

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

POSTAL RATE AND FEE CHANGES, 1997 )

Docket No. R97-1

NASHUA PHOTO INC., DISTRICT PHOTO INC.,  
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.  
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO POSTAL SERVICE WITNESS LESLIE M. SCHENK (NDMS/USPS-T27-1-5)  
(August 29, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice and procedure, Nashua Photo Inc. (hereinafter "Nashua"), District Photo Inc. ("District"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") (hereinafter collectively referred to as "NDMS"), proceeding jointly herein, hereby submit the following 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

Alan Woll

William J. Olson, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Nashua Photo Inc., District Photo Inc.,  
Mystic Color Lab, and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

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



William J. Olson

August 29, 1997

**NDMS/USPS-T27-1.**

At p. 6 of your testimony you state that “only 14 percent of BRMAS-qualified BRM is counted and rated on a BRMAS operation.”

- a. For those pieces that **are** counted and rated on a BRMAS operation, what is the total unit cost of all counting and rating activities performed by the Postal Service?
- b. For the 86 percent of BRMAS-qualified BRM that **are not** counted and rated on a BRMAS operation, what is the unit cost of all counting and rating activities performed by the Postal Service?

**NDMS/USPS-T27-2.**

- a. Please confirm that for Test Year After Rates the BRMAS coverage factor is estimated at only 5.87 percent in USPS-27C.
- b. In Base Year 1996, how many facilities used automated BRMAS equipment to process BRM paying the BRMAS rate?
- c. In Test Year After Rates, how many facilities were expected to process BRM on automated BRMAS equipment?

**NDMS/USPS-T27-3.**

For a P&DC that has the capability to run BRMAS on its automated equipment, what is the estimated minimum daily volume of automatable BRM below which it is more practical to send all BRM to the postage due unit rather than use BRMAS? To the extent that the minimum daily volume may vary by location, please explain all important factors that would enter into the decision to prefer use of the postage due unit rather than BRMAS.

**NDMS/USPS-T27-4.**

- a. For each year since Docket No. R90-1, what has been the BRMAS coverage factor?
- b. What are the major reasons why the BRMAS coverage factor has never reached the levels anticipated by the Postal Service in Docket No. R90-1?
- c. What sense does it make to have a "BRMAS Program" when the coverage factor is less than 6 percent, and declining?

**NDMS/USPS-T27-5.**

Your testimony at p. 13 states that "a new BRMAS program is expected to be in place during the test year."

- a. What is the new BRMAS program? Please provide a brief explanation and submit a copy of the program as a library reference.
- b. When is implementation of the new BRMAS program expected to begin, and when is full implementation expected to be accomplished?
- c. How does the new BRMAS program differ from the old BRMAS program?
- d. What is the expected effect of the new BRMAS program on the BRMAS coverage factor?