

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

POSTAL RATE AND FEE CHANGES, 1997)

Docket No. ~~SEP-9~~ 4 45 PM '97

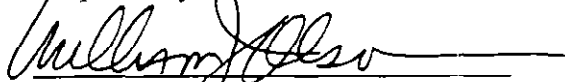
RECEIVED

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

NASHUA PHOTO INC., DISTRICT PHOTO INC.,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
THIRD INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTAL SERVICE WITNESS RALPH J. MODEN (NDMS/USPS-T4-19-20)
(September 9, 1997)

Pursuant to sections 25 and 26 of the Postal Rate Commission rules of practice, 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

September 9, 1997

NDMS/USPS-T4-19.

Please refer to your response to OCA/USPS-T4-5, which identifies "New Design Flat Sorting Machines" among various mail processing equipment planned for deployment by the end of FY 1999.

- a. Will this new flat sorter be equipped with a high speed flat feed mechanism? If so, please describe its capabilities. If not, how will flats be inducted into the machine?
- b. Please provide a comparison of the new flat sorter with both the FSM 881 and FSM 1000 in terms of :
 - (i) throughput per hour;
 - (ii) number of stackers/separations;
 - (iii) staffing requirements;
 - (iv) minimum and maximum dimensions of mail pieces accepted;
 - (v) flexibility requirements for mailpieces inducted into the machine; and
 - (vi) perceived advantages/improvements offered by the new flat sorter.
- c. Will the new flat sorter be deployed as a **replacement** for either the FSM 881 or the FSM 1000, or **in addition to** the FSM 881s and FSM 1000s that are already deployed or scheduled for deployment? Please explain fully how the new flat sorter affects and fits into the Postal Service's plans for the mechanized/automated sortation of flats.
- d. Does the new flat sorter represent (i) automated or (ii) mechanized processing of flats? If the latter is your response, please explain what would be required in order for flats processing to reach the threshold that the Postal Service regards as automated processing.

NDMS/USPS-T4-20.

Please see NDMS/USPS-T4-2 and your response thereto.

- a. How many SPBSs now have barcode readers? How many of these SPBSs have been deployed at (i) BMCs? (ii) P&DCs?
- b. How many SPBSs have been deployed at (i) BMCs? (ii) P&DCs?
- c. Please explain whether (and when) SPBSs are used for incoming secondary sortation at P&DCs.