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

SEP 25 4 25 PM '96

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF  
NASHUA PHOTO, INC. AND MYSTIC COLOR LAB  
(NM/USPS-20)

On September 23, 1996, the United States Postal Service filed a document which purported to include responses to the following Nashua/Mystic interrogatories: NM/USPS-8-11, 13-20, 22-27.

The response to NM/USPS-20 was intended to be filed as part of that document, but was inadvertently omitted from the final version of the document which was filed with the Commission and from which service copies were made. The Postal Service regrets this oversight and files a copy of that response here. A copy of the response was sent by FAX to counsel for Nashua/Mystic/Seattle yesterday. To the extent that a Motion For Late Acceptance is deemed necessary to accompany the instant filing of the response to NM/USPS-20, the Commission is invited to interpret the instant pleading as such a pleading.

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RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF NASHUA/MYSTIC

NM/USPS-20.

For purposes of your answer to this question, please make the following assumptions:

- i. pre-barcoded BRMAS mail is segregated into separate sorter stackers for purposes of generating a "bill" for each customer;
- ii. a number of the sorter stackers contain a volume of mail just above the minimum level necessary to justify automated processing (*i.e.*, the minimum level which you identified in the response to preceding interrogatory NM/USPS-19);
- iii. after the "bill" is prepared and the mail is removed from the sorter stacker, the mail must be "street" delivered by the carrier (*i.e.*, the low volume does not justify a plant pick up by the customer); and
- iv. the carrier receives non-BRM letter mail presorted on either a DBCS or a CSBCS.

Please describe fully how BRMAS mail is integrated with other letter mail for delivery, including whether the BRMAS pieces are inserted manually, sorted into route sequence on automated equipment, or handled some other way. If the procedure differs based on whether a DBCS or CSBCS is used, please explain fully.

RESPONSE:

It is expected that a carrier receiving BRMAS mail would either put the bundle in a sack to be delivered to the firm; or place the BRMAS bundle in with the mail for the firm and tie it out as one bundle; or place the bundle of BRMAS mail in the relay container and deliver it with the rest of the customer's mail.

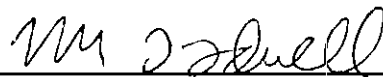
The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

A handwritten signature in black ink, appearing to read "M T Tidwell", written over a horizontal line.

Michael T Tidwell

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September 25, 1996

## CERTIFICATE OF SERVICE

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



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Michael T Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
September 25, 1996