June 2008

Dear Mayor or Chief Administrative Officer:

**Re: Urgent request for submissions to save universal, public postal service**

I am writing to let you know that the federal government is conducting a very quick and potentially damaging review of our public post office called the Canada Post Corporation Strategic Review.

The review is looking at fundamental questions such as should our public post office continue to have an exclusive privilege to handle letters so that it has the money to provide universal service, or should the letter market be open to competition. That is, it is looking at deregulation.

CUPW is very concerned that the government’s review includes an examination of deregulation. You may be interested to know that postal deregulation in other countries has led to post office closures, less service, fewer jobs and higher postal rates for the public and small businesses.

The union is also concerned that the government is not holding public hearings as part of its review. It is simply asking individuals and groups to make submissions by September 2, 2008.

The fact that the government is not holding public hearings and is proceeding at a breakneck pace with its review suggests that it is not really interested in hearing from the real owners of the post office – the public. We want to make sure that the views of the public and public interest groups are considered. Therefore, we would like municipalities to consider passing the enclosed resolution and writing a letter or submission to the Canada Post Corporation Strategic Review. You can get basic information about making a submission from the enclosed fact sheet called *Submissions to save universal, public postal service* and additional information from the other enclosures.

If you decide to write a letter or submission, please do not forget to tell the Canada Post Corporation Strategic Review how you use our public post office. If private sector mail providers do not service your community, make sure you tell the review this as well. You may also wish to point out that it will be difficult for Canada Post to improve public postal service if the government erodes or eliminates the mechanism that funds this service (i.e. the exclusive privilege). Please don’t forget to send us a copy of any letter or submission you write.
CANADA POST CORPORATION STRATEGIC REVIEW

WHEREAS the Canada Post Corporation Strategic Review, which was launched by the federal government on April 21, 2008, is looking at deregulating our public post office (i.e. reducing or removing Canada Post’s exclusive privilege on letters)

WHEREAS it will become increasingly difficult for our public post office to provide affordable service to everyone, no matter where they live, if the government erodes or eliminates the very mechanism that funds universal postal service - the exclusive privilege.

WHEREAS postal deregulation in other countries has led to post office closures, less service, fewer jobs and higher postal rates for the public and small businesses.

WHEREAS the government is not holding public hearings as part of its strategic review or adequately consulting with the real owners of the post office – the public.

BE IT RESOLVED THAT _________________ send a letter or submission to the Canada Post Corporation Strategic Review opposing deregulation of Canada Post and insisting that the government hold public hearings and properly consult with the true owners of Canada Post – the public.

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Submissions to save universal public postal service

The federal government is reviewing our post office for the first time in 12 years. It has asked an advisory panel to conduct this inquiry, which it is calling the Canada Post Corporation Strategic Review (CPCSR). The panel has a very broad and scary mandate. The Canadian Union of Postal Workers (CUPW) is asking the public, community groups, small businesses and others to consider making submissions to the CPCSR in support of universal pubic postal service. A submission can be short or long. It can be a letter. This fact sheet provides suggestions for making submissions and highlights a few areas of concern.

Some points you may wish to cover:

1. Deregulation

The government’s strategic review will look at a very basic and important issue: Should Canada Post continue to have an exclusive privilege to handle addressed letters or should the letter market be open to competition?

Providing Canada Post with an exclusive privilege to handle addressed letters is a form of regulation. Reducing or eliminating this privilege is deregulation.

Regulations exist for reasons. Canada Post has an exclusive privilege to handle letters so that it is able to generate enough money to provide affordable postal service to everyone, no matter where they live in our huge country, be it a large urban centre or a rural or isolated community. It will become increasingly difficult for our public post office to provide universal postal service if the government erodes or eliminates the very mechanism that funds universal postal service – the exclusive privilege.

For more information, see Fact Sheet #4: Five reasons to oppose deregulation of our public post office.
Suggestions for making submissions:

- Postal deregulation in other countries has largely led to fewer jobs, less service and higher postal rates for the public and small businesses.

- Recently, an independent review of the United Kingdom’s deregulated postal sector found that “there have been no significant benefits from liberalisation for smaller businesses and domestic consumers.” For the report go to: http://www.berr.gov.uk/publications/index.html

- Only a few countries have had any long-term experience with postal deregulation. It would make sense to wait and see what happens in other countries before making irrevocable changes to our universal, public post office.

- Hands off our post office. There is no good reason to change the mechanism that funds universal postal service – the exclusive privilege. We currently have one of the lowest standard postage rates in the industrial world. Our postal services are universal and affordable, no small feat in the second largest country in the world.

- Deregulation elsewhere has not proven to be a good thing for the public. People who use deregulated post offices tend to pay a higher postage rate than we do. The standard postage rate in Sweden has increased by 90% since its post office was deregulated in 1993 while the Canadian rate has increased by only 21% during the same period.

- The United Kingdom’s Royal Mail has faced intense pressure from competitors since it deregulated in 2006, resulting in falling mail volumes and revenues. Royal Mail says higher prices for stamped letters are inevitable and universal service is at risk.

- Our post office is not broken. It does not need to be fixed, only improved.
2. Public service or business goals

The strategic review will also consider what financial targets are appropriate for our public post office. Currently, the government asks Canada Post to generate business-like profits and dividends. As a result, the corporation tends to focus on major customers and profit-making rather than on the public and providing a public service. Canada Post needs to shift its focus to public interest objectives.

For more information, see Fact Sheet #3: Our universal public postal service - Our vision.

Suggestions for making submissions:

- When our post office became a Crown corporation in 1981, business groups and others insisted that the Canada Post Corporation Act include a provision ensuring that “postage rates shall be fair, reasonable and sufficient to defray the costs incurred by the Corporation in the conduct of its operations under this Act.” They didn’t want the post office to become a cash cow for the government. They wanted all money from postage ploughed back into service.

- The government should stop taking millions in dividends from Canada Post and start investing this money in public postal services like post offices, rural delivery and door-to-door delivery.

3. Public hearings

The federal government has decided not to hold public hearings in connection with its review. It has asked the review’s advisory panel to accept submissions from the public and groups over a four-month period which includes the summer. The decision to forgo hearings and adhere to a tight time frame appears to be designed to limit input from the real owners of our post office – the public.

You can get additional information about the government’s review from Fact #2: The Canada Post Corporation Strategic Review.

Suggestions for making submissions:

- Any review of our public post office should include public hearings. The government should not make any decisions about our public post office until it has properly consulted with the public. The government should also extend the deadline for submissions.
Making a Submission

Submissions are due by September 2, 2008

The Canada Post Strategic Review says a “submission may consist of brief statements, comments or more elaborate analyses and reports”. Submissions must be in French or English. Organizations must use official letterhead.

Send your submissions

By Mail:

Canada Post Corporation Strategic Review
330 Sparks Street (HCCR)
Ottawa, Ontario
K1A 0N5

By Fax:

613-990-9033

By E-mail:

Send a PDF or MS Word document attachment to:
info@cpcsrg-esscp.gc.ca

Through the CPCSR website:

Make your views known by going to:
http://www.cpcstrategicreview-examenstrategiquescpc.gc.ca/hw-eng.html
The Canada Post Corporation Strategic Review

The federal government is conducting an inquiry called the Canada Post Corporation Strategic Review. It says it is conducting this review to make sure our public post office “has the right tools and means to fulfill its mandate in the future”. It has even ruled out privatization. This sounds pretty good until you look beyond the reassuring words. An examination of the review’s mandate shows that the government may be looking at some pretty fundamental changes to our universal, public postal system.

The Canada Post Corporation Strategic Review will look at basic questions. What is universal postal service? Should our public post office continue to have an exclusive privilege to handle letters so that it can provide universal service?

Review issues

The government’s review will focus on the following areas:

A. Market and Competition

How have changes in technology, competition and customer demographics shaped the postal market?

What has been the evolution of the markets for lettermail, parcels, advertising mail, and international mail?

What are the emerging needs of postal service customers?

What can be learned from these developments in the postal services markets in other countries?
B. Public Policy Objectives and Responsibilities

What are the costs of the universal service obligation and to what extent do revenues generated by Canada Post’s exclusive mail collection and delivery privilege offset these costs? How are those costs and revenues expected to evolve in the future?

What have been the financial impacts of public policy obligations placed on Canada Post? How are the costs of public policy obligations funded?

What are the social impacts of the universal service obligation?

To what extent do all of the public policy obligations imposed on Canada Post meet the needs of Canadians?

CUPW comments:

At the moment, Canada Post’s universal service obligation (USO) is not defined. The review will have to define the USO in order to cost it. What will be included? What will be left out? We do not know. Costing the USO is really a means of assigning a dollar figure to providing universal postal services. CUPW believes that we have a social responsibility to maintain valued, secure and universally accessible public postal services for everyone. The exclusive privilege provides Canada Post with the funds necessary to finance these services. The review should not be used to identify the costs of the less economical services, such as delivery to isolated areas, in order to justify eliminating or the contracting out of services.

C. Commercial Activities

What are the internal and external challenges and risks faced by Canada Post in its effort to ensure its activities generate reasonable rates of return and contribute to fund its public service obligations?

Which activities or services currently provided should be preserved as exclusive privileges and which ones should be provided in a more competitive environment?

Does Canada Post have sufficient latitude and flexibility to perform successfully in a competitive market environment?

CUPW comments:

This means the review is considering deregulation of Canada Post. Providing Canada Post with an exclusive privilege to handle addressed letters is a form of regulation. Reducing or eliminating this privilege is deregulation.

continued on page 3...
Regulations exist for reasons. Canada Post has an exclusive privilege or monopoly to handle letters so that it is able to generate enough money to provide affordable postal service to everyone, no matter where they live in our huge country, be it a large urban centre or a rural or isolated community. It will become increasingly difficult for our public post office to provide universal postal service if the government erodes or eliminates the very mechanism that funds universal postal service - the exclusive privilege.

Canada Post often talks about the need for more flexibility when referring to the rights and protections in collective agreements. Previous reviews of the post office have taken a superficial look at postal workers’ rights and protections. Their recommendations have contributed to difficult negotiations ending in strikes.

D. Financial and Performance Targets

Are the parameters set out in the 1998 Multi-Year Policy and Financial Framework still valid and provide appropriate accountability?

Is there an appropriate policy and financial framework in place to ensure that Canada Post can compete successfully in the marketplace and meet its public policy obligations?

What are appropriate financial and performance targets for Canada Post that will reflect its dual public and commercial objectives, and support its efforts to improve the corporation’s cost structure and efficiency and meet future infrastructure needs?

How should service delivery standards be established?

Advisory Panel

The government has appointed a three-person advisory panel to conduct its review.

- Robert Campbell
- Nicole Beaudoin
- Daniel H. Bader

Robert Campbell has published two books on postal services in which he has advocated for the end of postal monopolies. In 2002 he published a paper entitled It’s Time for Serious Postal Reform in which he stated “Canada’s postal system should pursue both liberalization and deregulation. Liberalization should gradually remove the exclusive privilege”. To date, the other members of the panel have not written on postal issues.

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Panel members will rely extensively on information provided by Canada Post. It is not clear whether CUPW and others will get to see the corporation's information and rebut it if necessary. Previous reviewers of the post office have complained about the inadequacy of Canada Post's information.

**Submissions**

The review’s advisory panel is not holding public hearings. Panel members are asking individuals and groups to make submissions by September 2, 2008.

CUPW believes that it is irresponsible and unaccountable for the government to conduct a review of Canada Post without doing everything possible to consult with the real owners of the post office – the public.

**Guiding Principles**

The government says that the advisory panel will adhere to guiding principles.

These principles are designed to allay people's fears about the government's review of Canada Post. They rule out privatization and include a promise to maintain universal service. They do not rule out deregulation of Canada Post, which would almost certainly put universal service and our one-price-goes-anywhere postage rate at risk.

For more information, go to the following website: http://www.cpcstrategicreview-examenstrategiquescp.gc.ca/index-eng.html
Hey Harper – Hands off my post office
Say no to postal deregulation

Our universal public postal service – Our vision

The federal government is conducting a review of our post office. It wants individuals and groups to make submissions to the Canada Post Corporation Strategic Review by September 2, 2008. The Canadian Union of Postal Workers will be making a submission that advances our vision of universal, public postal service.

Our public post office delivers. It provides everyone, no matter where they live, with an effective and affordable communication and delivery system. This is no small feat in a huge country with a population spread far and wide.

The post office also provides jobs. And it plays a key role in supporting economic growth by providing the stable infrastructure that communities need to thrive and businesses need to grow.

Will the post office continue to play these roles in the future? This remains to be seen. Currently, there are different views about what role the post office should play in society and what it needs to do to meet the challenges of the future. Post offices around the world face increased competition from both electronic communications and private sector companies. Many are being deregulated and privatized.

While the Canadian Union of Postal Workers (CUPW) recognizes that our post office must adapt to an ever-changing world, we do not support transforming our service-oriented public post office into a profit-driven business through commercial objectives, privatization or deregulation (i.e. eroding or removing Canada Post’s exclusive privilege to handle letters).

There are other ways of dealing with the challenges that our public post office faces in today’s world.

This fact sheet contains an outline of our vision.
CUPW's vision of public postal service

A truly modern post office would:

- Remain a publicly-owned enterprise, responsible to the public and Parliament
- Adhere to its public service mandate
- Retain the exclusive privilege for letters
- Provide door-to-door delivery in urban areas
- Provide rural delivery
- Deliver admail
- Offer industry-leading parcel and courier services to small businesses
- Develop new products and services
- Keep jobs in communities where the work is located
- Maintain post offices in rural and urban communities
- Maximize the amount of work done “in-house” and minimize the “contracting-out” of work
- Provide employees with safe, unionized jobs, fair wages, and good working conditions
- Share the benefits of technological change with workers and the public
- Maximize environmentally-friendly practices
- Invest profits and dividend payments in services, health and safety and good jobs

You can get a copy of Our Vision of the Post Office, with additional details, at: http://www.publicpostoffice.ca
Is the post office a public service or a business?

Our vision is of a post office providing quality, affordable service to everyone no matter where they live, accountable to the public and Parliament. It is very different than the one being promoted by the federal government and Canada Post. Our vision is also in keeping with Canada Post’s mandate under law.

Canada Post has a legal mandate to provide basic postal service while improving service, operating on a financially self-sustaining basis and balancing the objectives of the corporation with the needs of its employees.

Unfortunately, the government’s policy directives for Canada Post are at odds with the corporation’s legal mandate, not to mention what people want from their post office. The government has asked Canada Post to act like a commercial enterprise and provide a commercial rate of return, even though there is no legal requirement for the post office to make business-like profits (See the law is on our side).

The government’s strategic review will consider what financial targets are appropriate for Canada Post. It will also look at whether Canada Post should be deregulated. But that’s a whole other story (See fact sheet #4: Five reasons to oppose deregulation of our post office).

Canada Post President Moya Greene will, in all likelihood, continue to call for commercial profits. She has repeatedly stated that the corporation is a commercial enterprise with a business mandate. She has focused on major customers and profit-making rather than on postal workers, the public and providing a public service.

CUPW doesn’t think that the public and postal workers are likely to fare well with a post office that is increasingly focused on commercial goals instead of public interest objectives.

Just imagine what Canada Post could do if it focused on public service and postal workers, not just its 200 biggest customers. The corporation could build a better, more accountable, transparent and humane postal service – a truly modern post. It could invest profits in keeping post offices open, maintaining rural delivery, expanding door-to-door service and reducing its horrific injury rate – one of the worst in the federal sector.

The law is on our side

There is no good reason for our public post office to focus on profit-making, nor is there a legal requirement for Canada Post to make business-like profits.

Canada Post Corporation Act

Canada Post has a mandate to provide public postal service. The Act says that our public post office should provide basic customary postal service while having regard for "the need to conduct its operations on a self-sustaining financial basis." In addition to asking the corporation to break even, it says the corporation shall declare and pay a dividend if the corporation can and the government decides it wants a dividend.

The Act doesn’t require Canada Post to make profits or pay dividends.

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The Act also says that postage rates shall be fair, reasonable and sufficient to defray the costs incurred by the corporation in the conduct of its operations under this Act. When Canada Post became a Crown corporation in 1981, business groups and others pushed to have this provision included in the Act so that the corporation would not be seen as an easy source of revenue for the government. They wanted money from postage ploughed back into service.

Financial Administration Act (FAA)

The FAA says "there is a reasonable expectation that the corporation [Crown corporations like Canada Post under Part II of Schedule III] will pay dividends" and "ordinarily earns a return on equity."

But there is nothing in the FAA that requires a commercial rate of profit or the kind of dividends that a business might be required to pay.

Government financial and policy framework for Canada Post

The government's financial and policy framework for Canada Post calls on the post office to provide a commercial rate of return (11%) and pay an annual dividend of 40% of net profit. The corporation paid a 15% rate of return in 2005, 8.4% in 2006 and 3.8% in 2007. It has handed over $547 million in dividends to the government in the last 10 years alone.

CUPW wants Canada Post to start acting like the public service it is. While Crown corporations like Canada Post have both public and commercial activities, they are distinct from commercial enterprises in that they are designed to serve the public interest, not maximize profit.

Sources: Canada Post Corporation Act, Canada, R.S., 1985, Section 5(2), 19(2), 27.4 Financial Administration Act, Canada, R.S., 1985, Section 3(5) (a) iii and (b).Section 27.4, Division III, 130.1, 130.2

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CUPW information on the Strategic Review of Canada Post: cupw.ca/StrategicReview

Our universal public postal service – Our vision 4 Strategic Review Fact Sheet 3 • June 2008
Hey Harper – Hands off my post office
Say no to postal deregulation

Five reasons to oppose deregulation of our public post office

The federal government is conducting a very quick and potentially damaging review of our public post office called the Canada Post Corporation Strategic Review. The government has given the review's advisory panel a very broad mandate. It has ruled out privatization, but not deregulation of Canada Post. There are many good reasons to oppose deregulation. Here are five:

1. Deregulation would jeopardize universal postal service

Our public post office provides universal and affordable service. This is no small feat in a country like ours. Canada has the second largest landmass in the world and one of the smallest population densities.

It is the post office’s exclusive privilege or monopoly on letters that allows it to generate enough revenue to provide universal postal service.

When Canada Post was granted the exclusive privilege to deliver letters in 1981, legislators understood that market forces alone could not guarantee a reasonable level of service at affordable prices to all Canadians, especially those living in rural or remote areas. At that time it was estimated that the cost of servicing rural and isolated areas was 'six to ten times' the existing postage rate of a first class letter.

If the government decides to deregulate our post office by reducing or eliminating the exclusive privilege, it will have to dramatically reduce service or find another way of funding universal service. Of course, government subsidies are highly unlikely in this day and age.

Many postal observers believe deregulation would lead to a downward spiral for Canada Post, as private sector competitors focus on profitable areas and services, leaving the unprofitable parts to our public post office. With fewer profits, Canada Post would find it increasingly difficult to provide public postal service, especially in rural and remote parts of the county.

Inside

Deregulation would raise prices, reduce service, destroy jobs, hurt the environment and reduce the security and privacy of the mail • Postage Rates – The Facts
2. Deregulation would result in higher prices, reduced service or both

There appears to be a correlation between countries that have fully deregulated their post offices and higher standard postage rates. See the chart on the back.

Why is this? Once a domestic letter market is fully deregulated, competitors typically focus on profitable urban areas and business mail, leaving unprofitable rural delivery and individual mail to a post office. The post office normally loses part of the lucrative letter business to competitors. At some point, the post office can no longer cross subsidize and finance high cost individual mail and rural delivery with the money it makes from large volume urban mailings because competitors have taken this business.

In addition to rate hikes, the public would likely face service cuts if Canada Post is deregulated. If our post office was to follow the example of Sweden’s deregulated post office, it would cut back or eliminate retail service, especially in rural areas.

Recently, an independent review of the United Kingdom’s deregulated postal sector found that “there have been no significant benefits from liberalisation for smaller businesses and domestic consumers.”

3. Deregulation would destroy jobs and transform good jobs into bad jobs

Deregulation is likely to harm postal workers here in much the same way as it has hurt workers in other countries. Only Sweden and New Zealand have had any long-term experience with postal deregulation. Postal workers in New Zealand suffered a dramatic decline in wage levels after their post office was deregulated in 1998. Thousands of postal workers’ jobs were eliminated by Sweden Post after it was deregulated. Between 1993 and 2005, Sweden Post destroyed 16,000 jobs while the competition created only 2000 jobs.

There are other good reasons to believe that the number and quality of jobs in the postal sector would decline if the letter market is deregulated and opened to competition. A 1996 study conducted by Coopers Lybrand concluded that deregulation would lead to a massive loss of volumes and positions at Canada Post. The financial crisis resulting from volumes and revenues lost to competition would obviously leave our post office with less money to provide workers with decent wages, benefits and working conditions.

Rural areas and women would be hardest hit. A financially-strapped post office would not be able to maintain much service or employment in high-cost rural areas. A review of Canada Post conducted from 1995 to 1996 warned that any reduction in rural service would adversely affect women workers, as the post office is one of the few secure, good paying jobs available to women in rural parts of the country. Indeed, 86.9 per cent of rural counter workers and 71.5 per cent of rural route mail delivery staff are female.

*Finland was deregulated early (1994) but there has been little in the way of competition because new entrants are required to make a very high contribution to a universal service fund if they operate in lucrative, high-density areas.
4. Deregulation would hurt the environment

If the letter market is deregulated and opened to competition, letter companies would vie for business in the same environmentally unsound way as parcel-courier companies. Several competing parcel-courier businesses operate simultaneously in most urban and suburban areas. It is not uncommon to see two or three delivery trucks on the same street on the same day. This system of delivery maximizes fossil fuel consumption, traffic and pollution.

Put another way, if the letter market is opened to competition, the same number of letters would be delivered to the same number of homes and businesses, but these letters would be delivered by more vehicles. This would be damaging from an environmental perspective.

Introducing competition into the letter market would also put financial pressure on Canada Post. This would make it more difficult for the government to insist that our post office operate in a more environmentally-friendly manner or as a role model and leader in good environmental practices. Just as the space program was used to stimulate high-tech industries, the postal service could be used to develop and test environmental practices that could be extended to other industries.

5. Deregulation would reduce the security and privacy of the mail

Deregulation would also jeopardize the security and privacy of the mail. It is currently a federal offence for anyone to open or tamper with mail without the permission of the recipient or a judicial warrant.

The post office employs a highly trained security force whose primary responsibility is security of the mail. Major postal facilities are equipped with elaborate security systems. As a result, senders and recipients of mail may be reasonably confident that the nature of their business or personal correspondence is private and secure.

With the introduction of competition, it would be virtually impossible for the federal government to ensure that a myriad of delivery companies lived up to legislation or regulations requiring security of the mail.

Privacy problems would be compounded by the fact that many competitors would be American-based companies that are subject to the terms of the USA Patriot Act. Under the terms of this Act, American subsidiaries delivering mail in Canada can be required to provide the American government with any records they have concerning the sending or receipt of mail.
Postage Rates – The Facts

- Our country has one of the lowest basic stamp prices in the industrialized world.

- There appears to be a correlation between countries that have fully deregulated their letter market and higher basic stamp prices.

- Countries with considerably greater population density often charge higher rates.

- Ninety-one per cent of respondents to a 1996 Angus Reid poll said that universal postal service at a uniform rate is one of the really great things about Canada Post.

Standard or First Class Letter Rates and Population Density in 11 Countries

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