

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

RECEIVED

MAR 23 4 59 PM '00

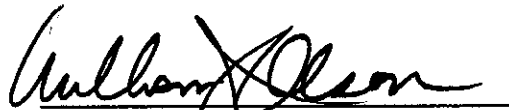
POSTAL RATE AND FEE CHANGES, 2000)

Docket No. R2000-1
OFFICE OF THE SECRETARY

DISTRICT PHOTO, INC.
MYSTIC COLOR LAB
COX SAMPLING
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS JOSEPH D. MOELLER (DMC/USPS-T35-7-8)
(March 23, 2000)

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

Respectfully submitted,



William J. Olson

John S. Miles

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3860

(703) 356-5070

Counsel for:

District Photo, Inc.

Mystic Color Lab

Cox Sampling

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

March 23, 2000

DMC/USPS-T35-7.

At pages 1-2 of your testimony, you discuss the Standard Mail parcel barcode discount. According to Attachment A of the Request of the United States Postal Service for a Recommended Decision on Changes in Rates of Postage and Fees for Postal Services (January 12, 2000) at page 16, this discount applies to residual shape mailpieces that are entered at designated facilities, bear a barcode specified by the Postal Service, are prepared as specified by the Postal Service, and meet all other preparation and machinability requirement of the Postal Service.

- a. Which facilities have been and/or will be designated to receive parcels receiving the discount? If not known, what type of facilities will be designated?
- b. What are the specifications for the barcode which the parcel must bear to qualify for the discount?
- c. In order for parcels to qualify for the discount, must they conform with any specified dimensions (*e.g.*, minimum or maximum)?
- d. Will any address placement requirements be imposed on parcels to qualify for the discount?
- e. Can all Standard A parcels (*i.e.*, IPP machinable, IPP non-machinable, Parcel machinable and Parcel Outside) qualify for the barcode discount? If not, what machinability requirements will the Postal Service impose on parcels to qualify for the discount? Will they be the same as DMM C050.4.0 and DMM 5.0?
- f. Please identify any other mail makeup requirements which will be imposed on parcels before they qualify for the discount.

- g. What cost savings have been modeled or identified with the discount requirements?
- h. How much of a passthrough of cost savings does the discount represent?
- i. What is the TYAR volume estimate for parcels receiving the barcode discount?

DMC/USPS-T35-8.

Please identify all competitors of the Postal Service which impose a parcel or “residual shape” surcharge on packages.