

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

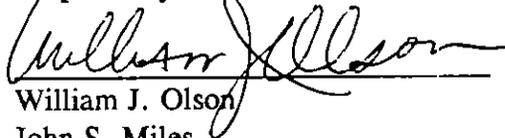
POSTAL RATE AND FEE CHANGES, 1997)

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Docket No. R97-1
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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 JOSEPH D. MOELLER (NDMS/USPS-T36-1-3)
(September 11, 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

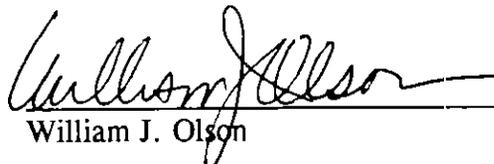
McLean, Virginia 22102-3823

(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 11, 1997

NDMS/USPS-T32-1.

- a. What is the average cost of Standard A ECR parcels?
- b. What is the average revenue from Standard A ECR parcels?
- c. For Standard A ECR parcels, your proposed surcharge of 10 cents represents what percent of the difference between revenues and costs?

NDMS/USPS-T36-2.

- a. What is the average cost of Standard A Regular parcels?
- b. What is the average revenue from Standard A Regular parcels?
- c. For Standard A Regular parcels, your proposed surcharge of 10 cents represents what percent of the difference between revenues and costs?

NDMS/USPS-T36-3.

Please refer to your response to DMA/USPS-T4-23 (redirected from witness Moden). Please define the term "low passthrough" as you use it in that interrogatory response, and explain how one would distinguish a low passthrough from a moderate or high passthrough.