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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., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
MOTION FOR LEAVE TO WITHDRAW PROPOSAL
FOR NON-AUTOMATABLE BULK BUSINESS REPLY MAIL AND
JOINT MOTION FILED WITH THE U.S. POSTAL SERVICE
TO CANCEL HEARINGS ON CERTAIN REBUTTAL TESTIMONY
(December 17, 1996)

Nashua Photo Inc. ("Nashua"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle"), also referred to jointly herein as the "movants," respectfully file this joint motion to withdraw the Nashua/Mystic/Seattle proposal for creation of a special service fee category relating to nonautomatable, bulk business reply mail that they have heretofore advanced herein. Further, the United States Postal Service joins with movants to ask the Commission to cancel hearings on certain rebuttal testimony now scheduled for December 17, 1996.

The Nashua/Mystic/Seattle proposal was set out in the Direct Testimony of Dr. John Haldi (NMS-T-1) filed herein on October 9, 1996. The Postal Service filed rebuttal testimony with respect to the Nashua/Mystic/Seattle proposal through two witnesses, Joe DeMay (USPS-RT-5) and Gary Infante (USPS-RT-6), on December 6, 1996. (Cross-examination of these two witnesses is now scheduled for Tuesday, December 17, 1996.)

On Friday, December 13, 1996, the Postal Service filed a Request for a Recommended Decision on Experimental Nonletter-Size Business Reply Mail Categories and Fees within the context of a new experimental mail classification case under Rule 67, and the

DEC 16, 1996
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case has been designated as Docket No. MC97-1. The Postal Service's Request is supported by the testimony of three witnesses, and the Postal Service has filed a motion for expedited treatment of its proposal.

The Postal Service's proposal is for an experimental classification during a two-year period, while the Nashua/Mystic/Seattle proposal is for a permanent classification change. Further, the respective proposals differ with respect to the proposed structure and nature of fees to be paid by mailers. Nevertheless, Nashua/Mystic/Seattle are of the view that the Postal Service's proposal is a not unreasonable way to proceed in an effort to produce a needed change in this area of Business Reply Mail and movants intend to intervene in and be supportive of the Postal Service's proposal in Docket No. MC97-1.

Accordingly, Nashua/Mystic/Seattle hereby seek leave to withdraw their proposal in this Docket as advanced by Dr. John Haldi, preferring to see the Postal Service's proposal on the same matter considered by the Commission within the context of Commission Docket No. MC97-1.

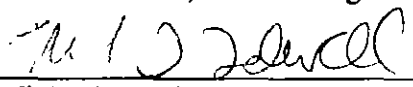
In view of the fact that Postal Service witnesses Joe DeMay and Gary Infante are currently scheduled to testify on December 17, 1996, with respect to their testimony in rebuttal to the Nashua/Mystic/Seattle proposal in this docket, the Postal Service joins with the movants in asking the Commission to cancel the hearings scheduled for those two witnesses for that date.

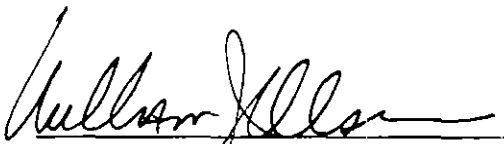
Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

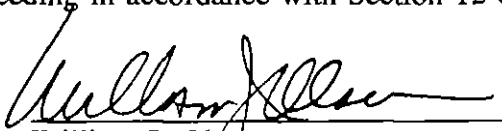

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Seattle FilmWorks, Inc.

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

December 17, 1996