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FILED

AUG 8 2005

OFFICE OF
WORKER'S COMPENSATION JUDGE
HELENA, MONTANA

IN THE WORKERS' COMPENSATION COURT OF THE STATE OF MONTANA

CATHERINE E. SATTERLEE, et al.

Petitioners,

v.

LUMBERMAN'S MUTUAL CASUALTY
COMPANY, et al.

Respondents/Insurers.

WCC No. 2003-0840

AFFIDAVIT OF PAUL E. POLZIN

STATE OF MONTANA)
 :SS
County of Missoula)

PAUL E. POLZIN, being first duly sworn upon his oath, deposes and says:

1. I am currently the Director of the Bureau of Business and Economic Research at The University of Montana. I have held this position since 1988. I have extensive work experience and academic credentials in the area of economics and economic research. In 1964, I received a B.A. in Economics from the University of

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Michigan. In 1968, I received an M.A. and Ph.D. in Economics from Michigan State University. I have authored 21 peer reviewed publications which focused on different aspects of economics. I have also authored many other publications which dealt with economics. A copy of my Curriculum Vitae is attached hereto as Ex. "6."

2. In preparing this Affidavit, I examined the labor force status of persons age 62 and older, and I also examined their sources of retirement income. I paid particular attention to the changes in the labor force status as persons grow older. I also made gender comparisons and comparisons between those people who receive Social Security retirement benefits versus those people who do not.

3. My opinions are based on my review and interpretation of the data discussed below as well as my education, training and experience in the field of economics. The methodology and unbiased sources I used to gather my data are recognized as authoritative sources in the field of economics and the data are generally accepted and reasonably relied upon by other economists in forming opinions. Lastly, my opinions are provided on a more probable than not basis.

4. In my opinion, the best available data are from the Current Population Survey ("CPS"), which is conducted nationally by the United States Bureau of the Census and the United States Bureau of Labor Statistics. CPS is the primary source of information concerning labor force characteristics of the United States population. CPS is a monthly survey of about 50,000 households and has been conducted for more than 50 years. The sample is scientifically selected to represent the non-institutional population. Respondents are interviewed to obtain information about the employment status of each member of the household 15 years of age and older. CPS data are used by government policymakers and legislators as reliable indicators of our nation's economic situation and for planning and evaluating many government programs. They are also used by the press, students, academics, and the general public.

5. The information concerning labor force status came from the Annual Demographic Survey, which is the March Supplement to CPS. The March Supplement is designed to gather information on more than 50 different sources of income as well as employment status and work patterns.

6. There are no equivalent data for Montana. There is no data source that brings together information concerning the income sources, retirement payments and labor force status of Montanans age 62 and older. It is unlikely that appropriate information will ever be available for Montana. The CPS analyses utilized information gathered from approximately 24,600 individuals age 62 or older. In Montana, there were about 159,400 persons in 2000 who were 60 years of age or older. Therefore, more than 15% of all elderly Montanans would have to be surveyed in order to provide

an equivalent sample. A smaller sample would not be sufficient to analyze the detailed concepts that will be examined later.

7. The analyses utilized CPS data derived from respondents throughout the United States. The national data are appropriate for analyzing labor force status in Montana because: (1) they are the best data available; and (2) statistical measures for analysis were chosen to be least impacted by the differences between the United States and Montana labor markets.

8. Montana does differ from the United States in a number of important attributes. For example, Montanans have lower wages and income than the national average, no matter how wages and income are measured. The following analyses do not use dollar values but percentages or rates specifically to avoid these problems. Furthermore, in one case where comparable state and national data was available, Montana was not consistently above or below the corresponding United States values.

9. The appropriateness of the CPS data for Montana may be evaluated by looking at labor force participation data reported in the 2000 Census of Population. The Census does not report labor force participation by single year of age nor does it identify Social Security recipients, but comparable figures are presented for Montana and the United States. I examined information from the 2000 Census of Population to insure that the national data labor force data are appropriate for Montana. The data from CPS accurately represents, in my opinion, the labor and workforce situation which exists in Montana.

10. Attached hereto as Exhibits 1 and 2 are true and correct copies of CPS documents which present overall characteristics of the 2004 Current Population Survey March Supplement. Exhibit 1 indicates that 24,571 persons age 62 or older were included in the sample. Of those, 10,641 were males and 13,930 were females. As expected, the number of persons in each category declines as age increases. The number of males and females age 80 to 84 are combined in one category, as was the number of persons age 85 and older.

11. The extent of Social Security coverage is presented in Exhibit 2. This exhibit reports the number of persons receiving Social Security retirement benefits (excluding supplemental or disability payments) by age and gender. The number of persons eligible for Social Security must be obtained from the Social Security Administration, and this data may not include information concerning demographic characteristics and/or other sources of income.

12. At age 62, approximately 28% of the males and 37% of the females reported receiving Social Security payment. These percentages rise quickly, and more than one-half of males and females report receiving Social Security payments when

they are 64 years old. About the same percentage of males and females report receiving Social Security payments at 65 years old, and this equality continues throughout the remaining age categories.

13. The percentage of males and females reporting Social Security payments continue to gradually rise after age 65. By their late 70s, about 91% to 92% of both males and females report receiving Social Security retirement payments.

14. With respect to labor force status, persons are classified in the labor force if they are employed, unemployed but seeking employment or in the Armed Forces during the week the survey is conducted. The "civilian labor force" includes all civilians classified as employed or unemployed. The actual determination of a respondent's labor force status was determined by the Bureau of the Census and is reported by a code in the data.

15. Attached hereto as Exhibit 3 is a true and correct copy of a CPS document which presents the labor force status of persons age 62 and older. Looking first at males receiving Social Security retirement payments, among 62 year olds, approximately 16.3% were in the civilian labor force. The corresponding figure for 62-year-old females is about 21%. Exhibit 3 confirms that as the age of the retired person increases, there is a corresponding decrease in the amount of retired workers who earn income from working. For example, for people age 67 who receive Social Security retirement benefits, over two-thirds of them do not earn annual income from working. By age 70, over three-fourths of people who receive Social Security retirement benefits do not earn annual income from work.

16. The highest figures for labor force participation were reported for both males and females age 66. This reflects the fact that the earnings limitations for Social Security recipients does not apply after a person reaches their 65th birthday. The maximum labor force participation is approximately 31% for males and about 25% for females who are 66 years old.

17. Even though males tend to have higher labor force participation rates at every age than females, the trend in the rates is similar for both. The rates for males decline almost every year until reaching about 3% for those age 85 and older. For females, the rates also decline steadily reaching approximately 1% for those age 85 and older.

18. The labor force participation rates are generally higher than for those persons not receiving Social Security retirement payments, but the trends are very similar. The participation rates for both males and females not receiving Social Security decline steadily with age. At age 62, about 70% of the males and roughly 63% of the females not receiving Social Security were in the labor force. For those age 85 or older,

about 9% of the males and roughly 7% of the females were in the labor force. There are no peaks in labor force participation at age 65 or 66 in the percentages of males or females persons in the labor force.

19. Attached hereto as Exhibit 4 is a true and correct copy of a CPS document setting forth labor force participation for broad age categories in Montana and the United States. All of the important features of the CPS data also appear in the Census figures for Montana. Namely, males have higher labor force participation than females, and labor force participation declines with age. In addition, the Montana figures are nearly identical to those for the United States with no tendency for the Montana rates to be consistently above or below the corresponding national rates.

20. After collecting and examining the data discussed above, I have formed the following opinions:

- a. Labor force participation is higher for persons not receiving Social Security retirement payments;
- b. Males have higher labor force participation than females;
- c. After a peak at age 66, there is a steady decline in labor force participation for males receiving Social Security. For those 85 and older, only about 3% are in the labor force;
- d. For females receiving Social Security, after a peak at age 66, there is also a steady decline in labor force participation. For those 85 and older, only about 1% are in the labor force; and
- e. The above trends in the CPS figures are also present in Montana.

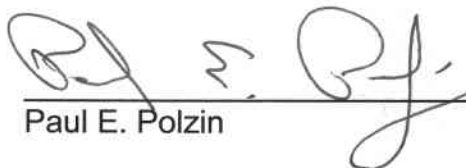
21. Attached hereto as Exhibit 5 is a true and correct copy of a CPS document which details the sources of retirement income for persons age 62 and older. For males receiving Social Security payments, approximately 40% of those age 62 and older also receive retirement income from another source. Company or union retirement payments were the largest single source, followed by government and military pensions. Among females receiving Social Security, the percent receiving other pensions were generally lower than for males, but company/union pensions and government/military pensions were still the two largest sources.

22. For persons not receiving Social Security, the overall percentages having retirement income are lower, perhaps reflecting the fact that they are still in the labor force. For males not receiving Social Security, approximately 18% of those age 62 to 65 reported another retirement income source, and this percentage rose to about 25%

for those age 71 and older. For females not reporting Social Security payments, approximately 10% of those age 62 to 65 years old reported other retirement sources, and the corresponding figure for females age 71 and older was approximately 17%.

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

DATED this 8th day of August, 2005.

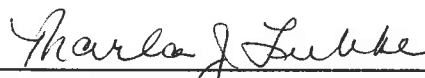


Paul E. Polzin

SUBSCRIBED AND SWORN to before me this 8 day of August, 2005.



MARLA J. LUBKE
NOTARY PUBLIC-MONTANA
Residing at Missoula, Montana
My Comm. Expires Jan. 21, 2006



NOTARY PUBLIC for the State of Montana
Residing at: _____, Montana
My Commission Expires: _____

Exhibit 1
Persons, by Gender and Age
United States, March 2004

Age	Males	Females	Total	
			Number	Percent
62	644	778	1,422	5.8
63	698	761	1,459	5.9
64	596	725	1,321	5.4
65	705	755	1,460	5.9
66	638	672	1,310	5.3
67	520	614	1,134	4.6
68	498	612	1,110	4.5
69	471	621	1,092	4.4
70	460	530	990	4.0
71	468	590	1,058	4.3
72	400	523	923	3.8
73	482	548	1,030	4.2
74	408	531	939	3.8
75	377	547	924	3.8
76	393	544	937	3.8
77	422	521	943	3.8
78	341	504	845	3.4
79	277	405	682	2.8
80 to 84	1,154	1,759	2,913	11.9
85+	689	1,390	2,079	8.5
	10,641	13,930	24,571	100.0

Source: U.S. Bureau of the Census and U.S. Bureau of Labor Statistics, Current Population Survey, March 2004 Supplement.

Exhibit 2
Persons Receiving Social Security Retirement Payments
By Gender and Age
United States

Age	Males				Females				
	With Social Security Payments		Without Social Security Payments		With Social Security Payments		Without Social Security Payments		
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	
62	178	27.6	466	72.4	291	37.4	487	62.6	
63	325	46.6	373	53.4	410	53.9	351	46.1	
64	302	50.7	294	49.3	428	59.0	297	41.0	
65	539	76.5	166	23.5	578	76.6	177	23.4	
66	540	84.6	98	15.4	563	83.8	109	16.2	
67	446	85.8	74	14.2	523	85.2	91	14.8	
68	426	85.5	72	14.5	542	88.6	70	11.4	
69	411	87.3	60	12.7	562	90.5	59	9.5	
70	397	86.3	63	13.7	460	86.8	70	13.2	
71	426	91.0	42	9.0	523	88.6	67	11.4	
72	345	86.3	55	13.8	473	90.4	50	9.6	
73	427	88.6	55	11.4	476	86.9	72	13.1	
74	370	90.7	38	9.3	473	89.1	58	10.9	
75	342	90.7	35	9.3	488	89.2	59	10.8	
76	353	89.8	40	10.2	500	91.9	44	8.1	
77	388	91.9	34	8.1	473	90.8	48	9.2	
78	313	91.8	28	8.2	456	90.5	48	9.5	
79	254	91.7	23	8.3	372	91.9	33	8.1	
80 to 84	1,050	91.0	104	9.0	1,624	92.3	135	7.7	
85+	623	90.4	66	9.6	1,262	90.8	128	9.2	
Total	8,455	79.5	2,186	20.5	11,477	84.2	2,453	17.6	
									13,930

Source: U.S. Bureau of the Census and U.S. Bureau of Labor Statistics, Current Population Survey, March 2004 Supplement.

Exhibit 3
Civilian Labor Force Status, By Age and Gender

Age	Receiving Social Security Payments				Not Receiving Social Security Payments			
	Males in CLF		Females in CLF		Males in CLF		Females in CLF	
	Number	Percent of Males Receiving SS	Number	Percent of Females Receiving SS	Number	Percent of Males Not Receiving SS	Number	Percent of Females Not Receiving SS
62	29	16.3	61	21.0	324	69.5	308	63.2
63	73	22.5	89	21.7	289	77.5	204	58.1
64	64	21.2	81	18.9	201	68.4	171	57.6
65	166	30.8	142	24.6	104	62.7	85	48.0
66	168	31.1	139	24.7	56	57.1	42	38.5
67	130	29.1	119	22.8	34	45.9	30	33.0
68	116	27.2	127	23.4	34	47.2	17	24.3
69	109	26.5	114	20.3	17	28.3	19	32.2
70	90	22.7	68	14.8	23	36.5	17	24.3
71	91	21.4	65	12.4	15	35.7	17	25.4
72	66	19.1	62	13.1	21	38.2	5	10.0
73	68	15.9	44	9.2	20	36.4	8	11.1
74	53	14.3	45	9.5	10	26.3	6	10.3
75	55	16.1	40	8.2	3	8.6	13	22.0
76	39	11.0	35	7.0	9	22.5	5	11.4
77	39	10.1	30	6.3	4	11.8	4	8.3
78	42	13.4	28	6.1	5	17.9	3	6.3
79	22	8.7	13	3.5	5	21.7	2	6.1
80 to 84	65	6.2	52	3.2	18	17.3	12	8.9
85+	21	3.4	13	1.0	6	9.1	9	7.0
Total	1506	17.8	1367	11.9	1198	54.8	977	39.8

Source: U.S. Bureau of the Census and U.S. Bureau of Labor Statistics, Current Population Survey, March 2004 Supplement.

Exhibit 4
 Civilian Labor Force Status, By Age and Gender
 Montana and the U.S.
 2000

	Males		Females	
	Montana	United States	Montana	United States
Population 60 to 64 years Old	19,102	5,114,578	19,140	5,673,401
Civilian Labor Force	9,722	2,773,103	7,190	2,256,302
Percent	50.90	54.22	37.57	39.77
Population 65 to 69 years Old	15,713	4,415,402	16,606	5,153,797
Civilian Labor Force	4,938	1,332,979	3,628	1,026,205
Percent	31.43	30.19	21.85	19.91
Population 70 years Old and Over	37,350	9,966,968	51,262	15,442,805
Civilian Labor Force	5,625	1,311,955	3,405	967,606
Percent	15.06	13.16	6.64	6.27

Source: U.S. Bureau of the Census. 2000 Census of Population.

Exhibit 5
Retirement Income by Source

			Persons			Percent					
			62 to 65	66 to 70	71 and older	62 to 65	66 to 70	71 and older			
Not Receiving Social Security	Male	Retirement income source	None	1,064	278	352	81.9	75.7	67.7		
			Company/union pension	114	43	42	8.8	11.7	8.1		
			Federal government retirement	40	20	67	3.1	5.4	12.9		
			US military retirement	24	0	3	1.8	0.0	0.6		
			State/local government retirement	43	12	24	3.3	3.3	4.6		
			US Railroad Retirement	4	10	24	0.3	2.7	4.6		
			Reg pay-annuities/paid insura	3	0	2	0.2	0.0	0.4		
			Reg pay-IRA,KEOGH, or 401(3	1	2	0.2	0.3	0.4		
			Other sources or don't know	4	3	4	0.3	0.8	0.8		
			Total	1,299	367	520	100.0	100.0	100.0		
			Female	Retirement income source	None	1,170	332	618	89.2	83.2	83.3
					Company/union pension	45	24	21	3.4	6.0	2.8
					Federal government retirement	30	20	41	2.3	5.0	5.5
US military retirement	0	0			0	0.0	0.0	0.0			
State/local government retirement	54	16			36	4.1	4.0	4.9			
US Railroad Retirement	3	5			16	0.2	1.3	2.2			
Reg pay-annuities/paid insura	2	0			3	0.2	0.0	0.4			
Reg pay-IRA,KEOGH, or 401(2	0			0	0.2	0.0	0.0			
Other sources or don't know	6	2			7	0.5	0.5	0.9			
Total	1,312	399			742	100.0	100.0	100.0			
Receiving Social Security											
Male	Retirement income source	None			805	1,256	2,700	59.9	56.6	55.2	
		Company/union pension			380	661	1,531	28.3	29.8	31.3	
		Federal government retirement	35	75	182	2.6	3.4	3.7			
		US military retirement	24	53	79	1.8	2.4	1.6			
		State/local government retirement	81	144	304	6.0	6.5	6.2			
		US Railroad Retirement	2	3	8	0.1	0.1	0.2			
		Reg pay-annuities/paid insura	3	5	14	0.2	0.2	0.3			
		Reg pay-IRA,KEOGH, or 401(8	11	32	0.6	0.5	0.7			
		Other sources or don't know	6	12	41	0.4	0.5	0.8			
		Total	1,344	2,220	4,891						
		Female	Retirement income source	None	1,359	2,041	5,560	79.6	77.0	78.1	
				Company/union pension	211	363	988	12.4	13.7	13.9	
				Federal government retirement	9	22	95	0.5	0.8	1.3	
US military retirement	3			2	7	0.2	0.1	0.1			
State/local government retirement	103			190	368	6.0	7.2	5.2			
US Railroad Retirement	1			1	7	0.1	0.0	0.1			
Reg pay-annuities/paid insura	3			7	24	0.2	0.3	0.3			
Reg pay-IRA,KEOGH, or 401(6			10	33	0.4	0.4	0.5			
Other sources or don't know	12			14	38	0.7	0.5	0.5			
Total	1,707			2,650	7,120	100.0	100.0	100.0			

Source: U.S. Bureau of the Census and U.S. Bureau of Labor Statistics, Current Population Survey, March 2004 Supplement.