

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES FEES AND CLASSIFICATIONS, 1996)

Docket No. MC96-3

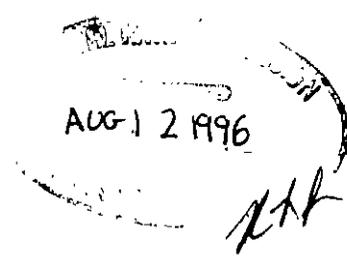
NASHUA PHOTO, INC. AND MYSTIC COLOR LAB  
SECOND INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO UNITED STATES POSTAL SERVICE (NM/USPS 28-36)  
(August 12, 1996)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice,  
Nashua Photo Inc. and Mystic Color Lab hereby submit interrogatories and document  
production requests. If necessary, please redirect interrogatories and/or requests to a more  
appropriate Postal Service witness.

Respectfully submitted,



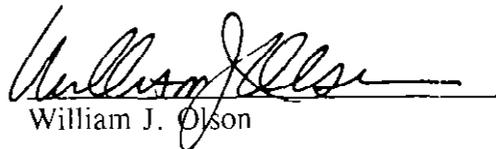
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Counsel for Nashua Photo Inc. and  
Mystic Color Lab

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of  
record in this proceeding in accordance with Section 12 of the Rules of Practice.



William J. Olson

August 12, 1996

**NM/USPS-28.**

- a. For FY 1995 (or the most recent year prior to 1995 if data are not available for 1995), of those mailers that used BRM and maintained an advance deposit account, how many or what percentage did not qualify for the BRMAS rate because their mail was non-automatable?
- b. Please state the other most important reasons why mailers that used BRM and maintained an advance deposit account did not qualify for the BRMAS rate.

**NM/USPS-29.**

For those mailers that (i) use BRM, (ii) maintain an advance deposit account, but (iii) do not qualify for the BRMAS rate, please indicate

- a. the nature of the business or type of industry in which most such mailers are engaged (or which account for the largest share of BRM mail that does not qualify for the BRMAS rate);
- b. the most common types of mail (*e.g.*, flats, small parcels, etc.); and
- c. the range within which the annual volumes of such BRM mail would be expected to fall for a typical BRM user.

**NM/USPS-30.**

For those mailers that (i) use BRM, (ii) maintain an advance deposit account, but (iii) do not qualify for the BRMAS rate, please indicate

- a. the number or percentage of such mailers for whom the Postal Service weighs and/or accounts for each incoming piece of BRM separately;
- b. the number or percentage of such mailers for whom the Postal Service (or the mailer) uses some form of "weight averaging" to estimate the postage and BRM fees due (*e.g.*, where a sample is weighed and rated and the results are then applied to the total weight of incoming mail);
- c. the number or percentage of such mailers for whom the Postal Service permits the mailer to prepare some form of incoming manifest system to estimate the postage and BRM fees due; and
- d. the number or percentage of such mailers for whom the Postal Service (or the mailer) estimates the total revenue due the Postal Service in some other manner that is designed to avoid the handling and accounting for BRM as individual pieces. Please provide a brief description of such other methods known to be in use.

**NM/USPS-31.**

Please consider the Postal Service's offering of a new, lower rate for bulk non-automatable, non-barcoded Business Reply Mail where alternative handling and verification procedures are utilized, thereby avoiding individual processing of pieces (such as the incoming manifesting system used for Nashua's mail, and the weight averaging system used for Mystic's mail).

- a. Please identify any operational problems created by the offering of such a rate and new product.
- b. Would offering such a product create an unacceptable increase in the complexity of BRM rates or products?
- c. Assuming that the Postal Service's costs of such product are properly identified and measured, and an appropriate rate is charged, please identify all arguments against such a proposal.
- d. Please identify the factors that should be considered in determining the minimum volumes, as well as the period over which such minimum volumes are applied, for a mailer to qualify for such a bulk service.

**NM/USPS-32.**

Please identify all recurring and nonrecurring per-piece costs incurred by the Postal Service associated with Nashua's use of Business Reply Mail.

**NM/USPS-33.**

Please identify all recurring and nonrecurring per-piece costs incurred by the Postal Service with respect to Mystic's use of Business Reply Mail.

**NM/USPS-34.**

With respect to Nashua's manifesting system for incoming BRM, what degree of accuracy is considered to be minimally acceptable? What degree of accuracy has been obtained thus far, and what changes can be made to increase that degree of accuracy, if necessary?

**NM/USPS-35.**

With respect to the weight averaging system used by the Postal Service to account for Mystic's BRM, what degree of accuracy is considered to be minimally acceptable? What degree of accuracy has been obtained thus far, and what changes can be made to increase that degree of accuracy, if necessary?

**NM/USPS-36.**

- a. Please confirm that BRMAS rates are currently charged even at locations where BRMAS mail is handled entirely manually (*i.e.*, not handled on automation).

- b. Please provide the Postal Service's best estimate of the percentage of BRMAS rate mail which is handled manually.
  
- c. Please explain the reasons supporting the eligibility of mail handled manually for BRMAS automation rates.