

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

POSTAL RATE AND FEE CHANGES, 1997 )

RECEIVED  
SEP 10 4 16 PM '97  
Docket No. R97-1  
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

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 CARL G. DEGEN (NDMS/USPS-T12-1-2)  
(September 10, 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,

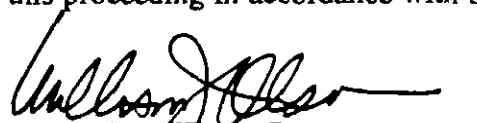


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Counsel for Nashua Photo Inc., District Photo Inc.,  
Mystic Color Lab, and Seattle FilmWorks, Inc.

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 10, 1997

**NDMS/USPS-T12-1**

Please refer to your response to NAA/USPS-T12-2.

- a. Please explain how costs represented by the 8,128 tallies in the "Not-Identified Mixed Containers" category are distributed to the classes and subclasses of mail.
- b. Please explain how costs represented by the 88,854 tallies in the "Not-Handling" category are distributed to the classes and subclasses of mail.
- c. How is the variance of unit cost estimates affected by the fact that 48 percent of all tallies are either "Not-Identified" or "Not-Handling" mail?

**NDMS/USPS-T12-2**

Please refer to your response to NAA/USPS-T12-2 and provide the following information for FY96:

- a. The total number of mail processing tallies (at all facilities).
- b. The total number of direct tallies.
- c. The number of mixed mail tallies (broken down into: "Counted" mixed mail item, "Uncounted" mixed mail item, "Identified" mixed mail container, and "Not-Identified" mixed mail container categories).
- d. The number of "Not-Handling" mail tallies.