

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

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POSTAL RATE AND FEE CHANGES, 1997)

Docket No. 1897-4 38 PM '97

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 SHARON DANIEL (NDMS/USPS-T29-1-3)
(September 16, 1997)

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

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

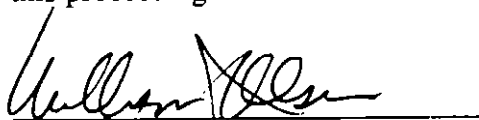
McLean, Virginia 22102-3823

(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 16, 1997

NDMS/USPS-T29-1.

Please refer to USPS witness Fronk's revised reply to NDMS/USPS-T32-1, in which Fronk describes you as "the analyst with principal responsibility for the library reference [H-112]."

- a. Did you prepare, or participate in any way in the preparation of, LR-H-112?
- b. Unless your answer to preceding subpart (a) is an unqualified negative, please describe in detail your role in preparing the study contained in LR-H-112. Please explain your role as "the analyst with principal responsibility for the library reference."
- c. Does your testimony, USPS-T-29, reference or rely on LR-H-112 in any way? If so, please explain.

NDMS/USPS-T29-2.

- a. Prior to preparing the updated study contained in LR-H-112, were you or any of the other authors of the study aware that the Commission described the original version of the same study as "distorted by the inability to exclude costs pertaining to first-class mail over one ounce which is not being subject to a surcharge?" (*Opinion and Recommended Decision*, Docket No. MC73-1, note 1, pp. 25-26.)
- b. If you or any other author of the study were aware of the Commission's criticisms, please describe all concepts that were considered to take the Commission's position into account, and explain why each was rejected.

NDMS/USPS-T29-3.

Does the Postal Service have a mail flow model (or models) for estimating the cost of processing Standard A parcels, similar to the models used to estimate the mail processing cost for Standard A letters and flats?

- a. If so, please provide a copy or reference to where all such models can be found, along with current data on unit costs.
- b. If not, please explain why, under the circumstances of this case and the proposed surcharge, the Postal Service has not developed such a model.