

ORIGINAL

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

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SPECIAL SERVICES FEES AND CLASSIFICATIONS, 1996)

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY  
Docket No. MC96-3

NASHUA PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.  
OBJECTIONS TO INTERROGATORIES USPS/NMS-T1-19-21  
(November 4, 1996)

Nashua Photo Inc. ("Nashua"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") (hereinafter collectively "NMS"), hereby object to interrogatories nos. 19, 20, and 21, propounded by the Postal Service (USPS/NMS-T1-19-21) to the extent that they (i) seek information about their BRMAS mailing volumes wholly unrelated to the type of non-barcoded, non-automatable BRM mail which is the subject of the NMS proposal in this docket, (ii) seek information not maintained in the manner requested the production of which would be extremely burdensome, requiring hundreds of separate calculations, and (iii) seek confidential and proprietary information.

Each of these three interrogatories by its language seeks percentage breakdowns of certain daily, weekly and monthly current volumes received "separately for each mailer, and separately for BRMAS and non-BRMAS..." for an entire year's period.

First, the information requested by these interrogatories is not limited to incoming orders for developing and photofinishing, all of which are currently handled as Business Reply Mail and not BRMAS mail, the only topic of relevance in this docket. Any BRMAS promotional mailings do not involve non-automatable, non-barcoded mail (which do not currently qualify for BRMAS treatment), are not in any way relevant to the subject of the Nashua/Mystic/Seattle proposal, and are therefore objectionable. Moreover, the number of

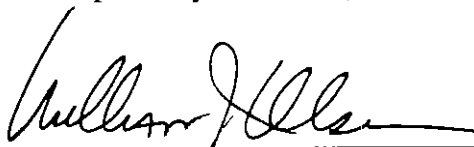
pieces disseminated in promotional mailings, and the number of pieces returned, as well as when they are returned and the percentage, are considered to be highly confidential and proprietary.

Moreover, since the information sought is not collected in the manner requested, its production by these mailers is unduly burdensome and cannot be justified by any need for information of the level of detail requested. For example, there are as many as 300 possible calculations requested for each of these three firms (Nashua, Mystic and Seattle) in interrogatory no. 19, as well as scores of additional calculations for weeks and months in interrogatories 20 and 21. Nevertheless, in an effort to be responsive, Nashua, Mystic and Seattle will provide such information as is reasonably available for incoming BRM that is subject to computation of postage due either by weight averaging or by the incoming manifest system, which should be representative of the pertinent data requested.

Lastly, disclosure of certain of the information requested (particularly including volume distributions by day, week, and month for mail currently handled as BRM but which would be eligible for BRMAS under the NMS proposal) could reveal matters of confidential operational information and market characteristics which are viewed and held as confidential and proprietary by Nashua, Mystic and Seattle. These percentage breakouts cannot be provided for the public record, but the responses, individually by each company, will be offered to the Postal Service pursuant to the terms of a protective order of the sort that has

been used with respect to the disclosure of other confidential and proprietary information contained in Nashua/Mystic/Seattle Witness Haldi Workpaper No. 2, and been used with respect to Postal Service disclosure of certain confidential and proprietary information as well.

Respectfully submitted,



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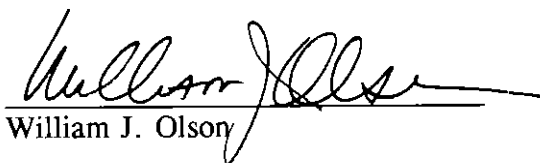
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Counsel for Nashua Photo Inc.,  
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Seattle FilmWorks, Inc.

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.

  
William J. Olson

November 4, 1996