when mail volume on a given day is at its highest). Ex. 5 Barber Dec. ¶ 6.</p>	<p>Admit.</p>
<p>12. Local facilities may provide input into the machine removal process. <i>See</i> Ex. 2 DeChambeau Dec. ¶ 14</p>	<p>Admit.</p>
<p>13. On August 18, 2020, Postmaster General DeJoy ordered that all removals of equipment be suspended until after the Election. <i>See</i> Ex. 6 (Statement of Postmaster General Louis DeJoy (Aug. 18, 2020)) at 1; Ex. 2 DeChambeau Dec. ¶ 22; Ex. 3 Couch Dec. ¶¶ 13-15.</p>	<p>Deny to the extent the first cited exhibit is to be considered the Postmaster General’s “order” to employees, rather than a public announcement. <i>See</i> Defs.’ Ex. 6. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<b>Overtime and Unearned Time</b>	
<p>14. USPS’s overtime practices, where overtime is generally approved by local field managers (not Headquarters personnel), have remained unchanged since Postmaster General DeJoy took office. <i>See</i> Ex. 7 Declaration of Angela Curtis (“Curtis Dec.”) ¶¶ 12, 22-23; Ex. 8 Declaration of Joshua Colin, Ph.D. (“Colin Dec.”) ¶¶ 3-4.</p>	<p>Deny. The U.S. Postal Service’s own records show that it deployed a series of “Do It Now FY Strategies” beginning in June 2020 to reduce various types of overtime. <i>See</i> Defs.’ Ex. 23; ECF No. 59-39 (Pls.’ Ex. 39); ECF No. 59-40 (Pls.’ Ex. 40).</p>
<p>15. Postmaster General DeJoy clarified that he never banned overtime, and continues to approve of its appropriate use. <i>See, e.g.</i>, Ex. 9 (Transcript of House Oversight and Reform Committee on Postal Service Operational Changes Hearing (Aug. 24, 2020)) 14.</p>	<p>Deny to the extent that “appropriate use” is not defined. The U.S. Postal Service adopted several strategies to reduce overtime, many of which are still ongoing. <i>See</i> Defs.’ Ex. 23.</p> <p>Otherwise, admit.</p>
<p>16. The Postal Service has also continued a long-running process to reduce “unearned time,” which is the “time that an employee takes to complete those duties over and above the earned time.” Ex. 10 Curtis Tr. 53:21-23.</p>	<p>Deny to the extent that cited exhibit does not support the assertion that the U.S. Postal Service has “continued a long-running process.” <i>See</i> Defs.’ Ex. 10. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>

17. Earned time refers to the fact that, pursuant to collective bargaining agreements, the Postal Service assigns specific tasks particular times to complete – “earned” time is the time in which those employees are expected to complete the task. Ex. 10 Curtis Tr. 52:11-24.	Admit.
18. USPS had nearly one million unearned supervisor hours through 2020. Ex. 10 Curtis Tr. 68:8-11.	Admit.
19. In the summer of 2020, USPS began a process to “t[ake] a look at the data again round” the topic of reducing unearned time, and have more conversations about more efficiently scheduling employees to reduce unnecessary unearned hours. Ex. 10 Curtis Tr: 76-77.	Admit.
<b>Late and Extra Trips</b>	
20. For years, the Postal Service has sought to improve compliance with USPS’s long-established delivery schedules. <i>See</i> Ex. 4 Cintron Dec. ¶¶ 1, 11-13, 21; Ex. 11 Cintron Dep. Tr. at 22:9-23 (“So has the Postal Service ever issued any guidance about the need to adhere to transportation schedules? . . . I would say over the last two years it’s kind of been a focal point of mine in my previous job and now in this position. . . . It’s been my area of focus both for lates and extras in the network over the last couple of years.”).	Admit to the extent that this statement of fact is intended to characterize the U.S. Postal Service’s activities over the last two years.
21. When Postmaster General DeJoy took office in June 2020, Mr. Cintron discussed the initiative with the Postmaster General and other Postal executives. Ex. 4 Cintron Dec. ¶¶ 22-23.	Admit.



<p>22. Concurrent with these discussions, the USPS Office of Inspector General (OIG) published a report addressing “late deliveries . . . late dispatch, extra trips, and all the time and costs” that those issues caused. <i>See</i> Ex. 13 (Testimony of Postmaster General Louis DeJoy Before the Senate Homeland Security and Governmental Affairs Committee on USPS Operations During COVID-19 and the Elections) at 10.</p>	<p>Deny that the cited exhibit shows that the report referenced was published “[c]oncurrent with these discussions.” Rather, Postmaster General DeJoy testified that he received a report the day he was sworn in. <i>See</i> Defs.’ Ex. 13. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>23. In a June 16, 2020 report, OIG found that “generally, the Postal Service’s processing network is not operating at optimal efficiency.” Ex. 14 (USPS OIG Audit Report No. 19XG013NO000-R20, “U.S. Postal Service’s Processing Network Optimization and Service Impacts” (June 16, 2020)) at 1.</p>	<p>Admit.</p>
<p>24. The June 16, 2020 OIG report stated that “mail processing operations were not completed on time and mail missed its last scheduled transportation trip. In response, management used overtime . . . and either delayed the scheduled transportation trip or called for an extra trip.” Ex. 14 (USPS OIG Audit Report No. 19XG013NO000-R20, “U.S. Postal Service’s Processing Network Optimization and Service Impacts” (June 16, 2020)) at 2.</p>	<p>Admit.</p>
<p>25. The June 16, 2020 OIG report stated that “[a]bout 20 percent of total transportation trips (or four million trips) left mail processing facilities late.” Ex. 14 (USPS OIG Audit Report No. 19XG013NO000-R20, “U.S. Postal Service’s Processing Network Optimization and Service Impacts” (June 16, 2020)) at 2.</p>	<p>Admit.</p>
<p>26. Soon after joining USPS, Postmaster General DeJoy reemphasized the need to adhere to USPS’s existing operational plans, including transportation schedules. Ex. 4 Cintron Dec. ¶ 23.</p>	<p>Deny to the extent that the cited exhibit states “emphasized,” not “reemphasized.” <i>See</i> Defs.’ Ex. 4. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>

<p>27. A locally-prepared memorandum titled “Mandatory Stand-Up Talk: All Employees” was produced on July 10, 2020, and suggested, incorrectly, that late and extra trips were not permitted. <i>See</i> Ex. 4 Cintron Dec. ¶ 24 n.1.</p>	<p>Deny to the extent that the cited exhibit “suggested” rather than directed U.S. Postal Service employees to act accordingly. <i>See</i> Defs.’ Ex. 4. Also deny that the “Mandatory Stand-Up Talk: All Employees” did not accurately reflect Defendants’ position on late and extra trips at the time.</p> <p>However, this dispute does not create a genuine issue of fact because Defendants cannot defeat summary judgment by mischaracterizing the factual record. <i>See Fay v. Perles</i>, 59 F. Supp. 3d 128, 132 (D.D.C. 2014).</p> <p>Otherwise, admit.</p>
<p>28. Although the July 10 memorandum drew from a teleconference discussion conducted between regional and Headquarters officials, it was not created, reviewed, or approved by USPS Headquarters, and did not reflect USPS policy. <i>See</i> 15 Supplemental Declaration of Robert Cintron (“Supp. Cintron Dec.”) ¶¶ 3-4.</p>	<p>Deny. The cited exhibit cannot both “draw” from a policy discussion with U.S. Postal Service leadership and at the same time not “reflect” U.S. Postal Service policy. <i>See</i> Defs.’ Ex. 15 (“During that teleconference, members of Headquarters made statements reflected, in part, in the July 10, 2020 SUT.”).</p> <p>However, this dispute does not create a genuine issue of fact because Defendants cannot defeat summary judgment by mischaracterizing the factual record. <i>See Fay v. Perles</i>, 59 F. Supp. 3d 128, 132 (D.D.C. 2014).</p>
<p>29. “Starting on July 11, 2020, in light of some confusion in the field about the scope of USPS policy, members of Headquarters begin to issue clarifications of USPS policy, including with [Area Vice Presidents] making clear that certain statements in the July 10, 2020 [memorandum] were not accurate statements of USPS policy.” <i>See</i> Ex. 15 Supplemental Declaration of Robert Cintron (“Supp. Cintron Dec.”) ¶¶ 3-4.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 15. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>

<p>30. USPS clarified the circumstances where extra trips were permissible. <i>See</i> Ex. 15 Supplemental Declaration of Robert Cintron (“Supp. Cintron Dec.”) ¶ 4.</p>	<p>Deny to the extent “clarified” is not defined and the cited exhibit does not support the proposition that the U.S. Postal Service achieved clarity. <i>See</i> Defs.’ Ex. 15. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>31. USPS clarified that late and extra trips were not (and are not) banned, and USPS employees continue to use both today. <i>See, e.g., Pennsylvania v. DeJoy</i>, 20-cv-04096, ECF No. 76-2 (E.D. Pa. Oct. 16, 2020) (on October 13, 2020 alone, 2298 late trips and 935 extra trips were utilized by USPS employees).</p>	<p>Deny to the extent that the cited exhibit (a spreadsheet of late and extra trips) does not support the assertion that the U.S. Postal Service “clarified” that late and extra trips were not banned. <i>See</i> Defs.’ Ex. 23, at 2; <i>Pennsylvania v. DeJoy</i>, 20-cv-04096, ECF No. 76-2 (E.D. Pa. Oct. 16, 2020). However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit that U.S. Postal Service continues to use late and extra trips at a “reduced” level. <i>See</i> ECF No. 59-59 (Pls.’ Ex. 59).</p>
<p>32. In July 2020, Mr. Cintron and his team developed written guidelines (generally consistent with past practices) regarding the circumstances where the scheduling of extra transportation trips is appropriate. <i>See</i> Ex. 4 Cintron Dec. ¶ 24 &amp; Ex. 2.</p>	<p>Deny. Neither cited exhibit supports the assertion that the written guidelines were “generally consistent with past practices.” <i>See</i> Defs.’ Ex. 2; Defs.’ Ex. 4; <i>see also</i> Defs.’ Ex. 17 (“To the best of my knowledge, prior to July 14, 2020, Postal Service Headquarters had no written policy or guidelines concerning the use of late and extra trips.”).</p> <p>However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p>

<p>33. On July 14, 2020, the Cintron guidelines were distributed to area executives, advising them of USPS's renewed effort to limit unplanned extra and under-utilized trips. Ex. 4 Cintron Dec. ¶ 25.</p>	<p>Deny to the extent that the email message referenced in the cited exhibit does not refer to a "renewed effort," but states: "Our focus is to eliminate unplanned extra transportation and fully utilize our assets." See ECF No. 59-45 (Pls.' Ex. 45). However, this dispute is not material to Plaintiffs' entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>34. The Cintron guidelines did not ban or set a firm limit on late and extra trips. See Ex. 11 Cintron Dep. 63:25-65:9 ("We didn't ban extras and lates. These guidelines were purposefully put in place to make sure that we didn't have any disruption in service. Extras and lates are going to run every single day in this network. There is no way that we are going to be able to eliminate them. It's too large a network. So there is going to be a failure somewhere, and so extras and lates are put in place to mitigate."); Ex. 16 Second Declaration of Joshua Colin ("Second Colin Dec.") ¶ 17 &amp; Exs. 1, 2 (clarifying that the Cintron guidelines did not ban late/extra trips, and that USPS employees should follow updated, October 16, 2020 guidance).</p>	<p>Deny to the extent that the Cintron guidelines did not "set a firm limit on late and extra trips." The Cintron guidelines explicitly list when late or extra trips are "Acceptable" and "Not Acceptable." See ECF No. 59-46 (Pls.' Ex. 46). The Cintron guidelines also use mandatory language. See, e.g., <i>id.</i> ("Must be fully utilized"; "Must be utilized, deviation first"). However, this dispute is not material to Plaintiffs' entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>35. The purpose of the Cintron guidelines was not to minimize late or extra trips, but was to avoid "occurrences where it doesn't make any sense" to have extra or late trips, because such a trip would not actually advance the mail any faster than simply following the schedule. Ex. 11 Cintron Dep. 65:2-10.</p>	<p>Deny. See ECF No. 59-45 (Pls.' Ex. 45) ("Our focus is to eliminate unplanned extra transportation and fully utilize our assets."); <i>id.</i> ("Trips must depart on time").</p> <p>However, the purpose of the guidelines is not material to Plaintiffs' entitlement to summary judgment.</p>

<p>36. Late and extra trips may often contribute to mail delays, and thus the guidelines aimed to increase overall service performance scores. <i>See</i> Ex. 17 Third Declaration of Robert Cintron (“Third Cintron Dec.”) ¶¶ 3-4.</p>	<p>Deny. The cited exhibit does not discuss whether late or extra trips “may often contribute to mail delays.” <i>See</i> Defs.’ Ex. 17.</p> <p>Furthermore, evidence in the record shows that late and extra trips are used to <i>increase</i> service performance. <i>See</i> ECF No. 59-4 (Pls.’ Ex. 4) (“For postal workers, these are not “extra” trips or “late” trips—they are needed adjustments to adequately administer a system responsible for delivering over 470 million pieces of mail per day. They are features of the postal system, not bugs.”).</p> <p>However, the “aim” of the guidelines is not material to Plaintiffs’ entitlement to summary judgment.</p>
<p>37. The decline in service scores in mid-July 2020 was likely caused by the initial failure of other mail processing network components to adjust to the decline in unnecessary late and extra trips. <i>See</i> Ex. 17 Third Cintron Dec. ¶ 26.</p>	<p>Deny. The cited exhibit does not contain a ¶ 26. Nor does the cited exhibit discuss “other mail processing network components” or attribute the mid-July 2020 service decline to their “failure . . . to adjust.” <i>See</i> Defs.’ Ex. 17.</p> <p>Furthermore, evidence in the record shows that Cintron Guidelines’ new limitations on late and extra trips contributed to the mid-July 2020 decline in service performance. <i>See</i> ECF No. 59-23 (Pls.’ Ex. 23) (“I find that the policy limiting the number of Extra and Late trips resulted in first-class mail delays across all postal service Areas.”).</p>
<p>38. Soon after the decline in service scores in mid-July 2020, USPS “began efforts to correct the decline through focusing on meeting mail processing and delivery schedules, conducting a root cause analysis of why some mail was not timely being loaded on trucks, and identifying corrective measures to improve these issues.” Ex. 17 Third Cintron Dec. ¶ 27.</p>	<p>Deny. The cited exhibit contains neither a ¶ 27 nor the quoted language. <i>See</i> Defs.’ Ex. 17.</p> <p>However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p>

<p>39. After the <i>Washington</i> court issued the nationwide injunction, USPS issued instructions further clarifying that the “Postmaster General has not banned the use of late or extra trips; when operationally required, late or extra trips are permitted.” Ex. 12, Clarifying Operational Instructions (“Instructions”) (Sept. 21, 2020) ¶ 5.</p>	<p>Deny that the cited exhibit achieved clarity. <i>See</i> Defs.’ Ex. 12. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>40. The Instructions provide that mail should not “be left behind,” and “transportation, in the form of late or extra trips that are reasonably necessary to compete timely mail delivery, is not to be unreasonably restricted or prohibited. Ex. 12, Clarifying Operational Instructions (Sept. 21, 2020) ¶ 5.</p>	<p>Admit.</p>
<p>41. Pursuant to the Instructions, managers are authorized to use their best business judgment to meet [USPS] service commitments.” Ex. 12, Clarifying Operational Instructions (Sept. 21, 2020) ¶ 5.</p>	<p>Admit.</p>
<b>Expedited to Street Pilot Program</b>	
<p>42. The ESAS pilot program was planned before Postmaster General DeJoy took office, and it has since been suspended. <i>See</i> Ex. 8 Colin Dec. ¶ 11.</p>	<p>Deny to the extent the cited exhibit does not provide a basis to admit the asserted fact. <i>See</i> Defs.’ Ex. 8. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>43. The ESAS pilot program was scheduled for 30 days at 384 delivery units (out of approximately 18, 755 delivery units), <i>see</i> Ex. 8 Colin Dec. ¶ 7, and there is no evidence that it had any impact on service performance scores, <i>see id.</i> ¶ 11</p>	<p>Deny to the extent that the cited exhibit does not support the assertion that “there is no evidence that it had any impact on service performance.” <i>See</i> Defs.’ Ex. 8. The cited paragraph in full reads: “Postmaster General DeJoy ordered the test stopped on approximately August 21, 2020, and it will not resume, if at all, until after the November election. To my knowledge, the Postmaster General has not had any involvement in the ESAS Pilot Program test other than directing that it be stopped.” <i>Id.</i></p> <p>Otherwise, admit that the ESAS pilot program was scheduled for 30 days at 384 delivery units.</p>

<b>USPS's Handling of Election Mail</b>	
44. "Election Mail" is defined by USPS as any item mailed to or from authorized election officials that enables citizens to participate in the voting process. <i>See</i> Ex. 18 Declaration of Robert Glass ("Glass Dec.") ¶ 3.	Admit.
45. Election Mail includes mail sent by election officials to voters ( <i>e.g.</i> , voter registration materials, mail-in ballot applications, polling place notifications, blank ballots), and mail returned by voters to election officials ( <i>e.g.</i> , completed ballots, completed registration or ballot applications). Ex. 18 Glass Dec. ¶ 3.	Admit.
46. State and local election officials must choose whether to send Election Mail to voters via either First-Class Mail, which is typically delivered in two to five days, or lower-cost Marketing Mail, which is typically delivered in three to ten days. Ex. 18 Glass Dec. ¶ 4.	Admit to the extent this assertion refers to the typical delivery speeds of First-Class Mail and Marketing Mail, not Election Mail advanced ahead of all other Marketing Mail. <i>See</i> Defs.' Ex. 18.
47. Regardless of what class of mail election officials use to mail ballots out <i>to</i> voters, all ballots returned by mail to election officials <i>from</i> voters are First-Class Mail, unless a voter sends it using a premium service with faster delivery standards ( <i>i.e.</i> Priority Mail or Priority Express Mail). Ex. 19 (USPS Office of Inspector General (OIG) Audit Report No. 20-225-R-20, "Processing Readiness of Election and Political Mail During the 2020 General Elections" (Aug. 31, 2020)) at 1.	Admit.

<p>48. USPS has not altered, nor will it alter, any of its existing postal services, delivery standards, or rates applicable to the delivery of Election Mail in advance of the Election. <i>See, e.g.</i>, Ex. 13 (Testimony of Postmaster General Louis DeJoy Before the Senate Homeland Security and Governmental Affairs Committee on USPS Operations During COVID-19 and the Elections) at 18.</p>	<p>Deny. The cited exhibit does not support the assertion that the U.S. Postal Service “has not altered, nor will it alter, any of its existing postal services, delivery standards, or rates applicable to the delivery of Election Mail in advance of the Election.” <i>See</i> Defs.’ Ex. 13.</p> <p><i>See</i> ECF No. 59-4 (Pls.’ Ex. 4); ECF No. 59-22 (Pls.’ Ex. 22); ECF No. 59-29, at 107 (Pls.’ Ex. 29); ECF No. 59-35, at slide 8 (Pls.’ Ex. 35) (“Election Mail sent as Marketing Mail is not upgraded to First Class service.”); ECF No. 59-49 (Pls.’ Ex. 49); ECF No. 59-56, at 12 (Pls.’ Ex. 56).</p>
<p>49. When a mail bin identifiable as Election Mail enters the system, USPS personnel log that container at every step of processing, so that it can be easily located if necessary. Ex. 18 Glass Dec. ¶ 19.</p>	<p>Deny to the extent that no time period is specified. <i>See</i> Defs.’ Ex. 18. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>50. USPS facilities deploy end-of-day “all clears,” during which in-plant personnel use a checklist to search for all Election Mail within the facility and confirm that it is in the proper location (either already sent out for delivery or further processing, or at the front of the line for the next day). Ex. 18 Glass Dec. ¶ 19.</p>	<p>Deny to the extent that no time period is specified. <i>See</i> Defs.’ Ex. 18. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>



<p>51. USPS has never classified all Election Mail as “First-Class Mail.” Ex. 18 Glass Dec. ¶ 18.</p>	<p>Deny to the extent that “classified” is vague. <i>See</i> Defs.’ Ex. 18 (“Although there is no formal policy to this effect, it is a longstanding practice to advance Election Mail entered as Marketing Mail ahead of all other Marketing Mail. As a result of this practice, the delivery timeframes for Election Mail entered as Marketing Mail often are comparable to those of Election Mail entered as First-Class Mail.”); ECF No. 59-4 (Pls.’ Ex. 4) (“Since I began as a letter carrier in 1984, it has been standard practice to treat election mail as First Class mail with delivery times of one to three days—or better—regardless of whether it was marked as Marketing Mail.”). However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>52. Although Election Mail sent by individual voters has traditionally been (and currently is) First-Class Mail, the Postal Service generally handles Election Mail sent by election officials as Marketing Mail according to established standards for that class of mail. <i>See</i> Ex. 18 Glass Dec. ¶¶ 17-18.</p>	<p>Deny. <i>See</i> Defs.’ Ex. 18 (“Although there is no formal policy to this effect, it is a longstanding practice to advance Election Mail entered as Marketing Mail ahead of all other Marketing Mail. As a result of this practice, the delivery timeframes for Election Mail entered as Marketing Mail often are comparable to those of Election Mail entered as First-Class Mail.”); ECF No. 59-4 (Pls.’ Ex. 4) (“Since I began as a letter carrier in 1984, it has been standard practice to treat election mail as First Class mail with delivery times of one to three days—or better—regardless of whether it was marked as Marketing Mail.”).</p>
<p>53. USPS has several longstanding practices to expeditiously process and deliver of Election Mail entered as Marketing Mail, particularly ballots sent by election officials. Ex. 18 Glass Dec. ¶ 20.</p>	<p>Admit.</p>

<p>54. USPS devotes excess First-Class Mail processing capacity to Election Mail sent as Marketing Mail, and thereby advances it through the processing network ahead of other marketing mail. Ex. 18 Glass Dec. ¶ 21.</p>	<p>Admit.</p>
<p>55. Delivery timeframes for Election Mail entered as Marketing Mail are often comparable to those of Election Mail entered as First-Class Mail. Ex. 18 Glass Dec. ¶ 21.</p>	<p>Admit to the extent this statement of fact is intended to characterize delivery timeframes before the Postal Service changed its policies this summer to reduce delivery speeds for election mail.</p>
<p>56. When identifiable, USPS prioritizes placing ballots on outgoing trucks, whether sent using First-Class Mail or Marketing Mail. Ex. 18 Glass Dec. ¶ 22.</p>	<p>Admit.</p>
<p>57. USPS will continue its longstanding practices in support of mail-in voting for the Election. Ex. 18 Glass Dec. ¶ 28.</p>	<p>Deny. The statement mischaracterizes the cited exhibit, which discusses only expectations—not commitments—for the future. <i>See</i> Defs.’ Ex. 18.</p>
<p>57. USPS will continue its longstanding practices in support of mail-in voting for the Election. Ex. 18 Glass Dec. ¶ 28.</p>	<p>These expectations have not been met in certain areas. <i>See also</i> ECF No. 59-22 (Pls.’ Ex. 22) (“Additional postal management email communications to the field essentially informed the reader to instruct postal clerks to not prioritize election ballots received via mail. The directive advises the reader to not separate ballots.”).</p>
<p>58. USPS Headquarters has not issued any direction interfering with, discouraging, or prohibiting USPS personnel from taking appropriate measures to ensure the timely delivery of Election Mail, especially ballots. Ex. 18 Glass Dec. ¶¶ 1, 27.</p>	<p>Deny to the extent that cited exhibit states that declarant is not “aware” of such direction. <i>See</i> Defs.’ Ex. 18. However, this dispute is not material to Plaintiffs’ entitlement to summary judgment.</p> <p>Otherwise, admit.</p>
<p>59. On September 21, 2020, USPS issued instructions clarifying that it will prioritize Election Mail that is entered as Marketing Mail, regardless of the paid class. <i>See</i> Ex. 12, Clarifying Operational Instructions (Sept. 21, 2020) ¶ 7.</p>	<p>Admit.</p>

<p>60. USPS will use standardized log sheets to track Election Mail through processing; conduct daily “all clears” to ensure that all Election Mail is accounted for in the system and mail scheduled or “committed” to go out is processed accordingly; advance Election Mail entered as Marketing Mail ahead of all other Marketing Mail and processing it expeditiously to the extent feasible so that it is generally delivered in line with the First-Class Mail Delivery standards; expand processing windows on letter and flat sorting equipment to ensure that all Election Mail received prior to the First-Class Mail Critical Entry Time is processed the same day; and prioritize Election Mail when loading trucks. <i>See</i> Ex. 12, Clarifying Operational Instructions (Sept. 21, 2020) ¶ 7.</p>	<p>Deny to the extent not all of the U.S. Postal Service is acting accordingly. <i>See</i> ECF No. 59-22 (Pls.’ Ex. 22) (“Additional postal management email communications to the field essentially informed the reader to instruct postal clerks to not prioritize election ballots received via mail. The directive advises the reader to not separate ballots.”).</p>
<p>61. On October 20, 2020, USPS issued another guidance document—the Extraordinary Measures Memorandum—that emphasizes the additional resources USPS will commit to Election Mail. <i>See</i> Ex. 20, Extraordinary Resources Memo.</p>	<p>Admit.</p>
<p>62. USPS formed a special Command Center to address Election Mail-related issues, and reiterated that it would employ special measures, such as “expedited handling, extra deliveries, and special pickups . . . to connect blank ballots entered by election officials to voters, or completed ballots returned by voters entered close to or on Election Day to their intended destination.” Ex. 20, Extraordinary Resources Memo., at 1-2.</p>	<p>Admit.</p>
	<p><b>Plaintiffs’ additional facts as permitted by ¶ 13(d) of the Court’s Standing Order Governing Civil Cases (ECF No. 9).</b></p>

	<p>63. On October 19, 2020, the U.S. Postal Service’s Office of Inspector General (“OIG”) issued a report “to address specific concerns related to Postal Service changes put in place after the Postmaster General was sworn in on June 15, 2020.” <i>See</i> Defs.’ Ex. 23 (corrected) (ECF No. 70-1), at 1, 26 (“Our scope of this was a nationwide review of the impact of Postal Service operational changes made from June 15, 2020 to September 3, 2020 on mail delivery services.”).</p>
	<p>64. For purposes of preparing its report, the OIG interviewed U.S. Postal Service officials and postal union representatives; obtained, reviewed, and analyzed data and documents related to the changes; analyzed service performance; conducted site visits; and conducted a test mailing. Defs.’ Ex. 23, at 26.</p>
	<p>65. As set forth in the OIG’s report, in “June and July 2020, Postal Service operations executives initiated various significant cost reduction strategies on top of three initiatives the Postmaster General launched to achieve financial targets.” Defs.’ Ex. 23, at 1.</p>

	<p>66. The OIG’s report concluded that, “[a]fter his appointment, the Postmaster General implemented the following three operational and organizational changes in July and August 2020:</p> <ul style="list-style-type: none"> <li>• <i>Elimination of late and extra trips to transport mail.</i> Started July 10, 2020, this initiative was to eliminate all late and extra trips outside of regularly scheduled transportation service.</li> <li>• <i>Organization Restructure:</i> On August 7, 2020, the Postmaster General announced a reorganization of field operations and headquarters functions to align functions based on core business operations.</li> <li>• <i>Expedited Street Afternoon Sortation (ESAS):</i> This initiative began as a pilot program at 384 facilities nationwide on July 25, 2020, and was designed to eliminate excessive pre- and post-tour overtime.”</li> </ul> <p>Defs.’ Ex. 23, at 2.</p>
	<p>67. The OIG’s report concluded that “[i]n addition to these three changes, Postal Service operations executives outlined 57 initiatives” known as the “Do It Now FY Strategies” that, according to the agency’s Chief Operating Officer, constituted “‘transformational changes’ in Postal Service operations.” Defs.’ Ex. 23, at 2.</p>

	<p>68. The Do It Now FY Strategies “outlined changes from current operations in each function including mail processing, vehicle services, equipment maintenance, and post office operations (delivery and retail). They included strategies such as eliminating pre-tour overtime in city delivery operations, elimination of certain mail processing operations on Saturday, and alignment of clerk workhours to workload.” Defs.’ Ex. 23, at 10.</p>
	<p>69. Some of the Do It Now FY Strategies are ongoing, including strategies to eliminate overtime. Defs.’ Ex. 23, at 29-31; <i>see, e.g., id.</i> at 30 (listing “Eliminate Pre-Tour Overtime” as “Ongoing”).</p>
	<p>70. The OIG’s report concluded that “[n]o analysis of the service impacts of these various changes was conducted.” Defs.’ Ex. 23, at 1, 2, 8, 13, 24.</p>
	<p>71. The OIG’s report concluded that the U.S. Postal Service’s “operational initiatives should have been analyzed and evaluated ahead of deployment to fully understand the impact of implementation.” Defs.’ Ex. 23, at 24 (“[G]iven the challenges resulting from the COVID-19 pandemic, including reduced employee availability, increased package volume, and a heightened focus on voting by mail, these operational initiatives should have been analyzed and evaluated ahead of deployment to fully understand the impact of implementation.”).</p>
	<p>72. The OIG’s report concluded that the U.S. Postal Service implemented the changes “quickly” and “communicated primarily orally, which resulted in confusion and inconsistent application across the country.” Defs.’ Ex. 23, at 1–2, 8.</p>

	<p>73. The OIG’s report concluded that the U.S. Postal Service executed the changes with higher “velocity and consistency” than it did with different prior year initiatives. Defs.’ Ex. 23, at 13, 24.</p>
	<p>74. The OIG’s report concluded that the “collective results” of the U.S. Postal Service’s changes “negatively impacted the quality and timeliness of mail delivery nationally,” with “mail service performance significantly dropped beginning in July 2020, directly corresponding to implementation of the operational changes and initiatives.” Defs.’ Ex. 23, at 1, 3, 14.</p>
	<p>75. The OIG’s report concluded that the U.S. Postal Service’s changes “[d]elayed mail in post offices, stations, and other facilities,” reaching levels “higher than [prior year] values and even exceed[ing] the average of peak values.” Defs.’ Ex. 23, at 14–15.</p>
	<p>76. The Postal Service recently directed postal employees to cease the long-standing practice of providing a cautionary notice to business customers regarding political and election mail. <i>See</i> ECF No. 59-22 (Pls.’ Ex. 22) (“One communication put forth a directive to immediately cease the long-standing practice of providing a cautionary notice to business customers regarding political mail and election mail”).</p>
	<p>77. Postal clerks have been directed by Postal Service management not to prioritize election ballots received by mail. <i>See</i> ECF No. 59-22 (Pls.’ Ex. 22) (“Additional postal management email communications to the field essentially informed the reader to instruct postal clerks to not prioritize election ballots received via mail. The directive advises the reader to not separate ballots.”).</p>

	<p>78. The voter hotline maintained by the New York State Office of the Attorney General “has received over 25 complaints as of October 27 from voters who did not receive their absentee ballots in the mail in a timely manner.” ECF No. 71-4 (Pls.’ Ex. 62) (Clarke Decl. ¶ 12).</p>
	<p>79. The voter hotline maintained by the New York State Office of the Attorney General “received a complaint from a voter who reported that although they requested their absentee ballot several weeks ago, and that they received an email from the Postal Service on October 10, 2020 indicating that their ballot would be ‘arriving soon,’ they still had not received their absentee ballot on October 22, 2020.” ECF No. 71-4 (Pls.’ Ex. 62) (Clarke Decl. ¶ 13).</p>
	<p>80. The voter hotline maintained by the New York State Office of the Attorney General has “received a complaint from another voter who reported that they received a notification from the Postal Service on October 5, 2020 indicating that their ballot would be arriving soon, yet, as of October 21, 2020, they had not received their ballot. This complainant contacted the Postal Service many times regarding the status of the absentee ballots, but did not receive any further communications from the Postal Service. In their complaint, this voter reported they now planned to vote at the polls due to the Postal Service’s failure to timely deliver their absentee ballot.” ECF No. 71-4 (Pls.’ Ex. 62) (Clarke Decl. ¶ 14).</p>
	<p>81. The voter hotline maintained by the New York State Office of the Attorney General “has also received over 20 complaints as of October 20 about incredibly long lines at voting sites.” ECF No. 71-4 (Pls.’ Ex. 62) (Clarke Decl. ¶ 15).</p>



	<p>82. The voter hotline maintained by the New York State Office of the Attorney General has received complaints from multiple voters who have waited over five hours in line to vote. ECF No. 71-4 (Pls.' Ex. 62) (Clarke Decl. ¶¶ 16-17).</p>
	<p>83. The New York State Board of Elections has found that "many of the issues we saw in the June primary and anticipated for the November general election are occurring." ECF No. 71-5 (Pls.' Ex. 63) (Kellner Suppl. Decl. ¶ 7).</p>
	<p>84. Despite new guidance documents issued to U.S. Postal Service employees in September and October 2020, <i>see</i> ECF Nos. 59-60, 64-1, the number of late trips and extra trips did not return to pre-July 2020 levels, <i>see</i> ECF No. 71-7 (Pls.' Ex. 65) (Defs.' October 29, 2020 Late Trip and Extra Trip Data).</p>
	<p>85. Despite new guidance documents issued to U.S. Postal Service employees in September and October 2020, <i>see</i> ECF No. 59-60, 64-1, service performance in October has not returned to pre-July 2020 levels, <i>see</i> ECF No. 71-8 (Pls.' Ex. 66) (Defs.' October 29, 2020 Service Performance Data).</p>
	<p>86. Nationally, on-time delivery of First Class Mail declined from 88.76 percent for the week of October 3, 2020 to 83.26 percent for the week of October 17, 2020. ECF No. 71-8 (Pls.' Ex. 66) (Defs.' October 29, 2020 Service Performance Data).</p>
	<p>87. Nationally, on-time delivery of Marketing Mail declined from 91.36 percent for the week of October 3, 2020 to 88.58 percent for the week of October 17, 2020. ECF No. 71-8 (Pls.' Ex. 66) (Defs.' October 29, 2020 Service Performance Data).</p>

	88. Between October 24 and October 28, 2020, processing scores for outbound non-ballot election mail, which can include items like voter registrations, ranged between 29.88 and 95.930 percent. ECF No. 71-9 (Pls.' Ex. 67) (Def.' October 29, 2020 Ballot Delivery Data).
	89. Between October 24 and October 28, 2020, processing scores for inbound and outbound ballots ranged between 91.30 and 97.60 percent. ECF No. 71-9 (Pls.' Ex. 67) (Def.' October 29, 2020 Ballot Delivery Data).
	90. October 28, 2020, service performance scores reflected on-time delivery of 88.87% of first class mail around Sacramento, but 81.86% in Southern New Jersey and 61.57% in the Philadelphia metropolitan region. ECF No. 71-8 (Pls.' Ex. 66) (Def.' October 29, 2020 Service Performance Data).
	91. On October 27, 2020, Defendants—for the first time—formally rescinded the Cintron Guidelines via email to Postal Service management. ECF No. 71-6 (Pls.' Ex. 64) (Def.' October 28, 2020 Notice of Data).

In sum, Plaintiffs dispute in part Defendants' assertions of fact at ¶¶ 3, 5-6, 8-9, 13, 15-16, 22, 26-27, 29-31, 33-34, 39, 42-43, 49-51, 58, and 60. Plaintiffs also dispute in full Defendants' assertions of fact at ¶¶ 14, 28, 32, 35-38, 48, 52, and 57. For the reasons identified *supra* and in the accompanying memorandum of law, none of these disputes present genuine issues of material fact that require a trial or undermine Plaintiffs' entitlement to summary judgment under Rule 56.

DATED: October 29, 2020

Respectfully submitted,

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *in his official  
capacity as President of the United  
States*, et al.,

Defendants.

Case No. 20 Civ. 2340 (EGS)

DECLARATION OF MORENIKE  
FAJANA

Morenike Fajana, pursuant to penalty of perjury under 28 U.S.C. § 1746, does hereby state the following:

I am an attorney in the Office of the New York State Attorney General and counsel to Plaintiffs in this action. I submit this Declaration and index of exhibits pursuant to Rule 12(c) of the Standing Order Governing Civil Cases before Judge Emmet G. Sullivan (ECF No. 9) in support of Plaintiffs' motion for summary judgment. Attached to this Declaration are true and correct copies of the following numbered exhibits:

62. Declaration of Jessica Clarke, Chief of the Civil Rights Bureau, New York State Office of the Attorney General (Oct. 29, 2020).
63. Supplemental Declaration of Douglas A. Kellner, Commissioner and Co-Chair, New York State Board of Elections (Oct. 28, 2020).
64. Defendants' Notice of Data in Response to the Court's October 27, 2020 Order (October 28, 2020) in *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS).
65. Defendants' Data on Late Trips and Extra Trips in Response to the Court's October 27, 2020 Order (October 29, 2020) in *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS).

66. Defendants' Data on Service Performance in Response to the Court's October 27, 2020 Order (October 29, 2020) in *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS).

67. Defendants' Data on Ballot Delivery in Response to the Court's October 27, 2020 Order (October 29, 2020) in *Vote Forward v. DeJoy*, No. 20-cv-2405 (EGS).

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: October 29, 2020

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# Exhibit 62

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 20 Civ. 2340 (EGS)

DECLARATION OF JESSICA  
CLARKE

Pursuant to 28 U.S.C. § 1746(2), I, Jessica Clarke, hereby declare as follows:

**Personal Background**

1. I am over the age of eighteen and have personal knowledge of the facts stated herein. I have compiled the information in the statements set forth below either through personal knowledge, through OAG personnel who have assisted me in gathering this information, or on the basis of documents I have reviewed.

2. I am the Bureau Chief of the Civil Rights Bureau at the New York State Office of the Attorney General (OAG). I have held this position since August 8, 2019. In this role, I supervise a staff of 18 attorneys and support staff on civil rights investigations, litigation, policy initiatives, community outreach and public education.

3. The Civil Rights Bureau (the Bureau) works to promote equal justice under law and seeks to enforce the civil rights of all New Yorkers. The Bureau enforces laws that protect all New Yorkers from discrimination on the basis of race, color, national origin, sex, religion, age, marital status, sexual orientation, gender identity, status as a service member or veteran, source of income or disability. Using federal, state, and local civil rights laws, the Bureau investigates and prosecutes discrimination in a variety of areas.



4. The Bureau devotes significant resources to reduce barriers to voting. The Bureau has operated a voter hotline since November 2012. During previous elections, the Bureau, with assistance of volunteers from OAG, has fielded hundreds – and sometimes thousands – of complaints from voters across the state and worked with local election officials and others to promote access to voting for all New Yorkers.

#### **June 2020 OAG Voter Hotline**

5. In April 2020, New York State election law was amended to allow all voters to apply for absentee ballots because of the threat of contracting COVID-19.<sup>1</sup> This amendment enabled many voters to cast ballots during the June 2020 Primary Election without risking infection or contributing to the community spread of the virus.

6. With the expanded availability of absentee ballots, New York voters and New York State's election administration depended significantly on the operations of the United States Service (Postal Service). At the time, voters were required to postmark or hand-deliver an absentee ballot no later than Election Day.<sup>2</sup> A ballot postmarked by Election Day must have, in turn, been received by local BOEs within seven days of Election Day in order to be canvassed.

7. In keeping with past practice and the Bureau's commitment to protecting the right to vote, the Bureau maintained a statewide voter hotline during the June 2020 Primary Election. From June 13, 2020 to June 21, 2020, the hotline received over 600 complaints by phone and email – 65% were from voters who either requested but never received their absentee ballot in the mail, or who received their ballot in the mail very late in the process.

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<sup>1</sup> See N.Y. Elec. Law § 8-400 (McKinney)

<sup>2</sup> S.8130D, 2020 Leg. Sess. (N.Y. 2020), <https://www.nysenate.gov/legislation/bills/2019/s8130>. Election law section 8-412 previously set the deadline for the postmarking of an absentee ballot to be the day before the election itself. The one-day extension to the postmarking deadline implemented by Senate Bill S8130D sunsets on December 31, 2020.

8. Voters across the State reported to the Bureau that while they had applied for their absentee ballots before the June 16 deadline, they either never received their ballots or did not receive it in time to complete the ballot and mail it back to their local BOE by the June 23 deadline. Voters also reported that they did not receive certain absentee ballot materials, such as return and oath envelopes as well as ballots for all applicable races.

9. Based on the Bureau's analysis, voters did not receive their absentee ballots as expected for a number of reasons, including the failure of the Postal Service to meet the needs of voter demands.

#### **October – November 2020 OAG Voter Hotline**

10. Given the challenges faced by the June 2020 Primary Election, and the record number of voters who plan to vote absentee, the Bureau began preparing to administer a voter hotline well in advance of the General Election. This preparatory work included legal research, community outreach, and training a dedicated team of volunteers to respond to voter complaints.

11. The Bureau opened its voter hotline on Saturday, October 24, the first day of early voting. As of October 28, the Bureau has received 225 complaints on a variety of issues.

12. Specifically, the hotline has received over 25 complaints as of October 27 from voters who did not receive their absentee ballots in the mail in a timely manner.

13. For example, the Bureau received a complaint from a voter who reported that although they requested their absentee ballot several weeks ago, and that they received an email from the Postal Service on October 10, 2020 indicating that their ballot would be "arriving soon," they still had not received their absentee ballot on October 22, 2020.

14. The Bureau received a complaint from another voter who reported that they received a notification from the Postal Service on October 5, 2020 indicating that their ballot

would be arriving soon, yet, as of October 21, 2020, they had not received their ballot. This complainant contacted the Postal Service many times regarding the status of the absentee ballots, but did not receive any further communications from the Postal Service. In their complaint, this voter reported they now planned to vote at the polls due to the Postal Service's failure to timely deliver their absentee ballot.

15. The Bureau has also received over 20 complaints as of October 20 about incredibly long lines at voting sites.

16. For example, the Bureau received a complaint on October 27, 2020 from a voter who personally waited in line for five hours and seven minutes before casting their vote at an Early Voting site in Manhattan the same day. According to local election officials, voters began lining up around 7:20 AM, even though this site did not open until 12:00 PM. As such, incredibly long lines persisted at this site throughout the day.

17. On October 24, 2020, the Bureau received a complaint from a voter who had waited for over five hours and 22 minutes at an Early Voting site in Westchester, New York. This voter reported that they were "two blocks away from the entrance" and had not yet voted, despite this significant wait time.

18. The Bureau expects to continue to receive complaints regarding the failure of voters to timely receive their absentee ballots, as well as exceedingly long lines at polling places.

Executed on this 29th day of October, 2020.

/s/ Jessica Clarke  
Jessica Clarke

# Exhibit 63

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

Case No. 20 Civ. 2340 (EGS)

SUPPLEMENTAL DECLARATION  
OF DOUGLAS KELLNER

Pursuant to 28 U.S.C. § 1746(2), I, Douglas Kellner, hereby declare as follows:

1. I am over the age of eighteen and have personal knowledge of the facts stated herein.

2. I have served as a Commissioner and the Co-Chair of the New York State Board of Elections (“State Board”) since 2005. Before assuming my present position on the State Board, I was a commissioner of the New York City Board of Elections from 1993 until my appointment to the State Board in 2005. I also serve as the New York State representative to the Standards Board of the United States Election Assistance Commission.

3. This declaration supplements my declaration dated August 28, 2020.

4. As discussed in my prior declaration, states across the country, including New York, are seeing historical levels of absentee voting in light of the COVID-19 pandemic.

5. This was true for the June 2020 primary election, where election officials and voters, relying heavily on absentee ballots transmitted by postal mail, saw significant issues, including a breakdown of postal processes, and complaints that some voters did not receive their absentee ballots by Election Day. For any voter who did not receive their absentee ballot by Election Day, such voter would have had to vote in person in order to cast their ballot, or would

forfeit their right to the franchise. Such issues add to significant crowds and delays at certain polling sites for in-person voting. Longer wait times at polling sites is of particular concern to election officials as this increases the risk of exposure to COVID-19, thereby threatening the health and safety of voters, voting officials and the larger community.

6. These concerns among others motivated State Board officials to contact the U.S. Postal Service by letter dated August 11, 2020 to determine how the Postal Service planned to address past failures in the postmarking, delivery and collection of absentee ballots. *See* Kellner Decl. dated August 28, 2020, ¶ 25; *see also* Ex.1 to Kellner Decl. dated August 28, 2020. Despite these concerns, the State Board never received a response.

7. Now, many of the issues we saw in the June primary and anticipated for the November general election are occurring.

8. For example, through conversations with local Boards of Election, voters, voting advocates, and other stakeholders, I have received approximately two dozen complaints across eight counties from voters who requested their absentee ballots in a timely fashion, but did not receive their absentee ballots.

9. I have also received complaints from voters who are concerned about whether their ballot will be received by their Board of Election by the November 10, 2020 deadline. One such voter contacted me today, citing issues with the U.S. Postal Service. She noted that she mailed her absentee ballot on October 6, 2020. She further explained that the ballot was received by the post office on October 8, 2020. However, she stated that as of today, her ballot remains at the post office.

10. As with the June primary, any voters who do not receive their ballot by Election Day must forfeit their right to vote, or vote in person. In addition, voting in person is also an

alternative for voters who are concerned about whether their absentee ballot will not be received by their Board of Election by the November 10, 2020 deadline.

11. Given these issues, unsurprisingly, I have also received numerous complaints of crowds at polling sites and extremely long lines.

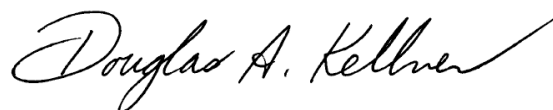
12. For example, I received a complaint on October 26, 2020 that a voter posted on social media. The voter stated that he had previously suggested that residents vote early. However, the voter noted that when he attempted to do so, he was met with a line that “snaked up, down, sideways and all the way around into the street.” The voter said he therefore “turned around and left.” He suggested that voters instead vote on Election Day within their local jurisdiction rather than during Early Voting (where voters from other parts of the County may travel to his early voting site).

13. The problem with long lines and crowds is not merely something I was made aware of through complaints, it is something I personally experienced. I attempted to vote early on Saturday, October 24, at my early voting poll site on the Upper West Side of Manhattan. However, the wait was two hours long. I tried again the next day and the day after, but each time decided to hold off after seeing daunting lines. To date, I still have not voted.

14. I have visited several early voting poll sites in Manhattan. Each of them had very long lines, usually between two and four hours, to enter the early voting poll site. I spoke with many voters to ask them why they chose to wait in a long line for early voting rather than to vote by absentee ballot. A common theme was that they did not trust that their ballot would be delivered and counted by the Board of Elections.

15. These issues continue to compound public health concerns regarding COVID-19.

Executed on this 28<sup>th</sup> day of October, 2020.  
New York, New York

A handwritten signature in black ink that reads "Douglas A. Kellner". The signature is written in a cursive style with a long, sweeping tail on the letter 'n'.

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Douglas A. Kellner



# Exhibit 64

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

VOTE FORWARD, *et al.*,

Plaintiffs,

v.

LOUIS DEJOY, *et al.*,

Defendants.

Civil Docket No. 20-cv-02405 (EGS)

**NOTICE OF DATA IN RESPONSE TO THE COURT’S OCTOBER 27, 2020 ORDER**

Pursuant to the Court’s October 27, 2020 Order granting Plaintiffs’ motion to enforce and monitor compliance,<sup>1</sup> Defendants provide the Court with “(1) updated data on the number of extra and late trips performed the preceding day, at the Nation, Area, and District level, including any available data that is specific to Election Mail, to the maximum extent feasible” and (2) “updated data on the percentage of on-time deliveries at the Nation, Area, and District level, including any available data that is specific to Election Mail to the maximum extent feasible.”

Defendants again caution that this data is unreliable and does not reflect accurate service performance reporting for the reasons stated in their opposition to Plaintiffs’ motion to enforce and the accompanying Declaration of Arslan Saleem. As explained in Defendants’ opposition, this data is not appropriate for evaluating the Postal Service’s performance throughout a week, and weekly data is significantly more useful for evaluating the Postal Service’s performance

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<sup>1</sup> Defendants maintain that Plaintiffs’ motion was without basis for the reasons set forth in Defendants’ opposition, including that (i) Defendants have complied with the Court’s orders, (ii) the data that Plaintiffs request is in any event irrelevant to assessing Defendants’ compliance, and (iii) requiring the Postal Service to produce such data would be burdensome and interfere with Postal Service operations in the days before the Election. Defendants provide the data herein subject to, and without waiving, their opposition to Plaintiffs’ request.

across multiple weeks. Accordingly, Defendants maintain that the data possesses little to no analytical value and should not be considered a reliable indicator of performance. Bearing these limitations in mind, the Postal Service provides herewith the following data.<sup>2</sup>

### **1. Extra and Late Trips**

Exhibit 1 contains the most recent reasonably available nationwide data on the number of extra and late trips for all Divisions, Surface Transfer Centers (STCs), and International Service Centers (ISCs). The data reflects extra and late trips from October 1, 2020 to October 26, 2020. Nationwide extra and late trip data is not yet available for October 27, 2020; in general, the most recent available nationwide data as of 10 AM on a particular reporting day reflects data from two days prior to the reporting day (*i.e.*, the data provided today, October 28, 2020, reflects data through October 26, 2020). As noted, the data reflects extra and late trips for Divisions, STCS, and ISCs; the Postal Service does not track this data at the Area and District Level.

### **2. On-Time Delivery Percentages**

Exhibit 2 contains daily service performance data on the National, Area, and District levels for First-Class Mail and Marketing Mail from October 24, 2020 to October 27, 2020. This data does not produce accurate, reliable information, as it is incomplete, subject to change, and overall, is not an accurate representation of the Postal Service's performance, for several reasons.

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<sup>2</sup> In addition, and pursuant to the Court's Order, on October 27, 2020, Robert Cintron sent an email to Area Vice Presidents, Managers of Operations Support, and any other USPS personnel who were previously informed about that the guidelines issued on July 14, 2020 stating, "The guidelines issued on July 14, 2020, regarding the use of late and extra trips are rescinded. USPS personnel are instructed to perform late and extra trips to the maximum extent necessary to increase on-time mail deliveries, particularly for Election Mail. To be clear, late and extra trips should be performed to the same or greater degree than they were performed prior to July 2020 when doing so would increase on-time mail deliveries. Any prior communication that is inconsistent with this instruction should be disregarded."

First, the data provides information only about the performance of mail within the Postal Service's operational network, *i.e.*, the time between its first and last processing operations, or the "processing score." It does not incorporate the "First Mile," which represents the time from acceptance of the mailpiece (*e.g.*, from a collection box or retail unit) to the first processing operation, or the "Last Mile," which tracks mailpieces from their last processing scan to delivery. "First Mile" and "Last Mile" data are not incorporated because those measurements are derived from a statistically valid system of randomly sampled mail, and the results of the sampling are not available as of the time of this filing. First and Last Mile scores are incorporated into the longer-term Service Performance scores, but this takes several days to determine, and, as such, it is not possible to include with this filing.

Second, as noted in the Declaration of Arslan Saleem, "the Postal Service has observed that individual days during the week tend to exhibit unique and differential service performance patterns that would be misleading and unhelpful when taken out of a longer-term service picture; Sundays, in particular (on which mail is not delivered), tend to distort service scores early in the following week. As such, Mondays typically have a greater volume of mail, and correspondingly lower service scores." Saleem Dec. ¶ 8. Accordingly, the data provided herein does not reflect actual service performance.

Third, the data provided here is not complete, as full information is not available at the time of this filing. As explained in Mr. Saleem's declaration, daily scores do not provide an accurate depiction of what ultimate scores for that day will be, as the scores can shift for a variety of reasons. *See id.* ¶¶ 5–6. For example, if a piece was scheduled to be delivered on Wednesday but was actually delivered on Friday, that delay would not be apparent from the Wednesday daily data and would only be incorporated into the Postal Service's data after it was

delivered on Friday. *Id.* ¶ 5. The data could also change for other reasons, including additional scans received due to a change of address. *Id.* ¶ 6. As such, this data is subject to change with each updated daily report.

Exhibit 3 contains data pertaining to three subsets of Election Mail: (1) mailpieces that are electronically identified on “entry” as Election Mail and that are also trackable using the Postal Service’s Intelligent Mail Barcode (IMB) feature; (2) Election Mail that bears service type ID (STID) codes embedded within the IMB specifically identifying the Mail as ballots outgoing to voters; and (3) Election Mail that bears STID codes that specifically identify the Mail as ballots from incoming voters. The Postal Service again cautions, however, that this data does not provide a representatively accurate measurement of Election Mail service performance because only a subset of Election Mail is sent using IMBs and ballot-specific STID codes. In addition, each of the Election Mail service figures tracks the performance of Election Mail within the Postal Service’s operational network, which is the mailpiece’s time between its first and last processing operations. As with the data provided in Exhibit 2, these service performance figures also do not incorporate the “First Mile” or “Last Mile.” Bearing these limitations in mind, the Postal Service provides, herewith, processing scores for the three subsets of Election Mail described above. The Postal Service was not able to produce Election Mail service performance data on the Area or District Levels by today’s deadline but is currently assessing its ability to do so for future filings.

The Postal Service considers all of the service performance data filed today to be commercially sensitive and not subject to public disclosure under 39 U.S.C. § 410(c). Because the service performance information is incomplete, subject to change, not representatively accurate, and potentially misleading or confusing, it would not be released under good business

practices. With respect to the daily service performance data generally, the Postal Service considers this to be commercially sensitive in that it is not consistent with its approved service performance rules and inconsistent with the methodology used in developing the data that the Postal Service discloses publicly. With respect to the Election Mail service performance data specifically, because the Postal Service is only able to measure a subset of Election Mail, the service performance scores are not representatively accurate measurements of the service performance of all Election Mail handled by the Postal Service. The data is also a subset of First-Class Mail and Marketing Mail data that is more disaggregated than is otherwise publicly shared. Nor does the Postal Service otherwise report on a combination of a subset of First-Class Mail and Marketing Mail in this manner in other contexts. As such, this information is commercially sensitive in nature and would not be disclosed under good business practices. USPS is providing the information pursuant to the Court's Order, but reserves the right to assert the confidential nature of this information in other contexts.

Dated: October 28, 2020

Respectfully submitted,

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# Exhibit 65



## Extra Trips

### Extra Trips (Network & Local - HCR & PVS):

- No. of Extra Trips by Division

Division	10/1	10/2	10/3	10/4	10/5	10/6	10/7	10/8	10/9	10/10	10/11	10/12	10/13	10/14	10/15	10/16	10/17	10/18	10/19	10/20	10/21	10/22	10/23	10/24	10/25	10/26	10/27
CHESAPEAKE	59	64	42	26	66	52	67	60	71	86	200	144	86	78	68	70	67	52	74	70	68	87	81	91	49	106	77
COASTAL SOUTHEAST	131	117	101	120	139	123	111	134	133	211	310	269	173	149	170	177	162	127	177	142	163	184	174	154	115	165	175
ISC	7	4	3	2	3	11	8	12	8	3	5	5	5	9	5	4	2	3	1	2	4	4	5	4	1		3
LAKESHORES	35	31	24	32	47	54	42	56	53	34	62	141	82	91	71	75	72	38	74	71	76	85	92	50	65	97	91
MID-ATLANTIC	20	29	38	42	45	30	28	30	39	49	198	119	66	59	70	44	37	54	61	48	50	46	60	52	66	94	68
MID-SOUTH	38	38	16	36	46	44	34	50	40	21	74	100	49	48	43	31	21	39	48	56	50	47	48	32	39	66	44
MIDWEST	30	34	29	53	44	39	49	53	47	25	121	88	68	54	32	37	33	41	45	36	61	48	43	28	43	51	44
NEW ENGLAND	30	25	24	49	46	26	34	36	42	41	49	95	62	49	39	54	63	65	71	35	46	39	40	70	64	72	42
NEW YORK METRO	22	28	20	16	21	30	31	33	33	18	46	94	80	52	41	44	44	50	40	38	41	37	43	38	29	38	35
PACIFIC NORTHWEST	35	32	50	22	48	28	36	40	45	68	174	211	75	50	48	38	45	39	64	26	24	32	36	47	46	40	24
SOUTHERN CALIFORNIA	23	28	30	21	68	35	34	29	32	35	117	247	62	36	63	53	55	33	57	44	54	38	29	33	24	35	26
SOUTHWEST	32	35	12	27	18	15	26	28	37	32	114	141	45	26	32	30	33	54	39	24	34	26	37	40	66	56	28
STC	44	54	53	39	59	47	51	46	43	48	80	49	58	67	59	36	65	43	48	58	47	59	53	58	47	47	48
WESTSHORE	20	15	21	22	31	23	22	22	17	18	44	46	24	15	9	36	28	17	40	13	19	19	21	31	18	26	21
<b>Grand Total</b>	<b>526</b>	<b>534</b>	<b>463</b>	<b>507</b>	<b>681</b>	<b>557</b>	<b>573</b>	<b>629</b>	<b>640</b>	<b>689</b>	<b>1594</b>	<b>1749</b>	<b>935</b>	<b>783</b>	<b>750</b>	<b>729</b>	<b>727</b>	<b>655</b>	<b>839</b>	<b>663</b>	<b>737</b>	<b>751</b>	<b>762</b>	<b>728</b>	<b>672</b>	<b>893</b>	<b>726</b>

## Trips On Time

### Trips On Time (Network & Local - HCR & PVS):

- No. of Late Trips by Division

Division	10/1	10/2	10/3	10/4	10/5	10/6	10/7	10/8	10/9	10/10	10/11	10/12	10/13	10/14	10/15	10/16	10/17	10/18	10/19	10/20	10/21	10/22	10/23	10/24	10/25	10/26	10/27
CHESAPEAKE	154	157	109	92	130	153	156	204	280	171	60	149	305	273	301	392	223	173	316	347	377	394	428	309	236	402	382
COASTAL SOUTHEAST	189	157	123	105	178	201	185	215	417	208	88	114	298	351	378	426	233	256	387	377	371	357	420	218	291	317	411
ISC	11	16	11	7	8	10	19	12	10	13	4	4	6	12	13	13	16	9	10	14	13	14	10	18	8	9	9
LAKESHORES	165	197	110	84	197	182	184	172	246	146	63	145	316	264	322	292	165	168	289	279	247	359	314	139	140	288	265
MID-ATLANTIC	96	111	67	54	111	130	155	135	174	87	72	67	181	205	154	174	119	102	147	153	129	147	182	120	123	156	143
MID-SOUTH	209	261	82	191	224	191	185	193	260	84	77	190	250	235	279	296	141	206	181	254	190	173	221	65	189	186	226
MIDWEST	36	35	29	27	34	36	38	24	66	23	20	27	68	77	57	48	23	39	50	44	44	54	74	35	36	58	75
NEW ENGLAND	78	77	63	80	100	106	86	109	180	94	62	96	186	147	146	188	78	116	128	101	121	141	161	78	123	136	138
NEW YORK METRO	70	74	68	41	112	121	100	100	110	91	40	51	132	127	128	107	122	61	75	109	100	126	107	90	65	102	109
PACIFIC NORTHWEST	37	50	24	19	54	56	53	31	40	21	9	25	63	78	60	76	24	33	52	58	43	34	45	12	20	40	38
SOUTHERN CALIFORNIA	58	72	27	41	70	81	79	56	106	38	12	34	86	91	80	73	46	26	70	75	76	83	60	35	29	65	52
SOUTHWEST	98	111	39	68	75	115	118	98	159	58	50	80	128	161	150	135	69	84	125	154	143	131	208	96	143	149	180
STC	128	162	134	116	96	210	206	192	214	178	112	63	137	227	236	222	203	135	111	198	202	231	214	183	145	78	230
WESTSHORE	91	117	73	65	132	130	100	135	145	85	35	49	144	127	185	163	121	118	177	145	141	215	219	125	71	158	172
<b>Grand Total</b>	<b>1420</b>	<b>1597</b>	<b>959</b>	<b>990</b>	<b>1521</b>	<b>1722</b>	<b>1664</b>	<b>1676</b>	<b>2407</b>	<b>1297</b>	<b>704</b>	<b>1094</b>	<b>2300</b>	<b>2375</b>	<b>2489</b>	<b>2605</b>	<b>1583</b>	<b>1526</b>	<b>2118</b>	<b>2308</b>	<b>2197</b>	<b>2459</b>	<b>2663</b>	<b>1523</b>	<b>1619</b>	<b>2144</b>	<b>2430</b>

# Exhibit 66

Week	Day	Area	District	First-Class	Marketing Mail
10/3/2020		Nation		88.76%	91.36%
10/10/2020		Nation		88.75%	89.54%
10/17/2020		Nation		83.26%	88.58%
10/3/2020		CAPITAL METRO		84.41%	87.41%
10/3/2020		EASTERN		86.42%	89.90%
10/3/2020		GREAT LAKES		86.59%	84.84%
10/3/2020		NORTHEAST		90.87%	92.63%
10/3/2020		PACIFIC		92.63%	96.33%
10/3/2020		SOUTHERN		88.62%	92.38%
10/3/2020		WESTERN		90.96%	93.89%
10/10/2020		CAPITAL METRO		84.27%	85.10%
10/10/2020		EASTERN		85.79%	88.18%
10/10/2020		GREAT LAKES		86.69%	84.93%
10/10/2020		NORTHEAST		90.79%	91.65%
10/10/2020		PACIFIC		93.49%	95.63%
10/10/2020		SOUTHERN		89.00%	90.48%
10/10/2020		WESTERN		90.78%	89.98%
10/17/2020		CAPITAL METRO		75.89%	77.56%
10/17/2020		EASTERN		78.23%	83.42%
10/17/2020		GREAT LAKES		82.91%	87.86%
10/17/2020		NORTHEAST		87.83%	93.71%
10/17/2020		PACIFIC		89.11%	96.06%
10/17/2020		SOUTHERN		84.10%	90.57%
10/17/2020		WESTERN		85.10%	89.47%
10/3/2020		CAPITAL METRO	ATLANTA	85.46%	78.32%
10/3/2020		CAPITAL METRO	BALTIMORE	76.64%	85.07%
10/3/2020		CAPITAL METRO	CAPITAL	77.63%	90.31%
10/3/2020		CAPITAL METRO	GREATER S CAROLINA	85.37%	92.42%
10/3/2020		CAPITAL METRO	GREENSBORO	81.97%	86.95%
10/3/2020		CAPITAL METRO	MID-CAROLINAS	88.38%	90.06%
10/3/2020		CAPITAL METRO	NORTHERN VIRGINIA	84.47%	94.78%
10/3/2020		CAPITAL METRO	RICHMOND	87.17%	90.87%
10/3/2020		EASTERN	APPALACHIAN	83.68%	94.45%
			CENTRAL		
10/3/2020		EASTERN	PENNSYLVANIA	85.33%	90.88%
10/3/2020		EASTERN	KENTUCKIANA	86.27%	95.40%
10/3/2020		EASTERN	NORTHERN OHIO	86.94%	89.54%
10/3/2020		EASTERN	OHIO VALLEY	85.68%	85.69%
			PHILADELPHIA		
10/3/2020		EASTERN	METROPO	82.01%	77.37%
10/3/2020		EASTERN	SOUTH JERSEY	83.04%	88.26%
10/3/2020		EASTERN	TENNESSEE	88.46%	92.25%
10/3/2020		EASTERN	WESTERN NEW YORK	92.42%	94.74%

		WESTERN		
10/3/2020	EASTERN	PENNSYLVANIA	91.84%	96.97%
10/3/2020	GREAT LAKES	CENTRAL ILLINOIS	83.99%	77.45%
10/3/2020	GREAT LAKES	CHICAGO	85.81%	92.10%
10/3/2020	GREAT LAKES	DETROIT	75.47%	70.53%
10/3/2020	GREAT LAKES	GATEWAY	89.60%	89.28%
10/3/2020	GREAT LAKES	GREATER INDIANA	92.11%	92.59%
10/3/2020	GREAT LAKES	GREATER MICHIGAN	89.52%	91.58%
10/3/2020	GREAT LAKES	LAKELAND	87.33%	90.75%
10/3/2020	NORTHEAST	ALBANY	91.45%	89.77%
10/3/2020	NORTHEAST	CARIBBEAN	95.31%	78.28%
10/3/2020	NORTHEAST	CONNECTICUT VALLEY	91.72%	94.58%
10/3/2020	NORTHEAST	GREATER BOSTON	92.11%	92.13%
10/3/2020	NORTHEAST	LONG ISLAND	86.64%	94.77%
10/3/2020	NORTHEAST	NEW YORK	90.20%	96.93%
		NORTHERN NEW		
10/3/2020	NORTHEAST	ENGLAND	90.15%	89.13%
		NORTHERN NEW		
10/3/2020	NORTHEAST	JERSEY	91.86%	93.36%
10/3/2020	NORTHEAST	TRIBORO	90.74%	92.67%
10/3/2020	NORTHEAST	WESTCHESTER	88.69%	91.61%
10/3/2020	PACIFIC	BAY-VALLEY	94.15%	92.92%
10/3/2020	PACIFIC	HONOLULU	90.16%	83.96%
10/3/2020	PACIFIC	LOS ANGELES	93.04%	96.54%
10/3/2020	PACIFIC	SACRAMENTO	91.88%	95.41%
10/3/2020	PACIFIC	SAN DIEGO	92.78%	97.07%
10/3/2020	PACIFIC	SAN FRANCISCO	94.20%	96.17%
10/3/2020	PACIFIC	SANTA ANA	92.07%	97.96%
10/3/2020	PACIFIC	SIERRA COASTAL	92.47%	98.11%
10/3/2020	SOUTHERN	ALABAMA	83.23%	85.58%
10/3/2020	SOUTHERN	ARKANSAS	92.32%	94.91%
10/3/2020	SOUTHERN	DALLAS	89.57%	95.29%
10/3/2020	SOUTHERN	FT WORTH	92.44%	94.84%
10/3/2020	SOUTHERN	GULF ATLANTIC	84.59%	90.09%
10/3/2020	SOUTHERN	HOUSTON	88.45%	96.89%
10/3/2020	SOUTHERN	LOUISIANA	91.52%	93.60%
10/3/2020	SOUTHERN	MISSISSIPPI	80.94%	87.18%
10/3/2020	SOUTHERN	OKLAHOMA	93.03%	95.74%
10/3/2020	SOUTHERN	RIO GRANDE	91.94%	96.75%
10/3/2020	SOUTHERN	SOUTH FLORIDA	86.16%	88.78%
10/3/2020	SOUTHERN	SUNCOAST	89.89%	90.16%
10/3/2020	WESTERN	ALASKA	93.05%	96.41%
10/3/2020	WESTERN	ARIZONA	90.54%	94.56%
10/3/2020	WESTERN	CENTRAL PLAINS	94.40%	95.08%
10/3/2020	WESTERN	COLORADO/WYOMIN	85.94%	91.15%
10/3/2020	WESTERN	DAKOTAS	93.71%	94.80%
10/3/2020	WESTERN	HAWKEYE	90.47%	92.36%

10/3/2020	WESTERN	MID-AMERICA	87.78%	86.29%
10/3/2020	WESTERN	NEVADA SIERRA	92.57%	95.59%
10/3/2020	WESTERN	NORTHLAND	87.43%	95.04%
10/3/2020	WESTERN	PORTLAND	91.85%	95.59%
10/3/2020	WESTERN	SALT LAKE CITY	93.30%	94.40%
10/3/2020	WESTERN	SEATTLE	91.04%	97.21%
10/10/2020	CAPITAL METRO	ATLANTA	86.26%	69.34%
10/10/2020	CAPITAL METRO	BALTIMORE	69.23%	78.45%
10/10/2020	CAPITAL METRO	CAPITAL	82.94%	92.42%
10/10/2020	CAPITAL METRO	GREATER S CAROLINA	83.77%	92.00%
10/10/2020	CAPITAL METRO	GREENSBORO	83.06%	85.62%
10/10/2020	CAPITAL METRO	MID-CAROLINAS	87.83%	93.45%
10/10/2020	CAPITAL METRO	NORTHERN VIRGINIA	87.72%	94.38%
10/10/2020	CAPITAL METRO	RICHMOND	88.47%	88.62%
10/10/2020	EASTERN	APPALACHIAN	89.10%	94.15%
		CENTRAL		
10/10/2020	EASTERN	PENNSYLVANIA	81.62%	92.22%
10/10/2020	EASTERN	KENTUCKIANA	88.95%	95.98%
10/10/2020	EASTERN	NORTHERN OHIO	81.28%	74.68%
10/10/2020	EASTERN	OHIO VALLEY	85.33%	89.11%
		PHILADELPHIA		
10/10/2020	EASTERN	METROPO	80.64%	75.11%
10/10/2020	EASTERN	SOUTH JERSEY	86.65%	86.21%
10/10/2020	EASTERN	TENNESSEE	90.23%	91.35%
10/10/2020	EASTERN	WESTERN NEW YORK	92.83%	94.09%
		WESTERN		
10/10/2020	EASTERN	PENNSYLVANIA	89.68%	95.59%
10/10/2020	GREAT LAKES	CENTRAL ILLINOIS	82.78%	84.55%
10/10/2020	GREAT LAKES	CHICAGO	88.89%	91.80%
10/10/2020	GREAT LAKES	DETROIT	76.67%	67.84%
10/10/2020	GREAT LAKES	GATEWAY	90.52%	91.82%
10/10/2020	GREAT LAKES	GREATER INDIANA	91.85%	91.90%
10/10/2020	GREAT LAKES	GREATER MICHIGAN	88.24%	89.61%
10/10/2020	GREAT LAKES	LAKELAND	88.22%	90.42%
10/10/2020	NORTHEAST	ALBANY	89.78%	91.22%
10/10/2020	NORTHEAST	CARIBBEAN	97.32%	88.89%
10/10/2020	NORTHEAST	CONNECTICUT VALLEY	89.65%	93.85%
10/10/2020	NORTHEAST	GREATER BOSTON	91.99%	90.89%
10/10/2020	NORTHEAST	LONG ISLAND	86.32%	94.24%
10/10/2020	NORTHEAST	NEW YORK	91.12%	96.11%
		NORTHERN NEW		
10/10/2020	NORTHEAST	ENGLAND	90.92%	88.38%
		NORTHERN NEW		
10/10/2020	NORTHEAST	JERSEY	92.01%	90.40%
10/10/2020	NORTHEAST	TRIBORO	92.50%	92.28%
10/10/2020	NORTHEAST	WESTCHESTER	89.47%	90.54%
10/10/2020	PACIFIC	BAY-VALLEY	94.55%	92.88%

10/10/2020	PACIFIC	HONOLULU	86.21%	74.01%
10/10/2020	PACIFIC	LOS ANGELES	93.09%	96.12%
10/10/2020	PACIFIC	SACRAMENTO	93.30%	93.91%
10/10/2020	PACIFIC	SAN DIEGO	93.60%	96.28%
10/10/2020	PACIFIC	SAN FRANCISCO	93.55%	96.21%
10/10/2020	PACIFIC	SANTA ANA	94.48%	97.53%
10/10/2020	PACIFIC	SIERRA COASTAL	94.15%	97.61%
10/10/2020	SOUTHERN	ALABAMA	82.49%	73.22%
10/10/2020	SOUTHERN	ARKANSAS	92.20%	94.89%
10/10/2020	SOUTHERN	DALLAS	88.44%	95.31%
10/10/2020	SOUTHERN	FT WORTH	91.71%	95.65%
10/10/2020	SOUTHERN	GULF ATLANTIC	85.65%	88.25%
10/10/2020	SOUTHERN	HOUSTON	91.83%	95.70%
10/10/2020	SOUTHERN	LOUISIANA	89.59%	92.34%
10/10/2020	SOUTHERN	MISSISSIPPI	80.36%	84.05%
10/10/2020	SOUTHERN	OKLAHOMA	94.68%	95.17%
10/10/2020	SOUTHERN	RIO GRANDE	92.93%	96.60%
10/10/2020	SOUTHERN	SOUTH FLORIDA	87.15%	82.12%
10/10/2020	SOUTHERN	SUNCOAST	89.48%	91.02%
10/10/2020	WESTERN	ALASKA	91.18%	96.55%
10/10/2020	WESTERN	ARIZONA	88.75%	80.28%
10/10/2020	WESTERN	CENTRAL PLAINS	95.15%	95.56%
10/10/2020	WESTERN	COLORADO/WYOMIN	80.84%	84.97%
10/10/2020	WESTERN	DAKOTAS	93.63%	94.39%
10/10/2020	WESTERN	HAWKEYE	90.68%	89.12%
10/10/2020	WESTERN	MID-AMERICA	87.11%	91.29%
10/10/2020	WESTERN	NEVADA SIERRA	93.14%	95.69%
10/10/2020	WESTERN	NORTHLAND	88.45%	90.90%
10/10/2020	WESTERN	PORTLAND	92.94%	95.50%
10/10/2020	WESTERN	SALT LAKE CITY	91.86%	90.86%
10/10/2020	WESTERN	SEATTLE	91.94%	96.00%
10/17/2020	CAPITAL METRO	ATLANTA	81.78%	60.34%
10/17/2020	CAPITAL METRO	BALTIMORE	56.20%	78.53%
10/17/2020	CAPITAL METRO	CAPITAL	70.53%	94.17%
10/17/2020	CAPITAL METRO	GREATER S CAROLINA	74.70%	88.30%
10/17/2020	CAPITAL METRO	GREENSBORO	65.04%	60.68%
10/17/2020	CAPITAL METRO	MID-CAROLINAS	82.93%	86.95%
10/17/2020	CAPITAL METRO	NORTHERN VIRGINIA	80.16%	93.61%
10/17/2020	CAPITAL METRO	RICHMOND	83.46%	90.53%
10/17/2020	EASTERN	APPALACHIAN	85.35%	94.89%
		CENTRAL		
10/17/2020	EASTERN	PENNSYLVANIA	70.29%	71.46%
10/17/2020	EASTERN	KENTUCKIANA	84.41%	94.22%
10/17/2020	EASTERN	NORTHERN OHIO	78.38%	69.59%
10/17/2020	EASTERN	OHIO VALLEY	78.96%	84.48%
		PHILADELPHIA		
10/17/2020	EASTERN	METROPO	61.90%	65.69%

10/17/2020	EASTERN	SOUTH JERSEY	75.40%	90.20%
10/17/2020	EASTERN	TENNESSEE	84.78%	90.82%
10/17/2020	EASTERN	WESTERN NEW YORK	88.71%	91.76%
		WESTERN		
10/17/2020	EASTERN	PENNSYLVANIA	85.41%	95.81%
10/17/2020	GREAT LAKES	CENTRAL ILLINOIS	80.34%	84.54%
10/17/2020	GREAT LAKES	CHICAGO	83.80%	89.19%
10/17/2020	GREAT LAKES	DETROIT	68.45%	77.56%
10/17/2020	GREAT LAKES	GATEWAY	85.58%	90.72%
10/17/2020	GREAT LAKES	GREATER INDIANA	90.48%	92.67%
10/17/2020	GREAT LAKES	GREATER MICHIGAN	84.47%	91.42%
10/17/2020	GREAT LAKES	LAKELAND	85.34%	94.04%
10/17/2020	NORTHEAST	ALBANY	88.50%	96.39%
10/17/2020	NORTHEAST	CARIBBEAN	94.74%	80.85%
10/17/2020	NORTHEAST	CONNECTICUT VALLEY	88.23%	95.40%
10/17/2020	NORTHEAST	GREATER BOSTON	87.55%	92.47%
10/17/2020	NORTHEAST	LONG ISLAND	86.11%	93.73%
10/17/2020	NORTHEAST	NEW YORK	86.13%	97.09%
		NORTHERN NEW		
10/17/2020	NORTHEAST	ENGLAND	87.01%	94.68%
		NORTHERN NEW		
10/17/2020	NORTHEAST	JERSEY	88.04%	92.18%
10/17/2020	NORTHEAST	TRIBORO	89.14%	92.75%
10/17/2020	NORTHEAST	WESTCHESTER	86.96%	90.93%
10/17/2020	PACIFIC	BAY-VALLEY	87.07%	95.94%
10/17/2020	PACIFIC	HONOLULU	88.61%	79.38%
10/17/2020	PACIFIC	LOS ANGELES	91.42%	96.32%
10/17/2020	PACIFIC	SACRAMENTO	89.64%	93.66%
10/17/2020	PACIFIC	SAN DIEGO	90.07%	95.34%
10/17/2020	PACIFIC	SAN FRANCISCO	87.30%	97.06%
10/17/2020	PACIFIC	SANTA ANA	88.68%	97.93%
10/17/2020	PACIFIC	SIERRA COASTAL	87.40%	97.18%
10/17/2020	SOUTHERN	ALABAMA	79.51%	84.54%
10/17/2020	SOUTHERN	ARKANSAS	89.38%	93.24%
10/17/2020	SOUTHERN	DALLAS	86.12%	93.65%
10/17/2020	SOUTHERN	FT WORTH	85.18%	88.49%
10/17/2020	SOUTHERN	GULF ATLANTIC	77.73%	88.12%
10/17/2020	SOUTHERN	HOUSTON	86.50%	94.84%
10/17/2020	SOUTHERN	LOUISIANA	87.48%	89.46%
10/17/2020	SOUTHERN	MISSISSIPPI	75.18%	87.36%
10/17/2020	SOUTHERN	OKLAHOMA	90.76%	95.39%
10/17/2020	SOUTHERN	RIO GRANDE	87.06%	91.18%
10/17/2020	SOUTHERN	SOUTH FLORIDA	80.81%	90.12%
10/17/2020	SOUTHERN	SUNCOAST	84.00%	89.64%
10/17/2020	WESTERN	ALASKA	86.22%	96.22%
10/17/2020	WESTERN	ARIZONA	83.22%	85.13%
10/17/2020	WESTERN	CENTRAL PLAINS	90.22%	93.41%



10/17/2020	WESTERN	COLORADO/WYOMIN	74.34%	71.48%
10/17/2020	WESTERN	DAKOTAS	90.16%	94.12%
10/17/2020	WESTERN	HAWKEYE	87.55%	93.98%
10/17/2020	WESTERN	MID-AMERICA	84.49%	87.38%
10/17/2020	WESTERN	NEVADA SIERRA	87.50%	96.32%
10/17/2020	WESTERN	NORTHLAND	82.61%	91.02%
10/17/2020	WESTERN	PORTLAND	84.75%	94.08%
10/17/2020	WESTERN	SALT LAKE CITY	88.84%	93.88%
10/17/2020	WESTERN	SEATTLE	82.02%	93.85%
10/3/2020	Nation		91.17%	92.75%
10/5/2020	Nation		92.00%	92.01%
10/6/2020	Nation		69.58%	93.61%
10/7/2020	Nation		85.33%	90.90%
10/8/2020	Nation		92.64%	89.46%
10/9/2020	Nation		89.03%	88.97%
10/10/2020	Nation		87.71%	89.14%
10/13/2020	Nation		90.54%	90.25%
10/14/2020	Nation		62.43%	87.88%
10/15/2020	Nation		92.28%	87.57%
10/16/2020	Nation		92.89%	93.14%
10/17/2020	Nation		85.15%	88.29%
10/19/2020	Nation		87.69%	88.14%
10/20/2020	Nation		60.13%	91.31%
10/21/2020	Nation		74.68%	88.66%
10/22/2020	Nation		88.25%	88.14%
10/23/2020	Nation		87.87%	86.60%
10/24/2020	Nation		86.15%	89.01%
10/26/2020	Nation		88.61%	87.85%
10/27/2020	Nation		64.47%	89.55%
10/28/2020	Nation		83.95%	86.66%
10/3/2020	CAPITAL METRO		88.41%	88.38%
10/3/2020	EASTERN		88.62%	89.74%
10/3/2020	GREAT LAKES		90.09%	90.37%
10/3/2020	NORTHEAST		92.21%	94.21%
10/3/2020	PACIFIC		95.05%	97.11%
10/3/2020	SOUTHERN		90.62%	93.80%
10/3/2020	WESTERN		93.11%	94.06%
10/5/2020	CAPITAL METRO		88.28%	89.86%
10/5/2020	EASTERN		90.41%	92.01%
10/5/2020	GREAT LAKES		90.73%	83.54%
10/5/2020	NORTHEAST		93.48%	92.78%
10/5/2020	PACIFIC		95.48%	96.30%
10/5/2020	SOUTHERN		91.96%	93.46%
10/5/2020	WESTERN		93.27%	93.93%
10/6/2020	CAPITAL METRO		60.07%	92.85%
10/6/2020	EASTERN		62.46%	92.84%

10/6/2020 GREAT LAKES	60.72%	87.88%
10/6/2020 NORTHEAST	73.84%	94.88%
10/6/2020 PACIFIC	79.54%	96.50%
10/6/2020 SOUTHERN	70.22%	94.52%
10/6/2020 WESTERN	75.80%	94.88%
10/7/2020 CAPITAL METRO	76.99%	84.59%
10/7/2020 EASTERN	82.59%	91.29%
10/7/2020 GREAT LAKES	80.81%	82.75%
10/7/2020 NORTHEAST	90.01%	92.42%
10/7/2020 PACIFIC	89.63%	96.58%
10/7/2020 SOUTHERN	84.95%	91.49%
10/7/2020 WESTERN	89.12%	94.39%
10/8/2020 CAPITAL METRO	88.68%	83.66%
10/8/2020 EASTERN	91.21%	84.38%
10/8/2020 GREAT LAKES	90.31%	81.25%
10/8/2020 NORTHEAST	94.44%	90.51%
10/8/2020 PACIFIC	94.71%	96.75%
10/8/2020 SOUTHERN	92.91%	90.92%
10/8/2020 WESTERN	94.73%	94.19%
10/9/2020 CAPITAL METRO	86.25%	84.03%
10/9/2020 EASTERN	86.56%	86.97%
10/9/2020 GREAT LAKES	88.14%	83.50%
10/9/2020 NORTHEAST	89.81%	90.14%
10/9/2020 PACIFIC	92.51%	94.65%
10/9/2020 SOUTHERN	88.80%	89.80%
10/9/2020 WESTERN	90.83%	91.41%
10/10/2020 CAPITAL METRO	82.85%	85.65%
10/10/2020 EASTERN	84.74%	88.57%
10/10/2020 GREAT LAKES	84.84%	83.11%
10/10/2020 NORTHEAST	90.13%	89.73%
10/10/2020 PACIFIC	92.78%	94.32%
10/10/2020 SOUTHERN	87.86%	90.07%
10/10/2020 WESTERN	90.12%	90.77%
10/13/2020 CAPITAL METRO	87.42%	87.08%
10/13/2020 EASTERN	88.44%	89.57%
10/13/2020 GREAT LAKES	89.61%	84.25%
10/13/2020 NORTHEAST	91.47%	91.22%
10/13/2020 PACIFIC	94.52%	95.84%
10/13/2020 SOUTHERN	90.37%	91.52%
10/13/2020 WESTERN	91.87%	91.80%
10/14/2020 CAPITAL METRO	48.73%	84.85%
10/14/2020 EASTERN	56.03%	87.17%
10/14/2020 GREAT LAKES	56.51%	83.02%
10/14/2020 NORTHEAST	68.46%	93.51%
10/14/2020 PACIFIC	78.64%	95.95%
10/14/2020 SOUTHERN	62.83%	85.72%
10/14/2020 WESTERN	66.73%	85.37%

10/15/2020 CAPITAL METRO	86.45%	79.92%
10/15/2020 EASTERN	90.49%	83.24%
10/15/2020 GREAT LAKES	90.54%	85.09%
10/15/2020 NORTHEAST	94.59%	89.95%
10/15/2020 PACIFIC	94.96%	94.77%
10/15/2020 SOUTHERN	92.60%	90.78%
10/15/2020 WESTERN	94.72%	87.46%
10/16/2020 CAPITAL METRO	89.64%	86.25%
10/16/2020 EASTERN	89.01%	91.88%
10/16/2020 GREAT LAKES	91.69%	90.79%
10/16/2020 NORTHEAST	93.54%	93.48%
10/16/2020 PACIFIC	96.22%	96.92%
10/16/2020 SOUTHERN	93.92%	95.09%
10/16/2020 WESTERN	95.12%	94.45%
10/17/2020 CAPITAL METRO	77.55%	80.20%
10/17/2020 EASTERN	81.08%	84.32%
10/17/2020 GREAT LAKES	85.54%	87.54%
10/17/2020 NORTHEAST	87.79%	92.65%
10/17/2020 PACIFIC	91.67%	94.97%
10/17/2020 SOUTHERN	84.82%	90.68%
10/17/2020 WESTERN	86.94%	87.40%
10/19/2020 CAPITAL METRO	82.47%	75.02%
10/19/2020 EASTERN	82.74%	82.70%
10/19/2020 GREAT LAKES	88.46%	85.89%
10/19/2020 NORTHEAST	90.38%	92.76%
10/19/2020 PACIFIC	93.72%	95.75%
10/19/2020 SOUTHERN	89.12%	93.07%
10/19/2020 WESTERN	87.49%	87.24%
10/20/2020 CAPITAL METRO	51.38%	84.84%
10/20/2020 EASTERN	49.54%	89.73%
10/20/2020 GREAT LAKES	55.58%	90.24%
10/20/2020 NORTHEAST	71.45%	95.39%
10/20/2020 PACIFIC	68.91%	96.17%
10/20/2020 SOUTHERN	63.41%	92.70%
10/20/2020 WESTERN	63.71%	88.66%
10/21/2020 CAPITAL METRO	62.62%	77.62%
10/21/2020 EASTERN	71.10%	82.64%
10/21/2020 GREAT LAKES	71.52%	88.10%
10/21/2020 NORTHEAST	83.44%	93.87%
10/21/2020 PACIFIC	80.73%	96.68%
10/21/2020 SOUTHERN	73.46%	90.79%
10/21/2020 WESTERN	79.78%	89.89%
10/22/2020 CAPITAL METRO	82.34%	72.04%
10/22/2020 EASTERN	84.09%	82.80%
10/22/2020 GREAT LAKES	87.60%	88.33%
10/22/2020 NORTHEAST	91.21%	93.20%
10/22/2020 PACIFIC	91.44%	96.91%

10/22/2020 SOUTHERN		89.38%	90.13%
10/22/2020 WESTERN		90.85%	91.50%
10/23/2020 CAPITAL METRO		80.55%	76.07%
10/23/2020 EASTERN		83.93%	77.84%
10/23/2020 GREAT LAKES		88.66%	86.82%
10/23/2020 NORTHEAST		91.06%	93.54%
10/23/2020 PACIFIC		92.14%	95.47%
10/23/2020 SOUTHERN		88.67%	85.35%
10/23/2020 WESTERN		90.16%	92.12%
10/24/2020 Capital Metro		80.02%	79.54%
10/24/2020 Eastern		80.51%	83.95%
10/24/2020 Great Lakes		86.00%	89.86%
10/24/2020 Northeast		89.87%	92.90%
10/24/2020 Pacific		92.42%	96.13%
10/24/2020 Southern		87.83%	88.32%
10/24/2020 Western		86.85%	92.38%
10/26/2020 Capital Metro		82.42%	74.64%
10/26/2020 Eastern		82.69%	79.97%
10/26/2020 Great Lakes		88.49%	89.80%
10/26/2020 Northeast		92.55%	92.74%
10/26/2020 Pacific		94.38%	96.28%
10/26/2020 Southern		89.96%	91.22%
10/26/2020 Western		90.31%	92.15%
10/27/2020 Capital Metro		56.10%	78.91%
10/27/2020 Eastern		57.67%	85.18%
10/27/2020 Great Lakes		61.19%	88.64%
10/27/2020 Northeast		73.71%	93.01%
10/27/2020 Pacific		73.24%	96.36%
10/27/2020 Southern		68.93%	92.02%
10/27/2020 Western		65.47%	91.62%
10/28/2020 Capital Metro		76.27%	73.18%
10/28/2020 Eastern		79.97%	80.88%
10/28/2020 Great Lakes		80.32%	85.72%
10/28/2020 Northeast		88.96%	92.75%
10/28/2020 Pacific		90.19%	95.68%
10/28/2020 Southern		85.98%	90.63%
10/28/2020 Western		86.13%	88.14%
10/3/2020 CAPITAL METRO	ATLANTA	89.35%	74.06%
10/3/2020 CAPITAL METRO	BALTIMORE	83.74%	93.43%
10/3/2020 CAPITAL METRO	CAPITAL	80.51%	91.53%
10/3/2020 CAPITAL METRO	GREATER S CAROLINA	88.56%	93.61%
10/3/2020 CAPITAL METRO	GREENSBORO	87.33%	88.64%
10/3/2020 CAPITAL METRO	MID-CAROLINAS	92.27%	91.55%
10/3/2020 CAPITAL METRO	NORTHERN VIRGINIA	88.69%	94.96%
10/3/2020 CAPITAL METRO	RICHMOND	88.89%	90.92%
10/3/2020 EASTERN	APPALACHIAN	88.03%	96.37%

	CENTRAL		
10/3/2020 EASTERN	PENNSYLVANIA	87.83%	92.19%
10/3/2020 EASTERN	KENTUCKIANA	86.86%	95.83%
10/3/2020 EASTERN	NORTHERN OHIO	91.20%	92.26%
10/3/2020 EASTERN	OHIO VALLEY	87.76%	86.03%
	PHILADELPHIA		
10/3/2020 EASTERN	METROPO	79.96%	74.00%
10/3/2020 EASTERN	SOUTH JERSEY	88.08%	84.43%
10/3/2020 EASTERN	TENNESSEE	89.30%	92.18%
10/3/2020 EASTERN	WESTERN NEW YORK	94.95%	92.13%
	WESTERN		
10/3/2020 EASTERN	PENNSYLVANIA	94.24%	97.03%
10/3/2020 GREAT LAKES	CENTRAL ILLINOIS	88.81%	89.55%
10/3/2020 GREAT LAKES	CHICAGO	85.01%	92.59%
10/3/2020 GREAT LAKES	DETROIT	83.20%	78.83%
10/3/2020 GREAT LAKES	GATEWAY	92.14%	93.07%
10/3/2020 GREAT LAKES	GREATER INDIANA	93.83%	92.35%
10/3/2020 GREAT LAKES	GREATER MICHIGAN	92.99%	94.07%
10/3/2020 GREAT LAKES	LAKELAND	89.61%	95.01%
10/3/2020 NORTHEAST	ALBANY	93.48%	95.16%
10/3/2020 NORTHEAST	CARIBBEAN	95.90%	79.76%
10/3/2020 NORTHEAST	CONNECTICUT VALLEY	89.18%	95.25%
10/3/2020 NORTHEAST	GREATER BOSTON	91.94%	92.33%
10/3/2020 NORTHEAST	LONG ISLAND	90.79%	95.65%
10/3/2020 NORTHEAST	NEW YORK	93.28%	96.94%
	NORTHERN NEW		
10/3/2020 NORTHEAST	ENGLAND	92.77%	95.40%
	NORTHERN NEW		
10/3/2020 NORTHEAST	JERSEY	93.12%	94.04%
10/3/2020 NORTHEAST	TRIBORO	93.50%	95.73%
10/3/2020 NORTHEAST	WESTCHESTER	93.30%	88.82%
10/3/2020 PACIFIC	BAY-VALLEY	95.40%	95.93%
10/3/2020 PACIFIC	HONOLULU	91.63%	80.91%
10/3/2020 PACIFIC	LOS ANGELES	95.63%	96.95%
10/3/2020 PACIFIC	SACRAMENTO	94.23%	96.68%
10/3/2020 PACIFIC	SAN DIEGO	95.36%	96.62%
10/3/2020 PACIFIC	SAN FRANCISCO	96.23%	98.12%
10/3/2020 PACIFIC	SANTA ANA	94.80%	98.18%
10/3/2020 PACIFIC	SIERRA COASTAL	95.46%	98.02%
10/3/2020 SOUTHERN	ALABAMA	87.93%	78.84%
10/3/2020 SOUTHERN	ARKANSAS	94.10%	94.76%
10/3/2020 SOUTHERN	DALLAS	92.67%	95.46%
10/3/2020 SOUTHERN	FT WORTH	92.94%	95.14%
10/3/2020 SOUTHERN	GULF ATLANTIC	88.52%	93.43%
10/3/2020 SOUTHERN	HOUSTON	88.86%	97.08%
10/3/2020 SOUTHERN	LOUISIANA	94.00%	94.68%
10/3/2020 SOUTHERN	MISSISSIPPI	81.01%	84.89%

10/3/2020 SOUTHERN	OKLAHOMA	94.31%	94.64%
10/3/2020 SOUTHERN	RIO GRANDE	92.64%	96.92%
10/3/2020 SOUTHERN	SOUTH FLORIDA	86.65%	93.92%
10/3/2020 SOUTHERN	SUNCOAST	91.92%	92.19%
10/3/2020 WESTERN	ALASKA	92.94%	98.63%
10/3/2020 WESTERN	ARIZONA	92.56%	92.78%
10/3/2020 WESTERN	CENTRAL PLAINS	96.92%	95.02%
10/3/2020 WESTERN	COLORADO/WYOMIN	88.05%	88.76%
10/3/2020 WESTERN	DAKOTAS	95.60%	95.98%
10/3/2020 WESTERN	HAWKEYE	94.03%	93.27%
10/3/2020 WESTERN	MID-AMERICA	92.29%	90.71%
10/3/2020 WESTERN	NEVADA SIERRA	95.98%	96.82%
10/3/2020 WESTERN	NORTHLAND	89.30%	94.17%
10/3/2020 WESTERN	PORTLAND	93.20%	96.02%
10/3/2020 WESTERN	SALT LAKE CITY	93.17%	96.10%
10/3/2020 WESTERN	SEATTLE	92.21%	97.83%
10/5/2020 CAPITAL METRO	ATLANTA	88.03%	86.42%
10/5/2020 CAPITAL METRO	BALTIMORE	84.84%	80.47%
10/5/2020 CAPITAL METRO	CAPITAL	84.13%	90.30%
10/5/2020 CAPITAL METRO	GREATER S CAROLINA	89.90%	89.42%
10/5/2020 CAPITAL METRO	GREENSBORO	86.86%	93.64%
10/5/2020 CAPITAL METRO	MID-CAROLINAS	90.32%	90.38%
10/5/2020 CAPITAL METRO	NORTHERN VIRGINIA	87.50%	96.14%
10/5/2020 CAPITAL METRO	RICHMOND	90.46%	91.70%
10/5/2020 EASTERN	APPALACHIAN	88.89%	95.23%
	CENTRAL		
10/5/2020 EASTERN	PENNSYLVANIA	91.30%	94.47%
10/5/2020 EASTERN	KENTUCKIANA	90.95%	94.04%
10/5/2020 EASTERN	NORTHERN OHIO	91.24%	93.33%
10/5/2020 EASTERN	OHIO VALLEY	89.97%	92.47%
	PHILADELPHIA		
10/5/2020 EASTERN	METROPO	86.16%	82.56%
10/5/2020 EASTERN	SOUTH JERSEY	88.89%	92.15%
10/5/2020 EASTERN	TENNESSEE	89.54%	89.14%
10/5/2020 EASTERN	WESTERN NEW YORK	93.43%	92.65%
	WESTERN		
10/5/2020 EASTERN	PENNSYLVANIA	93.45%	97.06%
10/5/2020 GREAT LAKES	CENTRAL ILLINOIS	88.45%	69.02%
10/5/2020 GREAT LAKES	CHICAGO	91.02%	94.53%
10/5/2020 GREAT LAKES	DETROIT	84.08%	66.10%
10/5/2020 GREAT LAKES	GATEWAY	92.85%	93.19%
10/5/2020 GREAT LAKES	GREATER INDIANA	93.73%	95.04%
10/5/2020 GREAT LAKES	GREATER MICHIGAN	92.49%	90.82%
10/5/2020 GREAT LAKES	LAKELAND	91.72%	92.99%
10/5/2020 NORTHEAST	ALBANY	93.96%	96.98%
10/5/2020 NORTHEAST	CARIBBEAN	90.32%	73.73%
10/5/2020 NORTHEAST	CONNECTICUT VALLEY	93.51%	94.76%

10/5/2020 NORTHEAST	GREATER BOSTON	94.42%	89.99%
10/5/2020 NORTHEAST	LONG ISLAND	93.71%	92.77%
10/5/2020 NORTHEAST	NEW YORK	93.76%	97.27%
	NORTHERN NEW		
10/5/2020 NORTHEAST	ENGLAND	92.14%	83.16%
	NORTHERN NEW		
10/5/2020 NORTHEAST	JERSEY	93.72%	92.28%
10/5/2020 NORTHEAST	TRIBORO	93.39%	96.61%
10/5/2020 NORTHEAST	WESTCHESTER	89.89%	95.22%
10/5/2020 PACIFIC	BAY-VALLEY	95.61%	91.18%
10/5/2020 PACIFIC	HONOLULU	93.07%	51.82%
10/5/2020 PACIFIC	LOS ANGELES	95.12%	96.94%
10/5/2020 PACIFIC	SACRAMENTO	95.81%	96.55%
10/5/2020 PACIFIC	SAN DIEGO	94.93%	97.55%
10/5/2020 PACIFIC	SAN FRANCISCO	96.24%	94.48%
10/5/2020 PACIFIC	SANTA ANA	95.77%	98.28%
10/5/2020 PACIFIC	SIERRA COASTAL	95.10%	98.62%
10/5/2020 SOUTHERN	ALABAMA	88.89%	83.23%
10/5/2020 SOUTHERN	ARKANSAS	93.89%	95.18%
10/5/2020 SOUTHERN	DALLAS	94.44%	94.99%
10/5/2020 SOUTHERN	FT WORTH	95.08%	95.43%
10/5/2020 SOUTHERN	GULF ATLANTIC	86.30%	89.59%
10/5/2020 SOUTHERN	HOUSTON	92.74%	97.71%
10/5/2020 SOUTHERN	LOUISIANA	93.57%	94.22%
10/5/2020 SOUTHERN	MISSISSIPPI	83.35%	84.65%
10/5/2020 SOUTHERN	OKLAHOMA	95.51%	95.21%
10/5/2020 SOUTHERN	RIO GRANDE	95.03%	97.42%
10/5/2020 SOUTHERN	SOUTH FLORIDA	87.93%	89.70%
10/5/2020 SOUTHERN	SUNCOAST	93.13%	93.01%
10/5/2020 WESTERN	ALASKA	92.93%	97.13%
10/5/2020 WESTERN	ARIZONA	92.03%	95.09%
10/5/2020 WESTERN	CENTRAL PLAINS	95.33%	96.23%
10/5/2020 WESTERN	COLORADO/WYOMIN	89.66%	93.92%
10/5/2020 WESTERN	DAKOTAS	95.34%	94.89%
10/5/2020 WESTERN	HAWKEYE	92.46%	90.45%
10/5/2020 WESTERN	MID-AMERICA	91.39%	87.67%
10/5/2020 WESTERN	NEVADA SIERRA	94.76%	94.72%
10/5/2020 WESTERN	NORTHLAND	92.54%	93.42%
10/5/2020 WESTERN	PORTLAND	92.89%	95.25%
10/5/2020 WESTERN	SALT LAKE CITY	95.61%	95.56%
10/5/2020 WESTERN	SEATTLE	93.45%	97.34%
10/6/2020 CAPITAL METRO	ATLANTA	58.18%	86.76%
10/6/2020 CAPITAL METRO	BALTIMORE	45.37%	93.84%
10/6/2020 CAPITAL METRO	CAPITAL	53.14%	95.12%
10/6/2020 CAPITAL METRO	GREATER S CAROLINA	51.75%	96.65%
10/6/2020 CAPITAL METRO	GREENSBORO	56.63%	90.70%
10/6/2020 CAPITAL METRO	MID-CAROLINAS	73.60%	96.62%

10/6/2020 CAPITAL METRO	NORTHERN VIRGINIA	57.29%	96.33%
10/6/2020 CAPITAL METRO	RICHMOND	69.15%	93.32%
10/6/2020 EASTERN	APPALACHIAN	52.54%	96.62%
	CENTRAL		
10/6/2020 EASTERN	PENNSYLVANIA	65.17%	93.93%
10/6/2020 EASTERN	KENTUCKIANA	61.12%	96.67%
10/6/2020 EASTERN	NORTHERN OHIO	64.14%	90.74%
10/6/2020 EASTERN	OHIO VALLEY	63.23%	93.53%
	PHILADELPHIA		
10/6/2020 EASTERN	METROPO	57.72%	82.05%
10/6/2020 EASTERN	SOUTH JERSEY	53.05%	88.85%
10/6/2020 EASTERN	TENNESSEE	68.82%	94.25%
10/6/2020 EASTERN	WESTERN NEW YORK	70.79%	96.89%
	WESTERN		
10/6/2020 EASTERN	PENNSYLVANIA	70.57%	96.95%
10/6/2020 GREAT LAKES	CENTRAL ILLINOIS	67.24%	88.66%
10/6/2020 GREAT LAKES	CHICAGO	52.39%	94.35%
10/6/2020 GREAT LAKES	DETROIT	42.14%	69.49%
10/6/2020 GREAT LAKES	GATEWAY	68.42%	92.98%
10/6/2020 GREAT LAKES	GREATER INDIANA	71.19%	94.46%
10/6/2020 GREAT LAKES	GREATER MICHIGAN	66.30%	93.21%
10/6/2020 GREAT LAKES	LAKELAND	55.40%	92.51%
10/6/2020 NORTHEAST	ALBANY	81.94%	96.86%
10/6/2020 NORTHEAST	CARIBBEAN	87.46%	58.99%
10/6/2020 NORTHEAST	CONNECTICUT VALLEY	75.81%	96.31%
10/6/2020 NORTHEAST	GREATER BOSTON	68.38%	95.93%
10/6/2020 NORTHEAST	LONG ISLAND	77.18%	95.16%
10/6/2020 NORTHEAST	NEW YORK	68.80%	96.85%
	NORTHERN NEW		
10/6/2020 NORTHEAST	ENGLAND	65.28%	94.62%
	NORTHERN NEW		
10/6/2020 NORTHEAST	JERSEY	75.50%	95.86%
10/6/2020 NORTHEAST	TRIBORO	74.82%	86.30%
10/6/2020 NORTHEAST	WESTCHESTER	70.64%	93.75%
10/6/2020 PACIFIC	BAY-VALLEY	83.07%	94.00%
10/6/2020 PACIFIC	HONOLULU	79.12%	92.71%
10/6/2020 PACIFIC	LOS ANGELES	77.52%	96.58%
10/6/2020 PACIFIC	SACRAMENTO	85.83%	96.90%
10/6/2020 PACIFIC	SAN DIEGO	77.03%	96.80%
10/6/2020 PACIFIC	SAN FRANCISCO	74.08%	93.64%
10/6/2020 PACIFIC	SANTA ANA	63.91%	98.35%
10/6/2020 PACIFIC	SIERRA COASTAL	76.39%	97.69%
10/6/2020 SOUTHERN	ALABAMA	61.85%	93.81%
10/6/2020 SOUTHERN	ARKANSAS	73.13%	97.24%
10/6/2020 SOUTHERN	DALLAS	75.75%	96.37%
10/6/2020 SOUTHERN	FT WORTH	76.25%	96.59%
10/6/2020 SOUTHERN	GULF ATLANTIC	64.27%	94.80%



10/6/2020 SOUTHERN	HOUSTON	71.72%	98.19%
10/6/2020 SOUTHERN	LOUISIANA	69.99%	94.93%
10/6/2020 SOUTHERN	MISSISSIPPI	47.05%	88.08%
10/6/2020 SOUTHERN	OKLAHOMA	70.74%	97.00%
10/6/2020 SOUTHERN	RIO GRANDE	73.61%	97.66%
10/6/2020 SOUTHERN	SOUTH FLORIDA	75.45%	89.50%
10/6/2020 SOUTHERN	SUNCOAST	64.04%	91.59%
10/6/2020 WESTERN	ALASKA	88.29%	97.75%
10/6/2020 WESTERN	ARIZONA	73.65%	95.70%
10/6/2020 WESTERN	CENTRAL PLAINS	88.24%	96.56%
10/6/2020 WESTERN	COLORADO/WYOMIN	64.80%	91.48%
10/6/2020 WESTERN	DAKOTAS	81.88%	94.15%
10/6/2020 WESTERN	HAWKEYE	81.89%	94.72%
10/6/2020 WESTERN	MID-AMERICA	62.61%	92.54%
10/6/2020 WESTERN	NEVADA SIERRA	79.57%	95.90%
10/6/2020 WESTERN	NORTHLAND	60.55%	95.93%
10/6/2020 WESTERN	PORTLAND	71.79%	95.08%
10/6/2020 WESTERN	SALT LAKE CITY	79.35%	91.61%
10/6/2020 WESTERN	SEATTLE	71.86%	97.16%
10/7/2020 CAPITAL METRO	ATLANTA	74.09%	72.39%
10/7/2020 CAPITAL METRO	BALTIMORE	58.88%	83.35%
10/7/2020 CAPITAL METRO	CAPITAL	67.02%	90.48%
10/7/2020 CAPITAL METRO	GREATER S CAROLINA	86.68%	93.36%
10/7/2020 CAPITAL METRO	GREENSBORO	82.30%	83.38%
10/7/2020 CAPITAL METRO	MID-CAROLINAS	78.52%	82.21%
10/7/2020 CAPITAL METRO	NORTHERN VIRGINIA	78.10%	94.71%
10/7/2020 CAPITAL METRO	RICHMOND	83.83%	91.71%
10/7/2020 EASTERN	APPALACHIAN	82.15%	94.82%
	CENTRAL		
10/7/2020 EASTERN	PENNSYLVANIA	77.31%	87.62%
10/7/2020 EASTERN	KENTUCKIANA	84.04%	95.18%
10/7/2020 EASTERN	NORTHERN OHIO	82.95%	87.84%
10/7/2020 EASTERN	OHIO VALLEY	80.63%	89.76%
	PHILADELPHIA		
10/7/2020 EASTERN	METROPO	78.38%	85.57%
10/7/2020 EASTERN	SOUTH JERSEY	76.54%	90.47%
10/7/2020 EASTERN	TENNESSEE	87.96%	92.99%
10/7/2020 EASTERN	WESTERN NEW YORK	94.15%	96.49%
	WESTERN		
10/7/2020 EASTERN	PENNSYLVANIA	89.30%	96.78%
10/7/2020 GREAT LAKES	CENTRAL ILLINOIS	75.57%	67.50%
10/7/2020 GREAT LAKES	CHICAGO	82.42%	82.34%
10/7/2020 GREAT LAKES	DETROIT	63.49%	78.51%
10/7/2020 GREAT LAKES	GATEWAY	84.46%	83.62%
10/7/2020 GREAT LAKES	GREATER INDIANA	89.45%	88.63%
10/7/2020 GREAT LAKES	GREATER MICHIGAN	88.26%	92.79%
10/7/2020 GREAT LAKES	LAKELAND	82.23%	89.21%

10/7/2020 NORTHEAST	ALBANY	94.42%	86.84%
10/7/2020 NORTHEAST	CARIBBEAN	96.32%	88.52%
10/7/2020 NORTHEAST	CONNECTICUT VALLEY	87.68%	94.98%
10/7/2020 NORTHEAST	GREATER BOSTON	91.33%	91.31%
10/7/2020 NORTHEAST	LONG ISLAND	84.82%	93.45%
10/7/2020 NORTHEAST	NEW YORK	89.38%	95.17%
	NORTHERN NEW		
10/7/2020 NORTHEAST	ENGLAND	91.88%	93.42%
	NORTHERN NEW		
10/7/2020 NORTHEAST	JERSEY	89.76%	91.97%
10/7/2020 NORTHEAST	TRIBORO	88.76%	94.00%
10/7/2020 NORTHEAST	WESTCHESTER	85.99%	93.14%
10/7/2020 PACIFIC	BAY-VALLEY	95.38%	93.53%
10/7/2020 PACIFIC	HONOLULU	91.32%	91.81%
10/7/2020 PACIFIC	LOS ANGELES	91.51%	95.67%
10/7/2020 PACIFIC	SACRAMENTO	83.41%	95.86%
10/7/2020 PACIFIC	SAN DIEGO	90.72%	97.84%
10/7/2020 PACIFIC	SAN FRANCISCO	91.85%	96.98%
10/7/2020 PACIFIC	SANTA ANA	92.54%	97.36%
10/7/2020 PACIFIC	SIERRA COASTAL	89.65%	98.11%
10/7/2020 SOUTHERN	ALABAMA	85.37%	90.78%
10/7/2020 SOUTHERN	ARKANSAS	92.51%	93.73%
10/7/2020 SOUTHERN	DALLAS	80.61%	94.76%
10/7/2020 SOUTHERN	FT WORTH	93.09%	94.73%
10/7/2020 SOUTHERN	GULF ATLANTIC	81.72%	85.47%
10/7/2020 SOUTHERN	HOUSTON	79.36%	96.31%
10/7/2020 SOUTHERN	LOUISIANA	91.07%	95.58%
10/7/2020 SOUTHERN	MISSISSIPPI	83.03%	86.08%
10/7/2020 SOUTHERN	OKLAHOMA	94.93%	96.53%
10/7/2020 SOUTHERN	RIO GRANDE	90.61%	95.38%
10/7/2020 SOUTHERN	SOUTH FLORIDA	70.42%	88.63%
10/7/2020 SOUTHERN	SUNCOAST	87.51%	88.99%
10/7/2020 WESTERN	ALASKA	91.27%	94.49%
10/7/2020 WESTERN	ARIZONA	88.69%	95.74%
10/7/2020 WESTERN	CENTRAL PLAINS	91.61%	95.47%
10/7/2020 WESTERN	COLORADO/WYOMIN	81.20%	94.11%
10/7/2020 WESTERN	DAKOTAS	91.68%	95.10%
10/7/2020 WESTERN	HAWKEYE	88.59%	92.72%
10/7/2020 WESTERN	MID-AMERICA	86.66%	85.92%
10/7/2020 WESTERN	NEVADA SIERRA	87.30%	93.26%
10/7/2020 WESTERN	NORTHLAND	84.59%	95.72%
10/7/2020 WESTERN	PORTLAND	93.03%	95.11%
10/7/2020 WESTERN	SALT LAKE CITY	89.92%	94.23%
10/7/2020 WESTERN	SEATTLE	93.16%	96.79%
10/8/2020 CAPITAL METRO	ATLANTA	91.55%	75.66%
10/8/2020 CAPITAL METRO	BALTIMORE	79.53%	70.85%
10/8/2020 CAPITAL METRO	CAPITAL	82.13%	84.57%

10/8/2020 CAPITAL METRO	GREATER S CAROLINA	91.08%	93.60%
10/8/2020 CAPITAL METRO	GREENSBORO	86.89%	81.75%
10/8/2020 CAPITAL METRO	MID-CAROLINAS	89.21%	90.70%
10/8/2020 CAPITAL METRO	NORTHERN VIRGINIA	91.64%	90.38%
10/8/2020 CAPITAL METRO	RICHMOND	90.42%	85.62%
10/8/2020 EASTERN	APPALACHIAN	90.56%	89.68%
	CENTRAL		
10/8/2020 EASTERN	PENNSYLVANIA	87.43%	81.43%
10/8/2020 EASTERN	KENTUCKIANA	90.61%	95.13%
10/8/2020 EASTERN	NORTHERN OHIO	91.68%	87.43%
10/8/2020 EASTERN	OHIO VALLEY	90.42%	71.77%
	PHILADELPHIA		
10/8/2020 EASTERN	METROPO	90.95%	64.85%
10/8/2020 EASTERN	SOUTH JERSEY	89.69%	86.68%
10/8/2020 EASTERN	TENNESSEE	93.85%	92.26%
10/8/2020 EASTERN	WESTERN NEW YORK	95.73%	93.89%
	WESTERN		
10/8/2020 EASTERN	PENNSYLVANIA	94.28%	96.99%
10/8/2020 GREAT LAKES	CENTRAL ILLINOIS	87.45%	73.72%
10/8/2020 GREAT LAKES	CHICAGO	93.35%	95.89%
10/8/2020 GREAT LAKES	DETROIT	80.27%	67.63%
10/8/2020 GREAT LAKES	GATEWAY	91.74%	86.04%
10/8/2020 GREAT LAKES	GREATER INDIANA	94.45%	93.60%
10/8/2020 GREAT LAKES	GREATER MICHIGAN	91.58%	88.85%
10/8/2020 GREAT LAKES	LAKELAND	92.97%	80.09%
10/8/2020 NORTHEAST	ALBANY	93.13%	83.21%
10/8/2020 NORTHEAST	CARIBBEAN	99.08%	96.63%
10/8/2020 NORTHEAST	CONNECTICUT VALLEY	95.68%	92.50%
10/8/2020 NORTHEAST	GREATER BOSTON	95.76%	88.93%
10/8/2020 NORTHEAST	LONG ISLAND	89.95%	94.65%
10/8/2020 NORTHEAST	NEW YORK	93.90%	97.20%
	NORTHERN NEW		
10/8/2020 NORTHEAST	ENGLAND	94.16%	85.94%
	NORTHERN NEW		
10/8/2020 NORTHEAST	JERSEY	95.54%	93.09%
10/8/2020 NORTHEAST	TRIBORO	96.44%	90.02%
10/8/2020 NORTHEAST	WESTCHESTER	92.73%	90.07%
10/8/2020 PACIFIC	BAY-VALLEY	95.27%	93.59%
10/8/2020 PACIFIC	HONOLULU	87.53%	92.26%
10/8/2020 PACIFIC	LOS ANGELES	95.26%	97.30%
10/8/2020 PACIFIC	SACRAMENTO	95.04%	95.92%
10/8/2020 PACIFIC	SAN DIEGO	95.65%	96.74%
10/8/2020 PACIFIC	SAN FRANCISCO	95.03%	96.75%
10/8/2020 PACIFIC	SANTA ANA	93.67%	97.92%
10/8/2020 PACIFIC	SIERRA COASTAL	94.30%	98.32%
10/8/2020 SOUTHERN	ALABAMA	83.08%	82.77%
10/8/2020 SOUTHERN	ARKANSAS	95.22%	94.38%

10/8/2020 SOUTHERN	DALLAS	93.41%	95.91%
10/8/2020 SOUTHERN	FT WORTH	95.07%	94.72%
10/8/2020 SOUTHERN	GULF ATLANTIC	92.87%	92.04%
10/8/2020 SOUTHERN	HOUSTON	94.25%	97.02%
10/8/2020 SOUTHERN	LOUISIANA	94.85%	95.08%
10/8/2020 SOUTHERN	MISSISSIPPI	87.59%	88.53%
10/8/2020 SOUTHERN	OKLAHOMA	95.60%	95.20%
10/8/2020 SOUTHERN	RIO GRANDE	94.48%	97.19%
10/8/2020 SOUTHERN	SOUTH FLORIDA	91.39%	83.50%
10/8/2020 SOUTHERN	SUNCOAST	94.21%	85.51%
10/8/2020 WESTERN	ALASKA	96.28%	95.86%
10/8/2020 WESTERN	ARIZONA	95.73%	93.36%
10/8/2020 WESTERN	CENTRAL PLAINS	96.58%	94.48%
10/8/2020 WESTERN	COLORADO/WYOMIN	90.57%	94.29%
10/8/2020 WESTERN	DAKOTAS	95.29%	95.40%
10/8/2020 WESTERN	HAWKEYE	91.14%	93.20%
10/8/2020 WESTERN	MID-AMERICA	94.36%	83.75%
10/8/2020 WESTERN	NEVADA SIERRA	96.04%	96.96%
10/8/2020 WESTERN	NORTHLAND	92.15%	95.06%
10/8/2020 WESTERN	PORTLAND	95.27%	96.58%
10/8/2020 WESTERN	SALT LAKE CITY	97.16%	94.96%
10/8/2020 WESTERN	SEATTLE	94.63%	96.92%
10/9/2020 CAPITAL METRO	ATLANTA	90.18%	68.68%
10/9/2020 CAPITAL METRO	BALTIMORE	80.31%	85.83%
10/9/2020 CAPITAL METRO	CAPITAL	78.50%	88.51%
10/9/2020 CAPITAL METRO	GREATER S CAROLINA	82.77%	85.87%
10/9/2020 CAPITAL METRO	GREENSBORO	79.48%	82.21%
10/9/2020 CAPITAL METRO	MID-CAROLINAS	91.46%	90.12%
10/9/2020 CAPITAL METRO	NORTHERN VIRGINIA	83.60%	94.64%
10/9/2020 CAPITAL METRO	RICHMOND	88.70%	91.36%
10/9/2020 EASTERN	APPALACHIAN	85.04%	91.38%
	CENTRAL		
10/9/2020 EASTERN	PENNSYLVANIA	86.24%	91.40%
10/9/2020 EASTERN	KENTUCKIANA	88.68%	95.60%
10/9/2020 EASTERN	NORTHERN OHIO	83.34%	85.16%
10/9/2020 EASTERN	OHIO VALLEY	86.74%	77.35%
	PHILADELPHIA		
10/9/2020 EASTERN	METROPO	81.55%	69.81%
10/9/2020 EASTERN	SOUTH JERSEY	83.02%	85.42%
10/9/2020 EASTERN	TENNESSEE	88.25%	90.70%
10/9/2020 EASTERN	WESTERN NEW YORK	91.80%	94.39%
	WESTERN		
10/9/2020 EASTERN	PENNSYLVANIA	93.18%	97.10%
10/9/2020 GREAT LAKES	CENTRAL ILLINOIS	82.15%	80.15%
10/9/2020 GREAT LAKES	CHICAGO	88.80%	92.24%
10/9/2020 GREAT LAKES	DETROIT	76.48%	63.46%
10/9/2020 GREAT LAKES	GATEWAY	91.49%	84.35%

10/9/2020 GREAT LAKES	GREATER INDIANA	94.99%	91.00%
10/9/2020 GREAT LAKES	GREATER MICHIGAN	90.50%	88.57%
10/9/2020 GREAT LAKES	LAKELAND	90.38%	92.89%
10/9/2020 NORTHEAST	ALBANY	85.30%	78.72%
10/9/2020 NORTHEAST	CARIBBEAN	96.02%	94.48%
10/9/2020 NORTHEAST	CONNECTICUT VALLEY	94.98%	92.64%
10/9/2020 NORTHEAST	GREATER BOSTON	92.11%	92.00%
10/9/2020 NORTHEAST	LONG ISLAND	78.18%	96.25%
10/9/2020 NORTHEAST	NEW YORK	88.33%	98.28%
	NORTHERN NEW		
10/9/2020 NORTHEAST	ENGLAND	91.32%	80.26%
	NORTHERN NEW		
10/9/2020 NORTHEAST	JERSEY	92.75%	91.82%
10/9/2020 NORTHEAST	TRIBORO	88.54%	93.69%
10/9/2020 NORTHEAST	WESTCHESTER	89.36%	84.86%
10/9/2020 PACIFIC	BAY-VALLEY	93.38%	90.06%
10/9/2020 PACIFIC	HONOLULU	93.31%	81.40%
10/9/2020 PACIFIC	LOS ANGELES	95.17%	95.56%
10/9/2020 PACIFIC	SACRAMENTO	89.53%	89.73%
10/9/2020 PACIFIC	SAN DIEGO	91.47%	96.47%
10/9/2020 PACIFIC	SAN FRANCISCO	95.64%	96.61%
10/9/2020 PACIFIC	SANTA ANA	92.36%	97.52%
10/9/2020 PACIFIC	SIERRA COASTAL	92.98%	97.72%
10/9/2020 SOUTHERN	ALABAMA	78.72%	78.65%
10/9/2020 SOUTHERN	ARKANSAS	92.25%	91.84%
10/9/2020 SOUTHERN	DALLAS	87.40%	93.94%
10/9/2020 SOUTHERN	FT WORTH	91.86%	91.77%
10/9/2020 SOUTHERN	GULF ATLANTIC	82.90%	85.63%
10/9/2020 SOUTHERN	HOUSTON	90.19%	94.07%
10/9/2020 SOUTHERN	LOUISIANA	89.77%	84.49%
10/9/2020 SOUTHERN	MISSISSIPPI	87.46%	90.98%
10/9/2020 SOUTHERN	OKLAHOMA	92.45%	94.35%
10/9/2020 SOUTHERN	RIO GRANDE	92.07%	95.20%
10/9/2020 SOUTHERN	SOUTH FLORIDA	92.39%	88.60%
10/9/2020 SOUTHERN	SUNCOAST	90.40%	90.49%
10/9/2020 WESTERN	ALASKA	95.49%	94.42%
10/9/2020 WESTERN	ARIZONA	92.23%	94.36%
10/9/2020 WESTERN	CENTRAL PLAINS	94.04%	92.35%
10/9/2020 WESTERN	COLORADO/WYOMIN	88.43%	81.27%
10/9/2020 WESTERN	DAKOTAS	94.33%	93.56%
10/9/2020 WESTERN	HAWKEYE	88.24%	88.49%
10/9/2020 WESTERN	MID-AMERICA	80.94%	71.57%
10/9/2020 WESTERN	NEVADA SIERRA	92.60%	95.63%
10/9/2020 WESTERN	NORTHLAND	88.31%	95.72%
10/9/2020 WESTERN	PORTLAND	93.84%	95.80%
10/9/2020 WESTERN	SALT LAKE CITY	92.81%	93.90%
10/9/2020 WESTERN	SEATTLE	89.92%	97.43%

10/10/2020 CAPITAL METRO	ATLANTA	85.62%	73.94%
10/10/2020 CAPITAL METRO	BALTIMORE	75.90%	87.45%
10/10/2020 CAPITAL METRO	CAPITAL	76.61%	88.70%
10/10/2020 CAPITAL METRO	GREATER S CAROLINA	78.95%	89.25%
10/10/2020 CAPITAL METRO	GREENSBORO	80.98%	86.79%
10/10/2020 CAPITAL METRO	MID-CAROLINAS	85.22%	91.66%
10/10/2020 CAPITAL METRO	NORTHERN VIRGINIA	84.51%	93.60%
10/10/2020 CAPITAL METRO	RICHMOND	87.12%	88.93%
10/10/2020 EASTERN	APPALACHIAN	90.70%	94.24%
	CENTRAL		
10/10/2020 EASTERN	PENNSYLVANIA	78.57%	93.82%
10/10/2020 EASTERN	KENTUCKIANA	86.65%	96.87%
10/10/2020 EASTERN	NORTHERN OHIO	76.57%	70.72%
10/10/2020 EASTERN	OHIO VALLEY	84.76%	81.50%
	PHILADELPHIA		
10/10/2020 EASTERN	METROPO	87.21%	87.37%
10/10/2020 EASTERN	SOUTH JERSEY	84.57%	76.02%
10/10/2020 EASTERN	TENNESSEE	87.39%	94.61%
10/10/2020 EASTERN	WESTERN NEW YORK	92.41%	91.67%
	WESTERN		
10/10/2020 EASTERN	PENNSYLVANIA	90.21%	98.36%
10/10/2020 GREAT LAKES	CENTRAL ILLINOIS	79.67%	79.61%
10/10/2020 GREAT LAKES	CHICAGO	86.16%	85.04%
10/10/2020 GREAT LAKES	DETROIT	75.12%	65.63%
10/10/2020 GREAT LAKES	GATEWAY	88.99%	90.06%
10/10/2020 GREAT LAKES	GREATER INDIANA	90.62%	90.69%
10/10/2020 GREAT LAKES	GREATER MICHIGAN	87.02%	93.43%
10/10/2020 GREAT LAKES	LAKELAND	85.92%	86.06%
10/10/2020 NORTHEAST	ALBANY	89.47%	91.77%
10/10/2020 NORTHEAST	CARIBBEAN	95.81%	97.46%
10/10/2020 NORTHEAST	CONNECTICUT VALLEY	88.29%	93.61%
10/10/2020 NORTHEAST	GREATER BOSTON	92.93%	75.69%
10/10/2020 NORTHEAST	LONG ISLAND	86.49%	96.42%
10/10/2020 NORTHEAST	NEW YORK	90.69%	97.91%
	NORTHERN NEW		
10/10/2020 NORTHEAST	ENGLAND	89.59%	85.09%
	NORTHERN NEW		
10/10/2020 NORTHEAST	JERSEY	91.22%	92.48%
10/10/2020 NORTHEAST	TRIBORO	92.08%	91.02%
10/10/2020 NORTHEAST	WESTCHESTER	87.93%	84.86%
10/10/2020 PACIFIC	BAY-VALLEY	92.37%	85.45%
10/10/2020 PACIFIC	HONOLULU	85.27%	75.11%
10/10/2020 PACIFIC	LOS ANGELES	95.09%	96.30%
10/10/2020 PACIFIC	SACRAMENTO	92.99%	95.69%
10/10/2020 PACIFIC	SAN DIEGO	92.48%	95.65%
10/10/2020 PACIFIC	SAN FRANCISCO	89.61%	96.02%
10/10/2020 PACIFIC	SANTA ANA	92.77%	98.10%

10/10/2020 PACIFIC	SIERRA COASTAL	94.88%	97.74%
10/10/2020 SOUTHERN	ALABAMA	78.30%	81.65%
10/10/2020 SOUTHERN	ARKANSAS	91.03%	95.03%
10/10/2020 SOUTHERN	DALLAS	87.04%	93.92%
10/10/2020 SOUTHERN	FT WORTH	88.44%	95.43%
10/10/2020 SOUTHERN	GULF ATLANTIC	83.52%	85.34%
10/10/2020 SOUTHERN	HOUSTON	92.60%	94.56%
10/10/2020 SOUTHERN	LOUISIANA	87.30%	94.51%
10/10/2020 SOUTHERN	MISSISSIPPI	85.53%	89.91%
10/10/2020 SOUTHERN	OKLAHOMA	91.09%	94.36%
10/10/2020 SOUTHERN	RIO GRANDE	91.87%	96.75%
10/10/2020 SOUTHERN	SOUTH FLORIDA	90.08%	86.15%
10/10/2020 SOUTHERN	SUNCOAST	86.35%	86.55%
10/10/2020 WESTERN	ALASKA	90.84%	95.02%
10/10/2020 WESTERN	ARIZONA	89.56%	77.01%
10/10/2020 WESTERN	CENTRAL PLAINS	94.62%	95.66%
10/10/2020 WESTERN	COLORADO/WYOMIN	86.85%	93.20%
10/10/2020 WESTERN	DAKOTAS	94.13%	96.36%
10/10/2020 WESTERN	HAWKEYE	89.81%	93.03%
10/10/2020 WESTERN	MID-AMERICA	79.28%	89.87%
10/10/2020 WESTERN	NEVADA SIERRA	90.98%	94.97%
10/10/2020 WESTERN	NORTHLAND	87.86%	93.18%
10/10/2020 WESTERN	PORTLAND	92.46%	97.17%
10/10/2020 WESTERN	SALT LAKE CITY	90.88%	87.57%
10/10/2020 WESTERN	SEATTLE	90.64%	97.24%
10/13/2020 CAPITAL METRO	ATLANTA	87.63%	72.93%
10/13/2020 CAPITAL METRO	BALTIMORE	75.80%	73.68%
10/13/2020 CAPITAL METRO	CAPITAL	85.33%	94.53%
10/13/2020 CAPITAL METRO	GREATER S CAROLINA	83.48%	92.25%
10/13/2020 CAPITAL METRO	GREENSBORO	88.36%	90.85%
10/13/2020 CAPITAL METRO	MID-CAROLINAS	91.62%	95.93%
10/13/2020 CAPITAL METRO	NORTHERN VIRGINIA	92.39%	95.27%
10/13/2020 CAPITAL METRO	RICHMOND	90.43%	87.24%
10/13/2020 EASTERN	APPALACHIAN	89.33%	94.10%
	CENTRAL		
10/13/2020 EASTERN	PENNSYLVANIA	86.82%	94.43%
10/13/2020 EASTERN	KENTUCKIANA	89.79%	96.24%
10/13/2020 EASTERN	NORTHERN OHIO	85.81%	82.95%
10/13/2020 EASTERN	OHIO VALLEY	87.46%	92.45%
	PHILADELPHIA		
10/13/2020 EASTERN	METROPO	86.17%	75.46%
10/13/2020 EASTERN	SOUTH JERSEY	87.72%	88.06%
10/13/2020 EASTERN	TENNESSEE	90.89%	90.50%
10/13/2020 EASTERN	WESTERN NEW YORK	92.95%	93.25%
	WESTERN		
10/13/2020 EASTERN	PENNSYLVANIA	92.46%	97.70%
10/13/2020 GREAT LAKES	CENTRAL ILLINOIS	85.71%	82.96%

10/13/2020 GREAT LAKES	CHICAGO	91.00%	93.73%
10/13/2020 GREAT LAKES	DETROIT	83.84%	63.74%
10/13/2020 GREAT LAKES	GATEWAY	92.35%	94.84%
10/13/2020 GREAT LAKES	GREATER INDIANA	93.96%	93.66%
10/13/2020 GREAT LAKES	GREATER MICHIGAN	91.13%	92.04%
10/13/2020 GREAT LAKES	LAKELAND	90.06%	90.26%
10/13/2020 NORTHEAST	ALBANY	90.10%	85.92%
10/13/2020 NORTHEAST	CARIBBEAN	97.00%	97.86%
10/13/2020 NORTHEAST	CONNECTICUT VALLEY	90.10%	92.97%
10/13/2020 NORTHEAST	GREATER BOSTON	93.18%	93.33%
10/13/2020 NORTHEAST	LONG ISLAND	86.70%	93.88%
10/13/2020 NORTHEAST	NEW YORK	92.44%	98.13%
	NORTHERN NEW		
10/13/2020 NORTHEAST	ENGLAND	92.07%	80.89%
	NORTHERN NEW		
10/13/2020 NORTHEAST	JERSEY	93.34%	92.86%
10/13/2020 NORTHEAST	TRIBORO	93.00%	94.81%
10/13/2020 NORTHEAST	WESTCHESTER	89.05%	92.67%
10/13/2020 PACIFIC	BAY-VALLEY	94.27%	93.74%
10/13/2020 PACIFIC	HONOLULU	88.98%	73.06%
10/13/2020 PACIFIC	LOS ANGELES	94.91%	96.38%
10/13/2020 PACIFIC	SACRAMENTO	93.83%	94.84%
10/13/2020 PACIFIC	SAN DIEGO	94.78%	96.89%
10/13/2020 PACIFIC	SAN FRANCISCO	94.57%	96.45%
10/13/2020 PACIFIC	SANTA ANA	95.57%	97.53%
10/13/2020 PACIFIC	SIERRA COASTAL	95.40%	97.87%
10/13/2020 SOUTHERN	ALABAMA	83.46%	81.12%
10/13/2020 SOUTHERN	ARKANSAS	93.21%	93.62%
10/13/2020 SOUTHERN	DALLAS	91.65%	96.13%
10/13/2020 SOUTHERN	FT WORTH	93.60%	94.38%
10/13/2020 SOUTHERN	GULF ATLANTIC	86.94%	87.99%
10/13/2020 SOUTHERN	HOUSTON	90.63%	97.92%
10/13/2020 SOUTHERN	LOUISIANA	86.63%	90.13%
10/13/2020 SOUTHERN	MISSISSIPPI	80.70%	87.52%
10/13/2020 SOUTHERN	OKLAHOMA	95.54%	96.13%
10/13/2020 SOUTHERN	RIO GRANDE	93.63%	96.99%
10/13/2020 SOUTHERN	SOUTH FLORIDA	91.55%	90.75%
10/13/2020 SOUTHERN	SUNCOAST	90.91%	88.61%
10/13/2020 WESTERN	ALASKA	91.85%	97.11%
10/13/2020 WESTERN	ARIZONA	87.57%	85.09%
10/13/2020 WESTERN	CENTRAL PLAINS	95.90%	97.22%
10/13/2020 WESTERN	COLORADO/WYOMIN	85.81%	85.07%
10/13/2020 WESTERN	DAKOTAS	94.07%	96.05%
10/13/2020 WESTERN	HAWKEYE	91.22%	91.35%
10/13/2020 WESTERN	MID-AMERICA	88.25%	93.66%
10/13/2020 WESTERN	NEVADA SIERRA	92.58%	94.87%
10/13/2020 WESTERN	NORTHLAND	91.26%	93.84%



10/13/2020 WESTERN	PORTLAND	93.28%	96.37%
10/13/2020 WESTERN	SALT LAKE CITY	93.72%	94.98%
10/13/2020 WESTERN	SEATTLE	93.20%	97.00%
10/14/2020 CAPITAL METRO	ATLANTA	57.07%	60.22%
10/14/2020 CAPITAL METRO	BALTIMORE	29.78%	85.27%
10/14/2020 CAPITAL METRO	CAPITAL	54.96%	90.76%
10/14/2020 CAPITAL METRO	GREATER S CAROLINA	58.67%	92.45%
10/14/2020 CAPITAL METRO	GREENSBORO	49.17%	85.80%
10/14/2020 CAPITAL METRO	MID-CAROLINAS	39.93%	91.31%
10/14/2020 CAPITAL METRO	NORTHERN VIRGINIA	35.48%	95.26%
10/14/2020 CAPITAL METRO	RICHMOND	56.25%	91.00%
10/14/2020 EASTERN	APPALACHIAN	76.82%	94.53%
	CENTRAL		
10/14/2020 EASTERN	PENNSYLVANIA	51.28%	88.54%
10/14/2020 EASTERN	KENTUCKIANA	64.32%	95.35%
10/14/2020 EASTERN	NORTHERN OHIO	50.42%	67.57%
10/14/2020 EASTERN	OHIO VALLEY	59.86%	88.82%
	PHILADELPHIA		
10/14/2020 EASTERN	METROPO	26.48%	64.57%
10/14/2020 EASTERN	SOUTH JERSEY	52.97%	89.24%
10/14/2020 EASTERN	TENNESSEE	76.35%	92.32%
10/14/2020 EASTERN	WESTERN NEW YORK	72.06%	95.05%
	WESTERN		
10/14/2020 EASTERN	PENNSYLVANIA	59.20%	96.43%
10/14/2020 GREAT LAKES	CENTRAL ILLINOIS	48.67%	85.69%
10/14/2020 GREAT LAKES	CHICAGO	61.29%	88.99%
10/14/2020 GREAT LAKES	DETROIT	40.64%	65.71%
10/14/2020 GREAT LAKES	GATEWAY	64.79%	89.07%
10/14/2020 GREAT LAKES	GREATER INDIANA	61.17%	88.68%
10/14/2020 GREAT LAKES	GREATER MICHIGAN	63.27%	81.44%
10/14/2020 GREAT LAKES	LAKELAND	64.54%	88.93%
10/14/2020 NORTHEAST	ALBANY	68.37%	95.56%
10/14/2020 NORTHEAST	CARIBBEAN	98.25%	63.58%
10/14/2020 NORTHEAST	CONNECTICUT VALLEY	64.06%	94.62%
10/14/2020 NORTHEAST	GREATER BOSTON	64.48%	93.80%
10/14/2020 NORTHEAST	LONG ISLAND	59.03%	94.94%
10/14/2020 NORTHEAST	NEW YORK	59.39%	91.91%
	NORTHERN NEW		
10/14/2020 NORTHEAST	ENGLAND	71.09%	92.72%
	NORTHERN NEW		
10/14/2020 NORTHEAST	JERSEY	64.09%	92.05%
10/14/2020 NORTHEAST	TRIBORO	76.41%	93.46%
10/14/2020 NORTHEAST	WESTCHESTER	75.99%	93.38%
10/14/2020 PACIFIC	BAY-VALLEY	86.24%	95.26%
10/14/2020 PACIFIC	HONOLULU	61.39%	71.40%
10/14/2020 PACIFIC	LOS ANGELES	65.08%	96.09%
10/14/2020 PACIFIC	SACRAMENTO	82.92%	91.83%

10/14/2020 PACIFIC	SAN DIEGO	80.28%	97.71%
10/14/2020 PACIFIC	SAN FRANCISCO	82.56%	95.34%
10/14/2020 PACIFIC	SANTA ANA	86.23%	97.18%
10/14/2020 PACIFIC	SIERRA COASTAL	71.92%	97.94%
10/14/2020 SOUTHERN	ALABAMA	55.22%	55.07%
10/14/2020 SOUTHERN	ARKANSAS	74.50%	95.38%
10/14/2020 SOUTHERN	DALLAS	51.97%	94.15%
10/14/2020 SOUTHERN	FT WORTH	80.78%	95.04%
10/14/2020 SOUTHERN	GULF ATLANTIC	54.03%	86.98%
10/14/2020 SOUTHERN	HOUSTON	78.17%	91.90%
10/14/2020 SOUTHERN	LOUISIANA	64.04%	90.38%
10/14/2020 SOUTHERN	MISSISSIPPI	39.96%	76.36%
10/14/2020 SOUTHERN	OKLAHOMA	88.92%	94.43%
10/14/2020 SOUTHERN	RIO GRANDE	78.15%	95.41%
10/14/2020 SOUTHERN	SOUTH FLORIDA	37.97%	59.96%
10/14/2020 SOUTHERN	SUNCOAST	68.98%	91.92%
10/14/2020 WESTERN	ALASKA	84.14%	95.35%
10/14/2020 WESTERN	ARIZONA	56.94%	76.46%
10/14/2020 WESTERN	CENTRAL PLAINS	81.81%	95.05%
10/14/2020 WESTERN	COLORADO/WYOMIN	39.07%	78.79%
10/14/2020 WESTERN	DAKOTAS	78.37%	89.01%
10/14/2020 WESTERN	HAWKEYE	73.77%	79.60%
10/14/2020 WESTERN	MID-AMERICA	66.68%	86.55%
10/14/2020 WESTERN	NEVADA SIERRA	83.36%	94.48%
10/14/2020 WESTERN	NORTHLAND	50.12%	84.61%
10/14/2020 WESTERN	PORTLAND	75.65%	91.70%
10/14/2020 WESTERN	SALT LAKE CITY	62.45%	82.90%
10/14/2020 WESTERN	SEATTLE	65.37%	92.32%
10/15/2020 CAPITAL METRO	ATLANTA	89.14%	66.33%
10/15/2020 CAPITAL METRO	BALTIMORE	64.29%	60.94%
10/15/2020 CAPITAL METRO	CAPITAL	87.11%	90.64%
10/15/2020 CAPITAL METRO	GREATER S CAROLINA	90.61%	91.57%
10/15/2020 CAPITAL METRO	GREENSBORO	85.11%	71.18%
10/15/2020 CAPITAL METRO	MID-CAROLINAS	90.57%	91.98%
10/15/2020 CAPITAL METRO	NORTHERN VIRGINIA	92.71%	93.28%
10/15/2020 CAPITAL METRO	RICHMOND	91.69%	85.91%
10/15/2020 EASTERN	APPALACHIAN	92.20%	91.90%
	CENTRAL		
10/15/2020 EASTERN	PENNSYLVANIA	84.70%	89.34%
10/15/2020 EASTERN	KENTUCKIANA	92.22%	94.86%
10/15/2020 EASTERN	NORTHERN OHIO	89.42%	63.14%
10/15/2020 EASTERN	OHIO VALLEY	90.21%	85.24%
	PHILADELPHIA		
10/15/2020 EASTERN	METROPO	81.34%	59.91%
10/15/2020 EASTERN	SOUTH JERSEY	95.14%	83.05%
10/15/2020 EASTERN	TENNESSEE	93.53%	87.94%
10/15/2020 EASTERN	WESTERN NEW YORK	95.41%	94.93%

	WESTERN		
10/15/2020 EASTERN	PENNSYLVANIA	92.43%	88.58%
10/15/2020 GREAT LAKES	CENTRAL ILLINOIS	88.02%	85.07%
10/15/2020 GREAT LAKES	CHICAGO	92.05%	93.75%
10/15/2020 GREAT LAKES	DETROIT	79.22%	65.79%
10/15/2020 GREAT LAKES	GATEWAY	92.94%	90.34%
10/15/2020 GREAT LAKES	GREATER INDIANA	94.65%	92.48%
10/15/2020 GREAT LAKES	GREATER MICHIGAN	92.08%	87.01%
10/15/2020 GREAT LAKES	LAKELAND	93.21%	92.74%
10/15/2020 NORTHEAST	ALBANY	91.60%	91.43%
10/15/2020 NORTHEAST	CARIBBEAN	97.75%	97.08%
10/15/2020 NORTHEAST	CONNECTICUT VALLEY	94.61%	93.54%
10/15/2020 NORTHEAST	GREATER BOSTON	95.73%	89.95%
10/15/2020 NORTHEAST	LONG ISLAND	92.40%	92.53%
10/15/2020 NORTHEAST	NEW YORK	95.06%	97.07%
	NORTHERN NEW		
10/15/2020 NORTHEAST	ENGLAND	93.82%	91.45%
	NORTHERN NEW		
10/15/2020 NORTHEAST	JERSEY	95.74%	84.46%
10/15/2020 NORTHEAST	TRIBORO	94.17%	88.40%
10/15/2020 NORTHEAST	WESTCHESTER	93.76%	83.28%
10/15/2020 PACIFIC	BAY-VALLEY	96.77%	93.37%
10/15/2020 PACIFIC	HONOLULU	84.35%	80.23%
10/15/2020 PACIFIC	LOS ANGELES	93.26%	95.56%
10/15/2020 PACIFIC	SACRAMENTO	95.94%	91.27%
10/15/2020 PACIFIC	SAN DIEGO	94.53%	93.93%
10/15/2020 PACIFIC	SAN FRANCISCO	96.24%	95.59%
10/15/2020 PACIFIC	SANTA ANA	94.84%	96.89%
10/15/2020 PACIFIC	SIERRA COASTAL	95.50%	96.34%
10/15/2020 SOUTHERN	ALABAMA	88.77%	63.26%
10/15/2020 SOUTHERN	ARKANSAS	93.95%	93.76%
10/15/2020 SOUTHERN	DALLAS	90.42%	95.76%
10/15/2020 SOUTHERN	FT WORTH	94.81%	96.68%
10/15/2020 SOUTHERN	GULF ATLANTIC	93.47%	90.28%
10/15/2020 SOUTHERN	HOUSTON	95.62%	95.62%
10/15/2020 SOUTHERN	LOUISIANA	96.61%	92.95%
10/15/2020 SOUTHERN	MISSISSIPPI	83.42%	76.12%
10/15/2020 SOUTHERN	OKLAHOMA	97.55%	93.57%
10/15/2020 SOUTHERN	RIO GRANDE	95.95%	96.17%
10/15/2020 SOUTHERN	SOUTH FLORIDA	84.51%	81.73%
10/15/2020 SOUTHERN	SUNCOAST	92.98%	93.31%
10/15/2020 WESTERN	ALASKA	90.57%	97.12%
10/15/2020 WESTERN	ARIZONA	93.74%	68.77%
10/15/2020 WESTERN	CENTRAL PLAINS	97.40%	93.87%
10/15/2020 WESTERN	COLORADO/WYOMIN	86.83%	84.55%
10/15/2020 WESTERN	DAKOTAS	95.66%	94.57%
10/15/2020 WESTERN	HAWKEYE	95.51%	86.84%

10/15/2020 WESTERN	MID-AMERICA	93.49%	88.34%
10/15/2020 WESTERN	NEVADA SIERRA	96.11%	96.14%
10/15/2020 WESTERN	NORTHLAND	93.84%	85.81%
10/15/2020 WESTERN	PORTLAND	94.87%	95.25%
10/15/2020 WESTERN	SALT LAKE CITY	93.15%	94.08%
10/15/2020 WESTERN	SEATTLE	95.68%	96.34%
10/16/2020 CAPITAL METRO	ATLANTA	93.40%	70.11%
10/16/2020 CAPITAL METRO	BALTIMORE	74.28%	86.11%
10/16/2020 CAPITAL METRO	CAPITAL	89.05%	95.26%
10/16/2020 CAPITAL METRO	GREATER S CAROLINA	91.53%	94.89%
10/16/2020 CAPITAL METRO	GREENSBORO	85.73%	85.34%
10/16/2020 CAPITAL METRO	MID-CAROLINAS	92.06%	93.80%
10/16/2020 CAPITAL METRO	NORTHERN VIRGINIA	89.72%	92.48%
10/16/2020 CAPITAL METRO	RICHMOND	91.89%	89.63%
10/16/2020 EASTERN	APPALACHIAN	89.12%	95.60%
	CENTRAL		
10/16/2020 EASTERN	PENNSYLVANIA	83.33%	94.06%
10/16/2020 EASTERN	KENTUCKIANA	92.89%	96.74%
10/16/2020 EASTERN	NORTHERN OHIO	86.61%	83.88%
10/16/2020 EASTERN	OHIO VALLEY	89.23%	92.60%
	PHILADELPHIA		
10/16/2020 EASTERN	METROPO	83.93%	87.17%
10/16/2020 EASTERN	SOUTH JERSEY	89.56%	91.66%
10/16/2020 EASTERN	TENNESSEE	92.84%	91.91%
10/16/2020 EASTERN	WESTERN NEW YORK	95.90%	96.00%
	WESTERN		
10/16/2020 EASTERN	PENNSYLVANIA	90.61%	95.55%
10/16/2020 GREAT LAKES	CENTRAL ILLINOIS	91.57%	90.38%
10/16/2020 GREAT LAKES	CHICAGO	92.79%	93.64%
10/16/2020 GREAT LAKES	DETROIT	79.02%	82.67%
10/16/2020 GREAT LAKES	GATEWAY	95.05%	93.51%
10/16/2020 GREAT LAKES	GREATER INDIANA	95.02%	94.42%
10/16/2020 GREAT LAKES	GREATER MICHIGAN	91.39%	93.73%
10/16/2020 GREAT LAKES	LAKELAND	94.50%	94.97%
10/16/2020 NORTHEAST	ALBANY	92.51%	95.25%
10/16/2020 NORTHEAST	CARIBBEAN	98.12%	97.12%
10/16/2020 NORTHEAST	CONNECTICUT VALLEY	94.27%	95.32%
10/16/2020 NORTHEAST	GREATER BOSTON	92.20%	94.45%
10/16/2020 NORTHEAST	LONG ISLAND	91.07%	93.54%
10/16/2020 NORTHEAST	NEW YORK	93.81%	94.51%
	NORTHERN NEW		
10/16/2020 NORTHEAST	ENGLAND	94.70%	97.29%
	NORTHERN NEW		
10/16/2020 NORTHEAST	JERSEY	94.64%	87.24%
10/16/2020 NORTHEAST	TRIBORO	95.11%	90.96%
10/16/2020 NORTHEAST	WESTCHESTER	90.75%	93.82%
10/16/2020 PACIFIC	BAY-VALLEY	96.99%	96.92%

10/16/2020 PACIFIC	HONOLULU	94.19%	75.52%
10/16/2020 PACIFIC	LOS ANGELES	97.50%	96.50%
10/16/2020 PACIFIC	SACRAMENTO	95.31%	95.70%
10/16/2020 PACIFIC	SAN DIEGO	96.56%	96.27%
10/16/2020 PACIFIC	SAN FRANCISCO	96.55%	98.11%
10/16/2020 PACIFIC	SANTA ANA	96.11%	98.14%
10/16/2020 PACIFIC	SIERRA COASTAL	95.43%	97.98%
10/16/2020 SOUTHERN	ALABAMA	88.70%	89.95%
10/16/2020 SOUTHERN	ARKANSAS	94.92%	96.73%
10/16/2020 SOUTHERN	DALLAS	94.97%	96.26%
10/16/2020 SOUTHERN	FT WORTH	94.25%	97.77%
10/16/2020 SOUTHERN	GULF ATLANTIC	91.39%	91.36%
10/16/2020 SOUTHERN	HOUSTON	96.00%	97.29%
10/16/2020 SOUTHERN	LOUISIANA	95.31%	95.07%
10/16/2020 SOUTHERN	MISSISSIPPI	88.48%	87.72%
10/16/2020 SOUTHERN	OKLAHOMA	95.23%	97.30%
10/16/2020 SOUTHERN	RIO GRANDE	95.28%	97.69%
10/16/2020 SOUTHERN	SOUTH FLORIDA	94.56%	91.66%
10/16/2020 SOUTHERN	SUNCOAST	94.35%	96.85%
10/16/2020 WESTERN	ALASKA	95.88%	97.28%
10/16/2020 WESTERN	ARIZONA	96.16%	90.31%
10/16/2020 WESTERN	CENTRAL PLAINS	98.04%	95.51%
10/16/2020 WESTERN	COLORADO/WYOMIN	83.31%	86.80%
10/16/2020 WESTERN	DAKOTAS	95.57%	96.63%
10/16/2020 WESTERN	HAWKEYE	93.77%	96.27%
10/16/2020 WESTERN	MID-AMERICA	93.86%	95.32%
10/16/2020 WESTERN	NEVADA SIERRA	97.40%	97.70%
10/16/2020 WESTERN	NORTHLAND	94.02%	95.15%
10/16/2020 WESTERN	PORTLAND	96.21%	97.36%
10/16/2020 WESTERN	SALT LAKE CITY	96.98%	95.06%
10/16/2020 WESTERN	SEATTLE	96.03%	98.43%
10/17/2020 CAPITAL METRO	ATLANTA	81.29%	50.86%
10/17/2020 CAPITAL METRO	BALTIMORE	59.66%	85.95%
10/17/2020 CAPITAL METRO	CAPITAL	68.27%	95.18%
10/17/2020 CAPITAL METRO	GREATER S CAROLINA	77.30%	92.98%
10/17/2020 CAPITAL METRO	GREENSBORO	69.53%	73.95%
10/17/2020 CAPITAL METRO	MID-CAROLINAS	86.84%	88.32%
10/17/2020 CAPITAL METRO	NORTHERN VIRGINIA	74.07%	92.86%
10/17/2020 CAPITAL METRO	RICHMOND	84.34%	89.36%
10/17/2020 EASTERN	APPALACHIAN	86.33%	95.67%
	CENTRAL		
10/17/2020 EASTERN	PENNSYLVANIA	74.53%	60.13%
10/17/2020 EASTERN	KENTUCKIANA	84.87%	93.41%
10/17/2020 EASTERN	NORTHERN OHIO	80.74%	73.12%
10/17/2020 EASTERN	OHIO VALLEY	82.48%	92.23%
	PHILADELPHIA		
10/17/2020 EASTERN	METROPO	72.57%	72.45%

10/17/2020 EASTERN	SOUTH JERSEY	77.99%	84.11%
10/17/2020 EASTERN	TENNESSEE	84.07%	87.64%
10/17/2020 EASTERN	WESTERN NEW YORK	89.56%	84.62%
	WESTERN		
10/17/2020 EASTERN	PENNSYLVANIA	84.94%	96.58%
10/17/2020 GREAT LAKES	CENTRAL ILLINOIS	83.28%	84.90%
10/17/2020 GREAT LAKES	CHICAGO	88.50%	95.72%
10/17/2020 GREAT LAKES	DETROIT	74.72%	76.59%
10/17/2020 GREAT LAKES	GATEWAY	86.75%	89.73%
10/17/2020 GREAT LAKES	GREATER INDIANA	91.69%	91.43%
10/17/2020 GREAT LAKES	GREATER MICHIGAN	85.24%	93.74%
10/17/2020 GREAT LAKES	LAKELAND	87.95%	92.68%
10/17/2020 NORTHEAST	ALBANY	89.63%	96.07%
10/17/2020 NORTHEAST	CARIBBEAN	94.85%	98.12%
10/17/2020 NORTHEAST	CONNECTICUT VALLEY	86.87%	94.55%
10/17/2020 NORTHEAST	GREATER BOSTON	88.47%	91.29%
10/17/2020 NORTHEAST	LONG ISLAND	84.41%	90.09%
10/17/2020 NORTHEAST	NEW YORK	86.72%	95.43%
	NORTHERN NEW		
10/17/2020 NORTHEAST	ENGLAND	88.26%	95.37%
	NORTHERN NEW		
10/17/2020 NORTHEAST	JERSEY	88.54%	89.32%
10/17/2020 NORTHEAST	TRIBORO	84.69%	89.09%
10/17/2020 NORTHEAST	WESTCHESTER	86.69%	92.98%
10/17/2020 PACIFIC	BAY-VALLEY	90.79%	94.89%
10/17/2020 PACIFIC	HONOLULU	97.07%	85.78%
10/17/2020 PACIFIC	LOS ANGELES	94.43%	94.54%
10/17/2020 PACIFIC	SACRAMENTO	91.06%	94.68%
10/17/2020 PACIFIC	SAN DIEGO	91.36%	93.26%
10/17/2020 PACIFIC	SAN FRANCISCO	92.98%	94.78%
10/17/2020 PACIFIC	SANTA ANA	90.07%	97.78%
10/17/2020 PACIFIC	SIERRA COASTAL	89.69%	95.27%
10/17/2020 SOUTHERN	ALABAMA	78.21%	86.43%
10/17/2020 SOUTHERN	ARKANSAS	90.11%	94.35%
10/17/2020 SOUTHERN	DALLAS	86.84%	94.27%
10/17/2020 SOUTHERN	FT WORTH	85.83%	92.12%
10/17/2020 SOUTHERN	GULF ATLANTIC	80.85%	90.38%
10/17/2020 SOUTHERN	HOUSTON	86.99%	93.25%
10/17/2020 SOUTHERN	LOUISIANA	88.59%	93.30%
10/17/2020 SOUTHERN	MISSISSIPPI	69.71%	86.10%
10/17/2020 SOUTHERN	OKLAHOMA	89.06%	94.71%
10/17/2020 SOUTHERN	RIO GRANDE	85.94%	95.75%
10/17/2020 SOUTHERN	SOUTH FLORIDA	86.42%	89.90%
10/17/2020 SOUTHERN	SUNCOAST	84.42%	84.89%
10/17/2020 WESTERN	ALASKA	91.06%	96.00%
10/17/2020 WESTERN	ARIZONA	86.96%	80.98%
10/17/2020 WESTERN	CENTRAL PLAINS	90.90%	95.84%

10/17/2020 WESTERN	COLORADO/WYOMIN	76.36%	62.92%
10/17/2020 WESTERN	DAKOTAS	91.67%	96.99%
10/17/2020 WESTERN	HAWKEYE	85.66%	93.99%
10/17/2020 WESTERN	MID-AMERICA	85.94%	84.22%
10/17/2020 WESTERN	NEVADA SIERRA	89.38%	95.98%
10/17/2020 WESTERN	NORTHLAND	85.80%	93.95%
10/17/2020 WESTERN	PORTLAND	88.34%	92.56%
10/17/2020 WESTERN	SALT LAKE CITY	88.32%	93.68%
10/17/2020 WESTERN	SEATTLE	83.26%	92.30%
10/19/2020 CAPITAL METRO	ATLANTA	87.81%	46.01%
10/19/2020 CAPITAL METRO	BALTIMORE	63.32%	75.17%
10/19/2020 CAPITAL METRO	CAPITAL	79.00%	94.93%
10/19/2020 CAPITAL METRO	GREATER S CAROLINA	80.18%	90.34%
10/19/2020 CAPITAL METRO	GREENSBORO	75.95%	65.66%
10/19/2020 CAPITAL METRO	MID-CAROLINAS	87.82%	90.52%
10/19/2020 CAPITAL METRO	NORTHERN VIRGINIA	85.52%	93.36%
10/19/2020 CAPITAL METRO	RICHMOND	88.32%	88.04%
10/19/2020 EASTERN	APPALACHIAN	85.99%	94.63%
	CENTRAL		
10/19/2020 EASTERN	PENNSYLVANIA	76.86%	87.60%
10/19/2020 EASTERN	KENTUCKIANA	85.27%	90.72%
10/19/2020 EASTERN	NORTHERN OHIO	84.28%	72.31%
10/19/2020 EASTERN	OHIO VALLEY	81.49%	76.15%
	PHILADELPHIA		
10/19/2020 EASTERN	METROPO	69.33%	60.98%
10/19/2020 EASTERN	SOUTH JERSEY	84.66%	85.97%
10/19/2020 EASTERN	TENNESSEE	87.22%	90.37%
10/19/2020 EASTERN	WESTERN NEW YORK	89.57%	92.28%
	WESTERN		
10/19/2020 EASTERN	PENNSYLVANIA	89.74%	95.42%
10/19/2020 GREAT LAKES	CENTRAL ILLINOIS	88.76%	80.57%
10/19/2020 GREAT LAKES	CHICAGO	92.71%	87.78%
10/19/2020 GREAT LAKES	DETROIT	77.98%	76.28%
10/19/2020 GREAT LAKES	GATEWAY	88.33%	90.81%
10/19/2020 GREAT LAKES	GREATER INDIANA	92.96%	92.62%
10/19/2020 GREAT LAKES	GREATER MICHIGAN	87.24%	87.46%
10/19/2020 GREAT LAKES	LAKELAND	90.17%	94.05%
10/19/2020 NORTHEAST	ALBANY	89.66%	95.98%
10/19/2020 NORTHEAST	CARIBBEAN	95.73%	95.45%
10/19/2020 NORTHEAST	CONNECTICUT VALLEY	90.26%	95.35%
10/19/2020 NORTHEAST	GREATER BOSTON	91.05%	90.97%
10/19/2020 NORTHEAST	LONG ISLAND	88.23%	89.11%
10/19/2020 NORTHEAST	NEW YORK	89.95%	96.99%
	NORTHERN NEW		
10/19/2020 NORTHEAST	ENGLAND	90.10%	93.25%
	NORTHERN NEW		
10/19/2020 NORTHEAST	JERSEY	90.16%	89.81%

10/19/2020 NORTHEAST	TRIBORO	93.24%	93.96%
10/19/2020 NORTHEAST	WESTCHESTER	89.10%	89.10%
10/19/2020 PACIFIC	BAY-VALLEY	93.27%	95.82%
10/19/2020 PACIFIC	HONOLULU	93.67%	68.67%
10/19/2020 PACIFIC	LOS ANGELES	93.84%	96.34%
10/19/2020 PACIFIC	SACRAMENTO	93.14%	90.89%
10/19/2020 PACIFIC	SAN DIEGO	93.30%	95.54%
10/19/2020 PACIFIC	SAN FRANCISCO	94.32%	96.77%
10/19/2020 PACIFIC	SANTA ANA	94.85%	97.66%
10/19/2020 PACIFIC	SIERRA COASTAL	93.45%	97.11%
10/19/2020 SOUTHERN	ALABAMA	80.75%	81.23%
10/19/2020 SOUTHERN	ARKANSAS	91.39%	93.03%
10/19/2020 SOUTHERN	DALLAS	91.38%	95.26%
10/19/2020 SOUTHERN	FT WORTH	90.15%	94.39%
10/19/2020 SOUTHERN	GULF ATLANTIC	83.88%	90.74%
10/19/2020 SOUTHERN	HOUSTON	89.58%	95.82%
10/19/2020 SOUTHERN	LOUISIANA	89.19%	91.45%
10/19/2020 SOUTHERN	MISSISSIPPI	81.61%	88.45%
10/19/2020 SOUTHERN	OKLAHOMA	94.47%	96.14%
10/19/2020 SOUTHERN	RIO GRANDE	92.47%	94.29%
10/19/2020 SOUTHERN	SOUTH FLORIDA	89.54%	91.63%
10/19/2020 SOUTHERN	SUNCOAST	89.63%	94.43%
10/19/2020 WESTERN	ALASKA	90.91%	94.39%
10/19/2020 WESTERN	ARIZONA	84.91%	84.78%
10/19/2020 WESTERN	CENTRAL PLAINS	93.28%	93.31%
10/19/2020 WESTERN	COLORADO/WYOMIN	77.99%	66.79%
10/19/2020 WESTERN	DAKOTAS	91.17%	94.11%
10/19/2020 WESTERN	HAWKEYE	89.44%	94.21%
10/19/2020 WESTERN	MID-AMERICA	86.69%	88.30%
10/19/2020 WESTERN	NEVADA SIERRA	87.49%	93.63%
10/19/2020 WESTERN	NORTHLAND	82.90%	88.40%
10/19/2020 WESTERN	PORTLAND	88.20%	95.25%
10/19/2020 WESTERN	SALT LAKE CITY	91.18%	93.71%
10/19/2020 WESTERN	SEATTLE	86.18%	93.14%
10/20/2020 CAPITAL METRO	ATLANTA	53.66%	70.17%
10/20/2020 CAPITAL METRO	BALTIMORE	37.22%	80.69%
10/20/2020 CAPITAL METRO	CAPITAL	48.08%	97.76%
10/20/2020 CAPITAL METRO	GREATER S CAROLINA	44.65%	96.54%
10/20/2020 CAPITAL METRO	GREENSBORO	32.89%	71.80%
10/20/2020 CAPITAL METRO	MID-CAROLINAS	64.17%	88.71%
10/20/2020 CAPITAL METRO	NORTHERN VIRGINIA	57.87%	96.33%
10/20/2020 CAPITAL METRO	RICHMOND	67.00%	93.90%
10/20/2020 EASTERN	APPALACHIAN	63.65%	95.88%
	CENTRAL		
10/20/2020 EASTERN	PENNSYLVANIA	45.07%	78.16%
10/20/2020 EASTERN	KENTUCKIANA	65.86%	96.85%
10/20/2020 EASTERN	NORTHERN OHIO	51.68%	79.45%



10/20/2020 EASTERN	OHIO VALLEY	45.53%	91.32%
	PHILADELPHIA		
10/20/2020 EASTERN	METROPO	35.75%	83.88%
10/20/2020 EASTERN	SOUTH JERSEY	36.73%	94.99%
10/20/2020 EASTERN	TENNESSEE	59.64%	93.56%
10/20/2020 EASTERN	WESTERN NEW YORK	64.96%	94.47%
	WESTERN		
10/20/2020 EASTERN	PENNSYLVANIA	65.05%	96.00%
10/20/2020 GREAT LAKES	CENTRAL ILLINOIS	57.89%	88.64%
10/20/2020 GREAT LAKES	CHICAGO	51.53%	94.20%
10/20/2020 GREAT LAKES	DETROIT	43.98%	81.42%
10/20/2020 GREAT LAKES	GATEWAY	57.42%	90.65%
10/20/2020 GREAT LAKES	GREATER INDIANA	68.93%	93.87%
10/20/2020 GREAT LAKES	GREATER MICHIGAN	59.46%	89.78%
10/20/2020 GREAT LAKES	LAKELAND	52.07%	95.22%
10/20/2020 NORTHEAST	ALBANY	65.01%	97.77%
10/20/2020 NORTHEAST	CARIBBEAN	85.97%	65.57%
10/20/2020 NORTHEAST	CONNECTICUT VALLEY	79.84%	96.90%
10/20/2020 NORTHEAST	GREATER BOSTON	65.66%	93.72%
10/20/2020 NORTHEAST	LONG ISLAND	68.51%	97.07%
10/20/2020 NORTHEAST	NEW YORK	74.16%	96.86%
	NORTHERN NEW		
10/20/2020 NORTHEAST	ENGLAND	73.69%	95.31%
	NORTHERN NEW		
10/20/2020 NORTHEAST	JERSEY	67.38%	95.92%
10/20/2020 NORTHEAST	TRIBORO	79.15%	92.88%
10/20/2020 NORTHEAST	WESTCHESTER	62.84%	94.99%
10/20/2020 PACIFIC	BAY-VALLEY	66.35%	93.81%
10/20/2020 PACIFIC	HONOLULU	62.22%	60.92%
10/20/2020 PACIFIC	LOS ANGELES	78.02%	96.13%
10/20/2020 PACIFIC	SACRAMENTO	75.82%	93.55%
10/20/2020 PACIFIC	SAN DIEGO	69.77%	95.96%
10/20/2020 PACIFIC	SAN FRANCISCO	70.92%	97.55%
10/20/2020 PACIFIC	SANTA ANA	47.91%	99.09%
10/20/2020 PACIFIC	SIERRA COASTAL	63.86%	97.61%
10/20/2020 SOUTHERN	ALABAMA	49.63%	85.01%
10/20/2020 SOUTHERN	ARKANSAS	67.05%	96.12%
10/20/2020 SOUTHERN	DALLAS	71.55%	94.59%
10/20/2020 SOUTHERN	FT WORTH	57.51%	94.33%
10/20/2020 SOUTHERN	GULF ATLANTIC	52.98%	89.35%
10/20/2020 SOUTHERN	HOUSTON	67.82%	95.90%
10/20/2020 SOUTHERN	LOUISIANA	62.72%	89.06%
10/20/2020 SOUTHERN	MISSISSIPPI	43.62%	81.33%
10/20/2020 SOUTHERN	OKLAHOMA	64.86%	97.18%
10/20/2020 SOUTHERN	RIO GRANDE	70.64%	95.46%
10/20/2020 SOUTHERN	SOUTH FLORIDA	64.33%	89.75%
10/20/2020 SOUTHERN	SUNCOAST	61.26%	94.66%

10/20/2020 WESTERN	ALASKA	68.84%	95.31%
10/20/2020 WESTERN	ARIZONA	60.49%	83.99%
10/20/2020 WESTERN	CENTRAL PLAINS	76.81%	94.89%
10/20/2020 WESTERN	COLORADO/WYOMIN	50.13%	50.54%
10/20/2020 WESTERN	DAKOTAS	69.99%	92.37%
10/20/2020 WESTERN	HAWKEYE	65.05%	91.66%
10/20/2020 WESTERN	MID-AMERICA	50.97%	87.78%
10/20/2020 WESTERN	NEVADA SIERRA	77.90%	95.95%
10/20/2020 WESTERN	NORTHLAND	59.09%	93.44%
10/20/2020 WESTERN	PORTLAND	62.87%	90.42%
10/20/2020 WESTERN	SALT LAKE CITY	68.41%	94.62%
10/20/2020 WESTERN	SEATTLE	58.64%	91.87%
10/21/2020 CAPITAL METRO	ATLANTA	66.93%	64.88%
10/21/2020 CAPITAL METRO	BALTIMORE	50.88%	85.74%
10/21/2020 CAPITAL METRO	CAPITAL	60.99%	92.41%
10/21/2020 CAPITAL METRO	GREATER S CAROLINA	68.24%	87.57%
10/21/2020 CAPITAL METRO	GREENSBORO	49.12%	54.73%
10/21/2020 CAPITAL METRO	MID-CAROLINAS	62.27%	81.36%
10/21/2020 CAPITAL METRO	NORTHERN VIRGINIA	72.35%	93.92%
10/21/2020 CAPITAL METRO	RICHMOND	81.41%	91.93%
10/21/2020 EASTERN	APPALACHIAN	86.01%	96.36%
	CENTRAL		
10/21/2020 EASTERN	PENNSYLVANIA	61.78%	75.38%
10/21/2020 EASTERN	KENTUCKIANA	76.61%	91.78%
10/21/2020 EASTERN	NORTHERN OHIO	68.77%	56.31%
10/21/2020 EASTERN	OHIO VALLEY	74.53%	86.91%
	PHILADELPHIA		
10/21/2020 EASTERN	METROPO	47.44%	52.98%
10/21/2020 EASTERN	SOUTH JERSEY	66.75%	94.18%
10/21/2020 EASTERN	TENNESSEE	81.44%	93.16%
10/21/2020 EASTERN	WESTERN NEW YORK	89.68%	94.63%
	WESTERN		
10/21/2020 EASTERN	PENNSYLVANIA	79.27%	94.35%
10/21/2020 GREAT LAKES	CENTRAL ILLINOIS	68.95%	82.65%
10/21/2020 GREAT LAKES	CHICAGO	70.61%	76.48%
10/21/2020 GREAT LAKES	DETROIT	45.30%	79.23%
10/21/2020 GREAT LAKES	GATEWAY	77.10%	91.03%
10/21/2020 GREAT LAKES	GREATER INDIANA	83.51%	94.30%
10/21/2020 GREAT LAKES	GREATER MICHIGAN	80.69%	95.45%
10/21/2020 GREAT LAKES	LAKELAND	79.40%	92.98%
10/21/2020 NORTHEAST	ALBANY	87.13%	96.18%
10/21/2020 NORTHEAST	CARIBBEAN	97.53%	86.86%
10/21/2020 NORTHEAST	CONNECTICUT VALLEY	81.08%	95.31%
10/21/2020 NORTHEAST	GREATER BOSTON	85.58%	92.48%
10/21/2020 NORTHEAST	LONG ISLAND	82.79%	94.23%
10/21/2020 NORTHEAST	NEW YORK	77.74%	97.80%

	NORTHERN NEW		
10/21/2020 NORTHEAST	ENGLAND	78.25%	95.49%
	NORTHERN NEW		
10/21/2020 NORTHEAST	JERSEY	84.35%	91.40%
10/21/2020 NORTHEAST	TRIBORO	82.16%	92.90%
10/21/2020 NORTHEAST	WESTCHESTER	83.95%	95.20%
10/21/2020 PACIFIC	BAY-VALLEY	80.57%	97.58%
10/21/2020 PACIFIC	HONOLULU	87.77%	84.74%
10/21/2020 PACIFIC	LOS ANGELES	77.43%	97.73%
10/21/2020 PACIFIC	SACRAMENTO	83.39%	95.17%
10/21/2020 PACIFIC	SAN DIEGO	83.00%	95.42%
10/21/2020 PACIFIC	SAN FRANCISCO	69.05%	98.59%
10/21/2020 PACIFIC	SANTA ANA	82.93%	97.54%
10/21/2020 PACIFIC	SIERRA COASTAL	80.92%	97.22%
10/21/2020 SOUTHERN	ALABAMA	78.50%	89.93%
10/21/2020 SOUTHERN	ARKANSAS	87.86%	94.98%
10/21/2020 SOUTHERN	DALLAS	64.58%	93.87%
10/21/2020 SOUTHERN	FT WORTH	84.89%	85.05%
10/21/2020 SOUTHERN	GULF ATLANTIC	63.93%	87.16%
10/21/2020 SOUTHERN	HOUSTON	75.36%	96.15%
10/21/2020 SOUTHERN	LOUISIANA	86.21%	89.48%
10/21/2020 SOUTHERN	MISSISSIPPI	66.13%	90.69%
10/21/2020 SOUTHERN	OKLAHOMA	91.08%	96.63%
10/21/2020 SOUTHERN	RIO GRANDE	83.25%	96.38%
10/21/2020 SOUTHERN	SOUTH FLORIDA	54.61%	88.92%
10/21/2020 SOUTHERN	SUNCOAST	72.61%	87.24%
10/21/2020 WESTERN	ALASKA	81.16%	98.38%
10/21/2020 WESTERN	ARIZONA	75.89%	85.48%
10/21/2020 WESTERN	CENTRAL PLAINS	84.08%	94.19%
10/21/2020 WESTERN	COLORADO/WYOMIN	62.45%	79.24%
10/21/2020 WESTERN	DAKOTAS	88.16%	92.06%
10/21/2020 WESTERN	HAWKEYE	85.90%	91.57%
10/21/2020 WESTERN	MID-AMERICA	82.03%	84.81%
10/21/2020 WESTERN	NEVADA SIERRA	84.17%	97.06%
10/21/2020 WESTERN	NORTHLAND	78.89%	87.11%
10/21/2020 WESTERN	PORTLAND	86.19%	94.94%
10/21/2020 WESTERN	SALT LAKE CITY	78.47%	93.49%
10/21/2020 WESTERN	SEATTLE	75.81%	93.91%
10/22/2020 CAPITAL METRO	ATLANTA	90.46%	64.27%
10/22/2020 CAPITAL METRO	BALTIMORE	59.18%	74.72%
10/22/2020 CAPITAL METRO	CAPITAL	73.81%	89.26%
10/22/2020 CAPITAL METRO	GREATER S CAROLINA	78.79%	81.81%
10/22/2020 CAPITAL METRO	GREENSBORO	72.63%	42.82%
10/22/2020 CAPITAL METRO	MID-CAROLINAS	88.93%	83.55%
10/22/2020 CAPITAL METRO	NORTHERN VIRGINIA	89.08%	90.94%
10/22/2020 CAPITAL METRO	RICHMOND	90.97%	91.68%
10/22/2020 EASTERN	APPALACHIAN	89.08%	92.73%

	CENTRAL		
10/22/2020 EASTERN	PENNSYLVANIA	75.00%	67.45%
10/22/2020 EASTERN	KENTUCKIANA	90.71%	96.26%
10/22/2020 EASTERN	NORTHERN OHIO	84.89%	76.33%
10/22/2020 EASTERN	OHIO VALLEY	85.95%	88.17%
	PHILADELPHIA		
10/22/2020 EASTERN	METROPO	60.81%	56.16%
10/22/2020 EASTERN	SOUTH JERSEY	81.73%	89.47%
10/22/2020 EASTERN	TENNESSEE	92.36%	91.99%
10/22/2020 EASTERN	WESTERN NEW YORK	93.02%	87.80%
	WESTERN		
10/22/2020 EASTERN	PENNSYLVANIA	89.28%	95.60%
10/22/2020 GREAT LAKES	CENTRAL ILLINOIS	84.26%	83.34%
10/22/2020 GREAT LAKES	CHICAGO	87.56%	91.66%
10/22/2020 GREAT LAKES	DETROIT	74.10%	78.14%
10/22/2020 GREAT LAKES	GATEWAY	92.21%	91.83%
10/22/2020 GREAT LAKES	GREATER INDIANA	93.39%	92.15%
10/22/2020 GREAT LAKES	GREATER MICHIGAN	88.35%	89.92%
10/22/2020 GREAT LAKES	LAKELAND	90.28%	95.14%
10/22/2020 NORTHEAST	ALBANY	92.27%	95.05%
10/22/2020 NORTHEAST	CARIBBEAN	95.08%	88.33%
10/22/2020 NORTHEAST	CONNECTICUT VALLEY	92.16%	94.66%
10/22/2020 NORTHEAST	GREATER BOSTON	87.20%	91.95%
10/22/2020 NORTHEAST	LONG ISLAND	89.29%	95.72%
10/22/2020 NORTHEAST	NEW YORK	90.71%	96.56%
	NORTHERN NEW		
10/22/2020 NORTHEAST	ENGLAND	90.86%	92.12%
	NORTHERN NEW		
10/22/2020 NORTHEAST	JERSEY	93.41%	92.69%
10/22/2020 NORTHEAST	TRIBORO	93.19%	90.17%
10/22/2020 NORTHEAST	WESTCHESTER	93.15%	91.62%
10/22/2020 PACIFIC	BAY-VALLEY	83.43%	97.57%
10/22/2020 PACIFIC	HONOLULU	85.98%	88.43%
10/22/2020 PACIFIC	LOS ANGELES	94.27%	97.16%
10/22/2020 PACIFIC	SACRAMENTO	93.69%	94.37%
10/22/2020 PACIFIC	SAN DIEGO	95.08%	97.22%
10/22/2020 PACIFIC	SAN FRANCISCO	86.07%	96.62%
10/22/2020 PACIFIC	SANTA ANA	94.83%	97.49%
10/22/2020 PACIFIC	SIERRA COASTAL	88.89%	97.96%
10/22/2020 SOUTHERN	ALABAMA	87.74%	88.53%
10/22/2020 SOUTHERN	ARKANSAS	92.45%	90.37%
10/22/2020 SOUTHERN	DALLAS	91.12%	92.59%
10/22/2020 SOUTHERN	FT WORTH	92.36%	86.29%
10/22/2020 SOUTHERN	GULF ATLANTIC	85.04%	86.07%
10/22/2020 SOUTHERN	HOUSTON	93.07%	94.40%
10/22/2020 SOUTHERN	LOUISIANA	91.06%	91.39%
10/22/2020 SOUTHERN	MISSISSIPPI	85.46%	90.49%

10/22/2020 SOUTHERN	OKLAHOMA	94.45%	94.20%
10/22/2020 SOUTHERN	RIO GRANDE	88.24%	91.44%
10/22/2020 SOUTHERN	SOUTH FLORIDA	82.42%	88.38%
10/22/2020 SOUTHERN	SUNCOAST	90.25%	89.61%
10/22/2020 WESTERN	ALASKA	93.24%	96.89%
10/22/2020 WESTERN	ARIZONA	89.50%	83.39%
10/22/2020 WESTERN	CENTRAL PLAINS	94.77%	94.43%
10/22/2020 WESTERN	COLORADO/WYOMIN	82.73%	83.73%
10/22/2020 WESTERN	DAKOTAS	94.22%	94.43%
10/22/2020 WESTERN	HAWKEYE	92.20%	95.99%
10/22/2020 WESTERN	MID-AMERICA	91.96%	92.36%
10/22/2020 WESTERN	NEVADA SIERRA	89.33%	96.88%
10/22/2020 WESTERN	NORTHLAND	91.99%	89.32%
10/22/2020 WESTERN	PORTLAND	85.02%	96.21%
10/22/2020 WESTERN	SALT LAKE CITY	94.60%	93.81%
10/22/2020 WESTERN	SEATTLE	86.88%	97.02%
10/23/2020 CAPITAL METRO	ATLANTA	88.03%	64.82%
10/23/2020 CAPITAL METRO	BALTIMORE	54.34%	65.37%
10/23/2020 CAPITAL METRO	CAPITAL	75.36%	93.48%
10/23/2020 CAPITAL METRO	GREATER S CAROLINA	78.99%	79.80%
10/23/2020 CAPITAL METRO	GREENSBORO	74.08%	61.88%
10/23/2020 CAPITAL METRO	MID-CAROLINAS	88.27%	89.94%
10/23/2020 CAPITAL METRO	NORTHERN VIRGINIA	84.38%	93.00%
10/23/2020 CAPITAL METRO	RICHMOND	77.80%	85.70%
10/23/2020 EASTERN	APPALACHIAN	90.53%	92.89%
	CENTRAL		
10/23/2020 EASTERN	PENNSYLVANIA	74.44%	54.55%
10/23/2020 EASTERN	KENTUCKIANA	90.27%	95.94%
10/23/2020 EASTERN	NORTHERN OHIO	84.59%	64.03%
10/23/2020 EASTERN	OHIO VALLEY	89.21%	72.39%
	PHILADELPHIA		
10/23/2020 EASTERN	METROPO	66.41%	69.36%
10/23/2020 EASTERN	SOUTH JERSEY	81.99%	88.88%
10/23/2020 EASTERN	TENNESSEE	86.55%	84.92%
10/23/2020 EASTERN	WESTERN NEW YORK	91.64%	93.80%
	WESTERN		
10/23/2020 EASTERN	PENNSYLVANIA	87.86%	97.11%
10/23/2020 GREAT LAKES	CENTRAL ILLINOIS	83.17%	87.04%
10/23/2020 GREAT LAKES	CHICAGO	89.62%	90.15%
10/23/2020 GREAT LAKES	DETROIT	78.42%	74.14%
10/23/2020 GREAT LAKES	GATEWAY	90.51%	90.17%
10/23/2020 GREAT LAKES	GREATER INDIANA	94.89%	90.05%
10/23/2020 GREAT LAKES	GREATER MICHIGAN	89.97%	91.14%
10/23/2020 GREAT LAKES	LAKELAND	91.27%	93.55%
10/23/2020 NORTHEAST	ALBANY	89.81%	96.81%
10/23/2020 NORTHEAST	CARIBBEAN	94.22%	88.87%
10/23/2020 NORTHEAST	CONNECTICUT VALLEY	92.92%	94.71%

10/23/2020 NORTHEAST	GREATER BOSTON	90.13%	93.70%
10/23/2020 NORTHEAST	LONG ISLAND	90.93%	93.05%
10/23/2020 NORTHEAST	NEW YORK	87.99%	98.40%
	NORTHERN NEW		
10/23/2020 NORTHEAST	ENGLAND	91.81%	96.35%
	NORTHERN NEW		
10/23/2020 NORTHEAST	JERSEY	91.89%	90.96%
10/23/2020 NORTHEAST	TRIBORO	91.07%	95.17%
10/23/2020 NORTHEAST	WESTCHESTER	89.57%	80.23%
10/23/2020 PACIFIC	BAY-VALLEY	89.79%	95.62%
10/23/2020 PACIFIC	HONOLULU	85.70%	86.71%
10/23/2020 PACIFIC	LOS ANGELES	95.18%	94.76%
10/23/2020 PACIFIC	SACRAMENTO	91.10%	92.81%
10/23/2020 PACIFIC	SAN DIEGO	92.40%	93.59%
10/23/2020 PACIFIC	SAN FRANCISCO	91.79%	97.06%
10/23/2020 PACIFIC	SANTA ANA	92.85%	97.31%
10/23/2020 PACIFIC	SIERRA COASTAL	91.33%	97.27%
10/23/2020 SOUTHERN	ALABAMA	87.68%	73.36%
10/23/2020 SOUTHERN	ARKANSAS	93.10%	88.25%
10/23/2020 SOUTHERN	DALLAS	90.57%	90.80%
10/23/2020 SOUTHERN	FT WORTH	85.33%	79.81%
10/23/2020 SOUTHERN	GULF ATLANTIC	81.66%	84.34%
10/23/2020 SOUTHERN	HOUSTON	90.95%	93.16%
10/23/2020 SOUTHERN	LOUISIANA	91.76%	81.32%
10/23/2020 SOUTHERN	MISSISSIPPI	88.63%	86.87%
10/23/2020 SOUTHERN	OKLAHOMA	92.82%	91.14%
10/23/2020 SOUTHERN	RIO GRANDE	89.60%	73.80%
10/23/2020 SOUTHERN	SOUTH FLORIDA	86.91%	92.34%
10/23/2020 SOUTHERN	SUNCOAST	87.98%	84.37%
10/23/2020 WESTERN	ALASKA	86.08%	94.57%
10/23/2020 WESTERN	ARIZONA	91.56%	91.21%
10/23/2020 WESTERN	CENTRAL PLAINS	91.02%	87.74%
10/23/2020 WESTERN	COLORADO/WYOMIN	84.69%	86.01%
10/23/2020 WESTERN	DAKOTAS	94.14%	95.15%
10/23/2020 WESTERN	HAWKEYE	92.20%	95.95%
10/23/2020 WESTERN	MID-AMERICA	88.99%	85.22%
10/23/2020 WESTERN	NEVADA SIERRA	92.34%	97.59%
10/23/2020 WESTERN	NORTHLAND	89.69%	93.40%
10/23/2020 WESTERN	PORTLAND	87.37%	93.81%
10/23/2020 WESTERN	SALT LAKE CITY	92.96%	93.90%
10/23/2020 WESTERN	SEATTLE	88.05%	93.89%
10/24/2020 Capital Metro	Atlanta	83.93%	71.02%
10/24/2020 Capital Metro	Baltimore	62.21%	73.94%
10/24/2020 Capital Metro	Capital	76.25%	94.04%
10/24/2020 Capital Metro	Greater S Carolina	77.70%	86.72%
10/24/2020 Capital Metro	Greensboro	77.05%	66.67%
10/24/2020 Capital Metro	Mid-Carolinas	85.18%	88.26%

10/24/2020 Capital Metro	Norther Virginia	83.75%	94.71%
10/24/2020 Capital Metro	Richmond	82.28%	87.12%
10/24/2020 Eastern	Appalachian	90.08%	94.79%
10/24/2020 Eastern	Central Pennsylvania	69.20%	59.03%
10/24/2020 Eastern	Kentuckiana	89.71%	96.47%
10/24/2020 Eastern	Norther Ohio	80.89%	74.11%
10/24/2020 Eastern	Ohio Valley	83.40%	83.62%
10/24/2020 Eastern	Philadelphia Metropo	57.31%	74.95%
10/24/2020 Eastern	South Jersey	80.23%	89.84%
10/24/2020 Eastern	Tennessee	86.42%	89.67%
10/24/2020 Eastern	Western New York	90.25%	94.05%
10/24/2020 Eastern	Western Pennsylvania	87.06%	97.74%
10/24/2020 Great Lakes	Central Illinois	84.58%	85.77%
10/24/2020 Great Lakes	Chicago	90.55%	89.75%
10/24/2020 Great Lakes	Detroit	71.65%	84.85%
10/24/2020 Great Lakes	Gateway	88.19%	92.59%
10/24/2020 Great Lakes	Greater Indiana	93.11%	94.04%
10/24/2020 Great Lakes	Greater Michigan	87.43%	92.48%
10/24/2020 Great Lakes	Lakeland	86.59%	93.34%
10/24/2020 Northeast	Albany	88.06%	94.79%
10/24/2020 Northeast	Caribbean	97.13%	96.11%
10/24/2020 Northeast	Connecticut Valley	91.26%	94.78%
10/24/2020 Northeast	Greater Boston	89.56%	86.00%
10/24/2020 Northeast	Long Island	90.57%	94.14%
10/24/2020 Northeast	New York	88.92%	97.80%
10/24/2020 Northeast	Northern New England	90.69%	95.62%
10/24/2020 Northeast	Northern New Jersey	88.11%	92.37%
10/24/2020 Northeast	Triboro	92.38%	95.28%
10/24/2020 Northeast	Westchester	89.15%	84.08%
10/24/2020 Pacific	Bay-Valley	93.30%	96.78%
10/24/2020 Pacific	Honolulu	90.95%	85.65%
10/24/2020 Pacific	Los Angeles	89.85%	95.67%
10/24/2020 Pacific	Sacramento	94.54%	92.33%
10/24/2020 Pacific	San Diego	92.49%	96.31%
10/24/2020 Pacific	San Francisco	94.30%	98.62%
10/24/2020 Pacific	Santa Ana	92.28%	97.37%
10/24/2020 Pacific	Sierra Coastal	91.59%	97.12%
10/24/2020 Southern	Alabama	81.33%	80.49%
10/24/2020 Southern	Arkansas	89.42%	93.55%
10/24/2020 Southern	Dallas	91.42%	94.61%
10/24/2020 Southern	Ft. Worth	87.41%	87.70%
10/24/2020 Southern	Gulf Atlantic	80.80%	86.35%
10/24/2020 Southern	Houston	88.58%	90.07%
10/24/2020 Southern	Louisiana	91.47%	81.29%
10/24/2020 Southern	Mississippi	80.13%	89.18%
10/24/2020 Southern	Oklahoma	93.13%	94.36%
10/24/2020 Southern	Rio Grande	92.42%	92.19%

10/24/2020 Southern	South Florida	84.31%	92.64%
10/24/2020 Southern	Suncoast	88.59%	80.12%
10/24/2020 Western	Alaska	84.43%	92.36%
10/24/2020 Western	Arizona	89.99%	88.10%
10/24/2020 Western	Central Plains	86.67%	96.03%
10/24/2020 Western	Colorado/Wyoming	74.69%	91.99%
10/24/2020 Western	Dakotas	90.04%	96.34%
10/24/2020 Western	Hawkeye	88.86%	93.42%
10/24/2020 Western	Mid-Americas	88.56%	89.78%
10/24/2020 Western	Nevada Sierra	91.51%	97.06%
10/24/2020 Western	Northland	81.59%	93.47%
10/24/2020 Western	Portland	88.24%	92.87%
10/24/2020 Western	Salt Lake City	92.85%	92.02%
10/24/2020 Western	Seattle	85.70%	91.45%
10/26/2020 Capital Metro	Atlanta	87.03%	61.48%
10/26/2020 Capital Metro	Baltimore	68.34%	66.64%
10/26/2020 Capital Metro	Capital	82.14%	95.62%
10/26/2020 Capital Metro	Greater S Carolina	72.57%	87.13%
10/26/2020 Capital Metro	Greensboro	79.41%	61.15%
10/26/2020 Capital Metro	Mid-Carolinas	88.17%	77.09%
10/26/2020 Capital Metro	Norther Virginia	86.86%	95.83%
10/26/2020 Capital Metro	Richmond	88.88%	90.39%
10/26/2020 Eastern	Appalachian	86.86%	88.50%
10/26/2020 Eastern	Central Pennsylvania	74.39%	66.39%
10/26/2020 Eastern	Kentuckiana	88.79%	95.61%
10/26/2020 Eastern	Norther Ohio	83.29%	74.23%
10/26/2020 Eastern	Ohio Valley	87.58%	81.47%
10/26/2020 Eastern	Philadelphia Metro	60.83%	56.21%
10/26/2020 Eastern	South Jersey	81.33%	86.97%
10/26/2020 Eastern	Tennessee	90.14%	89.18%
10/26/2020 Eastern	Western New York	89.02%	93.83%
10/26/2020 Eastern	Western Pennsylvania	91.50%	98.17%
10/26/2020 Great Lakes	Central Illinois	86.53%	84.16%
10/26/2020 Great Lakes	Chicago	92.32%	91.55%
10/26/2020 Great Lakes	Detroit	77.25%	82.02%
10/26/2020 Great Lakes	Gateway	88.53%	93.54%
10/26/2020 Great Lakes	Greater Indiana	94.46%	94.65%
10/26/2020 Great Lakes	Greater Michigan	88.66%	93.77%
10/26/2020 Great Lakes	Lakeland	90.39%	94.43%
10/26/2020 Northeast	Albany	92.25%	93.29%
10/26/2020 Northeast	Caribbean	95.16%	97.26%
10/26/2020 Northeast	Connecticut Valley	93.34%	95.90%
10/26/2020 Northeast	Greater Boston	93.15%	91.99%
10/26/2020 Northeast	Long Island	89.85%	93.55%
10/26/2020 Northeast	New York	91.65%	97.14%
10/26/2020 Northeast	Northern New England	92.03%	95.44%
10/26/2020 Northeast	Northern New Jersey	92.97%	89.92%



10/26/2020 Northeast	Triboro	93.99%	90.43%
10/26/2020 Northeast	Westchester	90.13%	85.90%
10/26/2020 Pacific	Bay-Valley	94.44%	97.61%
10/26/2020 Pacific	Honolulu	92.88%	46.13%
10/26/2020 Pacific	Los Angeles	93.56%	95.25%
10/26/2020 Pacific	Sacramento	94.59%	94.04%
10/26/2020 Pacific	San Diego	94.68%	96.78%
10/26/2020 Pacific	San Francisco	95.07%	97.58%
10/26/2020 Pacific	Santa Ana	95.29%	97.26%
10/26/2020 Pacific	Sierra Coastal	92.95%	97.46%
10/26/2020 Southern	Alabama	86.45%	81.44%
10/26/2020 Southern	Arkansas	94.40%	91.11%
10/26/2020 Southern	Dallas	92.11%	96.00%
10/26/2020 Southern	Ft. Worth	89.79%	88.36%
10/26/2020 Southern	Gulf Atlantic	83.78%	85.37%
10/26/2020 Southern	Houston	89.91%	95.90%
10/26/2020 Southern	Louisiana	92.38%	88.90%
10/26/2020 Southern	Mississippi	82.19%	85.57%
10/26/2020 Southern	Oklahoma	94.29%	96.17%
10/26/2020 Southern	Rio Grande	92.50%	90.76%
10/26/2020 Southern	South Florida	87.83%	92.35%
10/26/2020 Southern	Suncoast	91.46%	92.22%
10/26/2020 Western	Alaska	86.92%	87.03%
10/26/2020 Western	Arizona	91.93%	87.79%
10/26/2020 Western	Central Plains	92.99%	93.22%
10/26/2020 Western	Colorado/Wyoming	74.71%	90.73%
10/26/2020 Western	Dakotas	92.02%	95.45%
10/26/2020 Western	Hawkeye	92.25%	93.05%
10/26/2020 Western	Mid-Americas	90.53%	92.27%
10/26/2020 Western	Nevada Sierra	92.86%	93.96%
10/26/2020 Western	Northland	88.16%	92.32%
10/26/2020 Western	Portland	92.32%	93.92%
10/26/2020 Western	Salt Lake City	94.07%	93.00%
10/26/2020 Western	Seattle	91.61%	95.98%
10/27/2020 Capital Metro	Atlanta	56.91%	76.20%
10/27/2020 Capital Metro	Baltimore	34.37%	70.82%
10/27/2020 Capital Metro	Capital	64.03%	94.90%
10/27/2020 Capital Metro	Greater S Carolina	50.92%	90.54%
10/27/2020 Capital Metro	Greensboro	53.84%	59.39%
10/27/2020 Capital Metro	Mid-Carolinas	65.29%	73.34%
10/27/2020 Capital Metro	Norther Virginia	60.29%	95.97%
10/27/2020 Capital Metro	Richmond	65.68%	91.42%
10/27/2020 Eastern	Appalachian	64.47%	92.48%
10/27/2020 Eastern	Central Pennsylvania	61.08%	62.99%
10/27/2020 Eastern	Kentuckiana	74.54%	97.23%
10/27/2020 Eastern	Norther Ohio	50.42%	78.05%
10/27/2020 Eastern	Ohio Valley	55.51%	87.12%

10/27/2020 Eastern	Philadelphia Metro	36.65%	73.75%
10/27/2020 Eastern	South Jersey	45.47%	88.91%
10/27/2020 Eastern	Tennessee	67.02%	91.78%
10/27/2020 Eastern	Western New York	70.70%	96.77%
10/27/2020 Eastern	Western Pennsylvania	75.42%	96.89%
10/27/2020 Great Lakes	Central Illinois	67.31%	89.20%
10/27/2020 Great Lakes	Chicago	67.18%	94.28%
10/27/2020 Great Lakes	Detroit	47.81%	76.48%
10/27/2020 Great Lakes	Gateway	71.61%	91.94%
10/27/2020 Great Lakes	Greater Indiana	64.81%	95.30%
10/27/2020 Great Lakes	Greater Michigan	61.61%	86.34%
10/27/2020 Great Lakes	Lakeland	55.37%	93.78%
10/27/2020 Northeast	Albany	76.24%	93.14%
10/27/2020 Northeast	Caribbean	93.39%	81.59%
10/27/2020 Northeast	Connecticut Valley	74.03%	93.84%
10/27/2020 Northeast	Greater Boston	69.32%	93.13%
10/27/2020 Northeast	Long Island	74.60%	95.96%
10/27/2020 Northeast	New York	73.38%	97.13%
10/27/2020 Northeast	Northern New England	74.56%	86.62%
10/27/2020 Northeast	Northern New Jersey	68.01%	93.54%
10/27/2020 Northeast	Triboro	83.76%	92.62%
10/27/2020 Northeast	Westchester	71.43%	93.18%
10/27/2020 Pacific	Bay-Valley	76.24%	97.35%
10/27/2020 Pacific	Honolulu	83.54%	88.62%
10/27/2020 Pacific	Los Angeles	78.45%	96.51%
10/27/2020 Pacific	Sacramento	73.64%	92.70%
10/27/2020 Pacific	San Diego	76.71%	96.14%
10/27/2020 Pacific	San Francisco	75.89%	98.11%
10/27/2020 Pacific	Santa Ana	62.44%	97.46%
10/27/2020 Pacific	Sierra Coastal	75.29%	97.61%
10/27/2020 Southern	Alabama	61.20%	89.10%
10/27/2020 Southern	Arkansas	76.28%	92.26%
10/27/2020 Southern	Dallas	74.45%	93.38%
10/27/2020 Southern	Ft. Worth	72.69%	92.66%
10/27/2020 Southern	Gulf Atlantic	57.88%	85.88%
10/27/2020 Southern	Houston	79.10%	95.43%
10/27/2020 Southern	Louisiana	68.90%	89.17%
10/27/2020 Southern	Mississippi	54.87%	86.72%
10/27/2020 Southern	Oklahoma	80.06%	96.27%
10/27/2020 Southern	Rio Grande	77.85%	94.92%
10/27/2020 Southern	South Florida	56.60%	89.59%
10/27/2020 Southern	Suncoast	63.59%	95.24%
10/27/2020 Western	Alaska	70.74%	90.91%
10/27/2020 Western	Arizona	70.47%	89.90%
10/27/2020 Western	Central Plains	81.15%	95.81%
10/27/2020 Western	Colorado/Wyoming	43.85%	86.49%
10/27/2020 Western	Dakotas	70.78%	93.98%

10/27/2020 Western	Hawkeye	70.73%	93.52%
10/27/2020 Western	Mid-Americas	59.79%	85.72%
10/27/2020 Western	Nevada Sierra	78.06%	96.26%
10/27/2020 Western	Northland	58.44%	90.38%
10/27/2020 Western	Portland	75.90%	87.49%
10/27/2020 Western	Salt Lake City	70.02%	96.26%
10/27/2020 Western	Seattle	64.00%	97.09%
10/28/2020 Capital Metro	Atlanta	81.30%	61.92%
10/28/2020 Capital Metro	Baltimore	62.45%	84.80%
10/28/2020 Capital Metro	Capital	83.61%	94.79%
10/28/2020 Capital Metro	Greater S Carolina	79.15%	78.86%
10/28/2020 Capital Metro	Greensboro	74.87%	47.75%
10/28/2020 Capital Metro	Mid-Carolinas	63.36%	64.12%
10/28/2020 Capital Metro	Norther Virginia	83.79%	95.09%
10/28/2020 Capital Metro	Richmond	88.92%	88.92%
10/28/2020 Eastern	Appalachian	83.64%	89.02%
10/28/2020 Eastern	Central Pennsylvania	65.58%	52.56%
10/28/2020 Eastern	Kentuckiana	89.84%	94.35%
10/28/2020 Eastern	Norther Ohio	80.06%	66.02%
10/28/2020 Eastern	Ohio Valley	82.50%	87.70%
10/28/2020 Eastern	Philadelphia Metro	61.57%	63.18%
10/28/2020 Eastern	South Jersey	81.86%	92.53%
10/28/2020 Eastern	Tennessee	90.04%	85.43%
10/28/2020 Eastern	Western New York	92.90%	93.52%
10/28/2020 Eastern	Western Pennsylvania	88.78%	93.70%
10/28/2020 Great Lakes	Central Illinois	79.68%	89.33%
10/28/2020 Great Lakes	Chicago	86.87%	86.88%
10/28/2020 Great Lakes	Detroit	67.60%	77.00%
10/28/2020 Great Lakes	Gateway	83.99%	88.47%
10/28/2020 Great Lakes	Greater Indiana	86.79%	89.52%
10/28/2020 Great Lakes	Greater Michigan	80.39%	85.30%
10/28/2020 Great Lakes	Lakeland	82.37%	90.70%
10/28/2020 Northeast	Albany	92.07%	94.25%
10/28/2020 Northeast	Caribbean	96.47%	92.17%
10/28/2020 Northeast	Connecticut Valley	89.35%	94.23%
10/28/2020 Northeast	Greater Boston	90.73%	87.61%
10/28/2020 Northeast	Long Island	86.64%	92.42%
10/28/2020 Northeast	New York	89.08%	95.14%
10/28/2020 Northeast	Northern New England	86.50%	91.36%
10/28/2020 Northeast	Northern New Jersey	86.03%	93.50%
10/28/2020 Northeast	Triboro	84.43%	94.75%
10/28/2020 Northeast	Westchester	89.45%	93.56%
10/28/2020 Pacific	Bay-Valley	93.05%	95.73%
10/28/2020 Pacific	Honolulu	93.17%	92.75%
10/28/2020 Pacific	Los Angeles	88.78%	95.61%
10/28/2020 Pacific	Sacramento	88.87%	90.53%
10/28/2020 Pacific	San Diego	91.64%	97.55%

10/28/2020 Pacific	San Francisco	89.31%	96.91%
10/28/2020 Pacific	Santa Ana	88.94%	95.88%
10/28/2020 Pacific	Sierra Coastal	91.24%	96.70%
10/28/2020 Southern	Alabama	91.10%	87.01%
10/28/2020 Southern	Arkansas	89.69%	93.66%
10/28/2020 Southern	Dallas	84.06%	92.17%
10/28/2020 Southern	Ft. Worth	89.38%	94.71%
10/28/2020 Southern	Gulf Atlantic	81.52%	83.08%
10/28/2020 Southern	Houston	81.06%	93.56%
10/28/2020 Southern	Louisiana	92.33%	88.66%
10/28/2020 Southern	Mississippi	88.01%	76.26%
10/28/2020 Southern	Oklahoma	92.77%	96.72%
10/28/2020 Southern	Rio Grande	89.89%	93.88%
10/28/2020 Southern	South Florida	74.59%	92.76%
10/28/2020 Southern	Suncoast	87.76%	89.16%
10/28/2020 Western	Alaska	88.00%	77.49%
10/28/2020 Western	Arizona	87.79%	92.80%
10/28/2020 Western	Central Plains	88.45%	90.22%
10/28/2020 Western	Colorado/Wyoming	65.96%	67.61%
10/28/2020 Western	Dakotas	89.86%	90.62%
10/28/2020 Western	Hawkeye	89.49%	89.61%
10/28/2020 Western	Mid-Americas	86.65%	75.16%
10/28/2020 Western	Nevada Sierra	90.13%	94.65%
10/28/2020 Western	Northland	86.43%	86.55%
10/28/2020 Western	Portland	89.83%	86.40%
10/28/2020 Western	Salt Lake City	85.34%	95.05%
10/28/2020 Western	Seattle	88.39%	96.70%

# Exhibit 67

Date	Area	District	Processing Score: Outbound		
			Processing Score: Inbound Ballot	Processing Score: Outbound Ballot	Non-Ballot Election Mail
10/24/2020	Nation		94.73%	94.09%	95.93%
10/26/2020	Nation		93.39%	95.27%	57.40%
10/27/2020	Nation		94.87%	91.30%	29.88%
10/28/2020	Nation		97.13%	97.60%	63.58%
10/24/2020	Capital Metro		88.74%	51.90%	75.43%
10/24/2020	Eastern		91.41%	98.33%	75.26%
10/24/2020	Great Lakes		88.53%	71.33%	94.34%
10/24/2020	Northeast		95.16%	99.10%	95.87%
10/24/2020	Pacific		98.28%	96.07%	99.87%
10/24/2020	Southern		93.73%	57.74%	95.50%
10/24/2020	Western		95.02%	77.88%	98.85%
10/26/2020	Capital Metro		89.53%	85.08%	54.78%
10/26/2020	Eastern		90.73%	98.45%	12.40%
10/26/2020	Great Lakes		88.42%	77.59%	97.71%
10/26/2020	Northeast		95.82%	97.45%	51.84%
10/26/2020	Pacific		97.23%	93.95%	95.90%
10/26/2020	Southern		90.70%	68.18%	84.80%
10/26/2020	Western		93.37%	79.96%	97.65%
10/27/2020	Capital Metro		75.94%	66.41%	47.67%
10/27/2020	Eastern		92.41%	91.43%	2.64%
10/27/2020	Great Lakes		80.06%	37.12%	31.74%
10/27/2020	Northeast		95.14%	99.90%	60.58%
10/27/2020	Pacific		98.83%	82.31%	85.82%
10/27/2020	Southern		93.23%	86.38%	18.44%
10/27/2020	Western		95.84%	38.58%	52.58%
10/28/2020	Capital Metro		94.91%	16.05%	71.85%
10/28/2020	Eastern		95.62%	97.53%	3.27%
10/28/2020	Great Lakes		94.52%	26.15%	95.79%
10/28/2020	Northeast		97.37%	99.26%	17.76%
10/28/2020	Pacific		99.08%	94.36%	32.58%
10/28/2020	Southern		95.57%	87.71%	85.87%
10/28/2020	Western		97.20%	85.11%	26.90%
10/24/2020	Capital Metro	Atlanta	84.88%	1.78%	25.59%
10/24/2020	Capital Metro	Baltimore	84.22%	96.87%	71.03%
10/24/2020	Capital Metro	Capital	92.97%	49.43%	90.95%
10/24/2020	Capital Metro	Greater S Carolina	92.20%	36.84%	13.17%
10/24/2020	Capital Metro	Greensboro	83.62%	97.15%	89.59%
10/24/2020	Capital Metro	Mid-Carolinas	90.57%	91.19%	62.34%
10/24/2020	Capital Metro	Norther Virginia	91.57%	44.44%	95.05%
10/24/2020	Capital Metro	Richmond	92.45%	84.75%	92.36%

10/24/2020	Eastern	Appalachian	59.15%	68.57%	68.22%
10/24/2020	Eastern	Central Pennsylvania	78.59%	1.35%	0.78%
10/24/2020	Eastern	Kentuckiana	38.20%	61.11%	99.89%
10/24/2020	Eastern	Norther Ohio	91.85%	4.88%	71.21%
10/24/2020	Eastern	Ohio Valley	95.08%	95.02%	89.47%
10/24/2020	Eastern	Philadelphia	91.57%	40.30%	4.75%
10/24/2020	Eastern	South Jersey	95.55%	99.97%	47.00%
10/24/2020	Eastern	Tennessee	88.85%	39.37%	12.64%
10/24/2020	Eastern	Western New York	96.20%	57.14%	23.81%
10/24/2020	Eastern	Western	98.08%	98.08%	36.03%
10/24/2020	Great Lakes	Central Illinois	89.84%	2.75%	99.08%
10/24/2020	Great Lakes	Chicago	90.70%	81.36%	10.16%
10/24/2020	Great Lakes	Detroit	73.96%	80.20%	0.11%
10/24/2020	Great Lakes	Gateway	93.46%	83.84%	99.99%
10/24/2020	Great Lakes	Greater Indiana	72.98%	78.40%	96.35%
10/24/2020	Great Lakes	Greater Michigan	91.67%	83.56%	97.32%
10/24/2020	Great Lakes	Lakeland	81.91%	26.85%	98.61%
10/24/2020	Northeast	Albany	95.20%	66.67%	78.85%
10/24/2020	Northeast	Caribbean	99.62%	100.00%	80.00%
10/24/2020	Northeast	Connecticut Valley	95.56%	98.86%	78.90%
10/24/2020	Northeast	Greater Boston	96.03%	87.07%	99.45%
10/24/2020	Northeast	Long Island	96.62%	83.33%	92.47%
10/24/2020	Northeast	New York	91.19%	90.91%	37.78%
10/24/2020	Northeast	Northern New	76.86%	81.82%	98.93%
10/24/2020	Northeast	Northern New Jersey	96.50%	99.59%	99.84%
10/24/2020	Northeast	Triboro	83.10%	72.60%	11.38%
10/24/2020	Northeast	Westchester	92.77%	81.25%	94.03%
10/24/2020	Pacific	Bay-Valley	98.43%	21.43%	90.67%
10/24/2020	Pacific	Honolulu	97.19%	32.31%	62.24%
10/24/2020	Pacific	Los Angeles	98.59%	80.00%	99.89%
10/24/2020	Pacific	Sacramento	96.75%	81.36%	97.46%
10/24/2020	Pacific	San Diego	98.84%	99.70%	98.32%
10/24/2020	Pacific	San Francisco	98.32%	45.65%	98.14%
10/24/2020	Pacific	Santa Ana	99.02%	96.61%	99.97%
10/24/2020	Pacific	Sierra Coastal	98.49%	99.30%	99.99%
10/24/2020	Southern	Alabama	66.61%	33.93%	53.33%
10/24/2020	Southern	Arkansas	91.54%	45.16%	69.23%
10/24/2020	Southern	Dallas	94.63%	69.57%	35.96%
10/24/2020	Southern	Ft. Worth	90.06%	97.39%	30.89%
10/24/2020	Southern	Gulf Atlantic	90.83%	3.62%	99.10%
10/24/2020	Southern	Houston	84.68%	19.05%	5.59%
10/24/2020	Southern	Louisiana	78.08%	34.62%	7.99%
10/24/2020	Southern	Mississippi	85.53%	36.84%	9.81%
10/24/2020	Southern	Oklahoma	76.13%	70.00%	99.94%
10/24/2020	Southern	Rio Grande	91.21%	55.56%	99.56%
10/24/2020	Southern	South Florida	92.92%	23.19%	52.08%
10/24/2020	Southern	Suncoast	96.62%	60.76%	85.80%

10/24/2020	Western	Alaska	79.64%	36.00%	65.00%
10/24/2020	Western	Arizona	97.56%	78.84%	99.86%
10/24/2020	Western	Central Plains	96.73%	68.57%	99.99%
10/24/2020	Western	Colorado/Wyoming	71.35%	63.47%	91.95%
10/24/2020	Western	Dakotas	96.24%	29.63%	99.74%
10/24/2020	Western	Hawkeye	95.23%	47.73%	99.46%
10/24/2020	Western	Mid-Americas	93.77%	69.09%	99.99%
10/24/2020	Western	Nevada Sierra	97.85%	67.65%	99.79%
10/24/2020	Western	Northland	97.31%	16.55%	96.62%
10/24/2020	Western	Portland	92.49%	12.70%	61.36%
10/24/2020	Western	Salt Lake City	98.78%	96.24%	94.84%
10/24/2020	Western	Seattle	97.75%	6.17%	33.07%
10/26/2020	Capital Metro	Atlanta	89.48%	1.77%	42.49%
10/26/2020	Capital Metro	Baltimore	91.26%	90.68%	36.52%
10/26/2020	Capital Metro	Capital	93.16%	99.72%	91.44%
10/26/2020	Capital Metro	Greater S Carolina	87.30%	58.96%	84.44%
10/26/2020	Capital Metro	Greensboro	82.79%	97.39%	75.82%
10/26/2020	Capital Metro	Mid-Carolinas	86.19%	97.35%	35.07%
10/26/2020	Capital Metro	Norther Virginia	93.47%	86.58%	78.40%
10/26/2020	Capital Metro	Richmond	91.16%	35.25%	96.86%
10/26/2020	Eastern	Appalachian	74.96%	67.24%	96.74%
10/26/2020	Eastern	Central Pennsylvania	78.81%	8.02%	1.70%
10/26/2020	Eastern	Kentuckiana	65.38%	78.67%	99.76%
10/26/2020	Eastern	Norther Ohio	92.64%	35.93%	40.36%
10/26/2020	Eastern	Ohio Valley	94.80%	22.40%	52.94%
10/26/2020	Eastern	Philadelphia	93.03%	95.06%	0.08%
10/26/2020	Eastern	South Jersey	90.91%	99.96%	3.30%
10/26/2020	Eastern	Tennessee	92.82%	79.59%	96.88%
10/26/2020	Eastern	Western New York	96.60%	100.00%	84.91%
10/26/2020	Eastern	Western	97.26%	25.38%	83.74%
10/26/2020	Great Lakes	Central Illinois	94.35%	78.03%	99.79%
10/26/2020	Great Lakes	Chicago	87.65%	77.86%	78.86%
10/26/2020	Great Lakes	Detroit	73.94%	57.14%	26.00%
10/26/2020	Great Lakes	Gateway	93.16%	98.77%	99.90%
10/26/2020	Great Lakes	Greater Indiana	79.93%	92.45%	94.76%
10/26/2020	Great Lakes	Greater Michigan	87.32%	7.43%	99.88%
10/26/2020	Great Lakes	Lakeland	87.48%	13.23%	90.78%
10/26/2020	Northeast	Albany	96.31%	93.66%	68.56%
10/26/2020	Northeast	Caribbean	98.59%	32.26%	98.05%
10/26/2020	Northeast	Connecticut Valley	94.79%	98.10%	76.35%
10/26/2020	Northeast	Greater Boston	96.96%	88.15%	80.42%
10/26/2020	Northeast	Long Island	96.02%	90.70%	78.47%
10/26/2020	Northeast	New York	96.48%	94.10%	34.43%
10/26/2020	Northeast	Northern New	84.46%	91.49%	94.37%
10/26/2020	Northeast	Northern New Jersey	96.75%	97.47%	12.32%
10/26/2020	Northeast	Triboro	89.11%	93.67%	16.72%
10/26/2020	Northeast	Westchester	94.52%	97.14%	81.48%



10/26/2020	Pacific	Bay-Valley	96.84%	44.59%	98.00%
10/26/2020	Pacific	Honolulu	94.73%	63.16%	99.49%
10/26/2020	Pacific	Los Angeles	96.37%	73.94%	92.18%
10/26/2020	Pacific	Sacramento	97.06%	95.41%	82.25%
10/26/2020	Pacific	San Diego	98.07%	84.86%	99.35%
10/26/2020	Pacific	San Francisco	97.76%	80.00%	99.55%
10/26/2020	Pacific	Santa Ana	97.65%	98.80%	99.34%
10/26/2020	Pacific	Sierra Coastal	97.96%	86.90%	94.84%
10/26/2020	Southern	Alabama	74.30%	60.90%	85.50%
10/26/2020	Southern	Arkansas	91.98%	87.50%	98.30%
10/26/2020	Southern	Dallas	91.98%	84.76%	86.10%
10/26/2020	Southern	Ft. Worth	88.60%	14.71%	47.88%
10/26/2020	Southern	Gulf Atlantic	85.89%	10.52%	28.04%
10/26/2020	Southern	Houston	90.25%	84.62%	97.38%
10/26/2020	Southern	Louisiana	74.23%	55.77%	98.37%
10/26/2020	Southern	Mississippi	74.09%	65.91%	82.08%
10/26/2020	Southern	Oklahoma	78.92%	90.00%	99.73%
10/26/2020	Southern	Rio Grande	87.62%	85.47%	93.09%
10/26/2020	Southern	South Florida	90.40%	81.01%	87.16%
10/26/2020	Southern	Suncoast	94.38%	72.20%	92.83%
10/26/2020	Western	Alaska	82.86%	68.42%	94.53%
10/26/2020	Western	Arizona	97.90%	83.30%	92.30%
10/26/2020	Western	Central Plains	90.85%	28.80%	99.70%
10/26/2020	Western	Colorado/Wyoming	62.58%	47.11%	69.14%
10/26/2020	Western	Dakotas	94.99%	58.46%	93.60%
10/26/2020	Western	Hawkeye	97.56%	81.97%	99.84%
10/26/2020	Western	Mid-Americas	86.70%	83.19%	99.88%
10/26/2020	Western	Nevada Sierra	87.17%	64.12%	98.69%
10/26/2020	Western	Northland	92.28%	85.71%	97.59%
10/26/2020	Western	Portland	97.24%	59.02%	62.43%
10/26/2020	Western	Salt Lake City	97.83%	88.35%	94.66%
10/26/2020	Western	Seattle	96.25%	12.39%	97.22%
10/27/2020	Capital Metro	Atlanta	44.25%	0.87%	27.67%
10/27/2020	Capital Metro	Baltimore	85.55%	67.95%	4.01%
10/27/2020	Capital Metro	Capital	89.27%	99.93%	22.52%
10/27/2020	Capital Metro	Greater S Carolina	80.71%	69.51%	26.20%
10/27/2020	Capital Metro	Greensboro	77.20%	98.27%	48.38%
10/27/2020	Capital Metro	Mid-Carolinas	72.16%	89.73%	75.32%
10/27/2020	Capital Metro	Norther Virginia	66.01%	75.47%	83.28%
10/27/2020	Capital Metro	Richmond	84.37%	86.39%	89.73%
10/27/2020	Eastern	Appalachian	51.84%	48.86%	31.08%
10/27/2020	Eastern	Central Pennsylvania	60.72%	27.41%	3.03%
10/27/2020	Eastern	Kentuckiana	62.72%	26.98%	86.38%
10/27/2020	Eastern	Norther Ohio	91.37%	63.31%	0.38%
10/27/2020	Eastern	Ohio Valley	94.94%	51.92%	25.82%
10/27/2020	Eastern	Philadelphia	96.21%	87.07%	0.03%
10/27/2020	Eastern	South Jersey	96.70%	99.72%	0.14%

10/27/2020	Eastern	Tennessee	92.33%	84.27%	72.07%
10/27/2020	Eastern	Western New York	98.22%	95.65%	68.75%
10/27/2020	Eastern	Western	97.27%	96.42%	95.29%
10/27/2020	Great Lakes	Central Illinois	85.65%	14.41%	97.94%
10/27/2020	Great Lakes	Chicago	90.22%	83.33%	55.46%
10/27/2020	Great Lakes	Detroit	56.92%	57.89%	4.62%
10/27/2020	Great Lakes	Gateway	82.25%	85.64%	24.45%
10/27/2020	Great Lakes	Greater Indiana	52.36%	72.03%	7.91%
10/27/2020	Great Lakes	Greater Michigan	58.79%	3.41%	0.14%
10/27/2020	Great Lakes	Lakeland	60.52%	88.51%	6.57%
10/27/2020	Northeast	Albany	83.68%	80.95%	14.20%
10/27/2020	Northeast	Caribbean	99.57%	31.43%	75.00%
10/27/2020	Northeast	Connecticut Valley	77.94%	69.39%	47.94%
10/27/2020	Northeast	Greater Boston	93.96%	90.99%	91.96%
10/27/2020	Northeast	Long Island	97.17%	87.50%	10.36%
10/27/2020	Northeast	New York	95.12%	72.16%	97.98%
10/27/2020	Northeast	Northern New	67.12%	87.50%	4.12%
10/27/2020	Northeast	Northern New Jersey	97.51%	99.94%	3.41%
10/27/2020	Northeast	Triboro	95.54%	51.39%	86.88%
10/27/2020	Northeast	Westchester	73.20%	72.22%	84.30%
10/27/2020	Pacific	Bay-Valley	99.09%	61.43%	94.23%
10/27/2020	Pacific	Honolulu	96.44%	93.94%	94.34%
10/27/2020	Pacific	Los Angeles	99.22%	20.13%	66.95%
10/27/2020	Pacific	Sacramento	97.93%	47.62%	35.31%
10/27/2020	Pacific	San Diego	99.12%	18.79%	98.16%
10/27/2020	Pacific	San Francisco	99.27%	81.36%	90.75%
10/27/2020	Pacific	Santa Ana	99.14%	85.04%	74.68%
10/27/2020	Pacific	Sierra Coastal	98.73%	97.43%	92.85%
10/27/2020	Southern	Alabama	62.64%	65.96%	6.58%
10/27/2020	Southern	Arkansas	72.59%	90.48%	8.39%
10/27/2020	Southern	Dallas	87.58%	88.00%	7.72%
10/27/2020	Southern	Ft. Worth	78.10%	53.93%	5.44%
10/27/2020	Southern	Gulf Atlantic	85.64%	24.46%	8.23%
10/27/2020	Southern	Houston	79.28%	84.62%	28.04%
10/27/2020	Southern	Louisiana	72.29%	90.74%	19.12%
10/27/2020	Southern	Mississippi	85.79%	100.00%	6.57%
10/27/2020	Southern	Oklahoma	77.86%	59.76%	70.05%
10/27/2020	Southern	Rio Grande	86.49%	70.80%	6.96%
10/27/2020	Southern	South Florida	94.71%	68.00%	53.69%
10/27/2020	Southern	Suncoast	97.18%	91.04%	11.36%
10/27/2020	Western	Alaska	83.23%	64.29%	49.45%
10/27/2020	Western	Arizona	98.36%	38.15%	36.05%
10/27/2020	Western	Central Plains	95.70%	75.56%	89.16%
10/27/2020	Western	Colorado/Wyoming	79.47%	3.97%	4.21%
10/27/2020	Western	Dakotas	92.80%	39.74%	5.61%
10/27/2020	Western	Hawkeye	97.69%	90.32%	0.02%
10/27/2020	Western	Mid-Americas	95.16%	80.28%	0.10%

10/27/2020	Western	Nevada Sierra	97.71%	28.31%	52.63%
10/27/2020	Western	Northland	95.60%	87.66%	82.28%
10/27/2020	Western	Portland	97.79%	13.17%	43.29%
10/27/2020	Western	Salt Lake City	89.14%	43.82%	49.11%
10/27/2020	Western	Seattle	98.09%	12.45%	28.33%
10/28/2020	Capital Metro	Atlanta	95.92%	4.30%	16.60%
10/28/2020	Capital Metro	Baltimore	95.44%	0.60%	2.39%
10/28/2020	Capital Metro	Capital	96.75%	14.97%	60.14%
10/28/2020	Capital Metro	Greater S Carolina	93.82%	23.13%	9.24%
10/28/2020	Capital Metro	Greensboro	91.87%	71.88%	96.55%
10/28/2020	Capital Metro	Mid-Carolinas	90.95%	60.28%	13.28%
10/28/2020	Capital Metro	Norther Virginia	97.50%	57.14%	26.98%
10/28/2020	Capital Metro	Richmond	97.28%	23.53%	6.35%
10/28/2020	Eastern	Appalachian	90.24%	36.11%	18.64%
10/28/2020	Eastern	Central Pennsylvania	87.08%	35.54%	75.56%
10/28/2020	Eastern	Kentuckiana	75.14%	81.48%	9.79%
10/28/2020	Eastern	Norther Ohio	97.55%	58.40%	2.29%
10/28/2020	Eastern	Ohio Valley	97.95%	42.95%	62.59%
10/28/2020	Eastern	Philadelphia	96.77%	66.47%	0.02%
10/28/2020	Eastern	South Jersey	97.50%	98.47%	0.03%
10/28/2020	Eastern	Tennessee	95.52%	79.59%	0.56%
10/28/2020	Eastern	Western New York	98.60%	39.29%	0.74%
10/28/2020	Eastern	Western	98.45%	97.79%	12.50%
10/28/2020	Great Lakes	Central Illinois	96.08%	15.84%	51.00%
10/28/2020	Great Lakes	Chicago	96.04%	88.89%	17.88%
10/28/2020	Great Lakes	Detroit	84.24%	58.33%	99.92%
10/28/2020	Great Lakes	Gateway	95.89%	74.22%	20.15%
10/28/2020	Great Lakes	Greater Indiana	90.64%	81.32%	77.96%
10/28/2020	Great Lakes	Greater Michigan	95.87%	2.14%	10.58%
10/28/2020	Great Lakes	Lakeland	94.03%	45.33%	40.01%
10/28/2020	Northeast	Albany	98.34%	71.43%	9.47%
10/28/2020	Northeast	Caribbean	99.51%		0.00%
10/28/2020	Northeast	Connecticut Valley	98.23%	61.11%	64.14%
10/28/2020	Northeast	Greater Boston	97.79%	36.23%	41.86%
10/28/2020	Northeast	Long Island	99.02%	100.00%	50.00%
10/28/2020	Northeast	New York	97.55%	98.04%	41.79%
10/28/2020	Northeast	Northern New	87.46%	12.28%	5.70%
10/28/2020	Northeast	Northern New Jersey	97.33%	99.29%	1.01%
10/28/2020	Northeast	Triboro	88.84%	92.73%	9.52%
10/28/2020	Northeast	Westchester	98.02%	36.67%	9.83%
10/28/2020	Pacific	Bay-Valley	99.10%	83.33%	96.21%
10/28/2020	Pacific	Honolulu	98.57%	89.47%	81.48%
10/28/2020	Pacific	Los Angeles	98.76%	21.79%	14.98%
10/28/2020	Pacific	Sacramento	99.32%	82.35%	19.63%
10/28/2020	Pacific	San Diego	99.25%	99.67%	66.07%
10/28/2020	Pacific	San Francisco	98.85%	86.67%	94.00%
10/28/2020	Pacific	Santa Ana	99.53%	97.47%	69.60%

10/28/2020 Pacific	Sierra Coastal	98.73%	84.93%	56.39%
10/28/2020 Southern	Alabama	86.97%	31.43%	7.56%
10/28/2020 Southern	Arkansas	95.94%	50.00%	50.00%
10/28/2020 Southern	Dallas	95.50%	17.81%	37.18%
10/28/2020 Southern	Ft. Worth	94.24%	22.86%	15.38%
10/28/2020 Southern	Gulf Atlantic	94.97%	18.98%	88.19%
10/28/2020 Southern	Houston	95.44%	50.00%	26.32%
10/28/2020 Southern	Louisiana	88.11%	100.00%	23.68%
10/28/2020 Southern	Mississippi	94.27%	66.67%	6.35%
10/28/2020 Southern	Oklahoma	87.16%	81.82%	37.50%
10/28/2020 Southern	Rio Grande	93.46%	13.84%	19.48%
10/28/2020 Southern	South Florida	95.47%	35.71%	95.64%
10/28/2020 Southern	Suncoast	96.62%	92.42%	78.26%
10/28/2020 Western	Alaska	94.81%	87.50%	98.86%
10/28/2020 Western	Arizona	98.04%	90.27%	3.64%
10/28/2020 Western	Central Plains	96.66%	60.61%	56.95%
10/28/2020 Western	Colorado/Wyoming	81.66%	3.30%	8.16%
10/28/2020 Western	Dakotas	96.71%	26.92%	50.00%
10/28/2020 Western	Hawkeye	98.41%	80.95%	0.18%
10/28/2020 Western	Mid-Americas	95.67%	76.60%	14.31%
10/28/2020 Western	Nevada Sierra	98.04%	33.62%	38.46%
10/28/2020 Western	Northland	97.07%	5.49%	36.77%
10/28/2020 Western	Portland	98.16%	72.46%	64.30%
10/28/2020 Western	Salt Lake City	98.10%	97.08%	70.37%
10/28/2020 Western	Seattle	98.16%	7.69%	47.73%