

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

POSTAL RATE AND FEE CHANGES, 1997 )

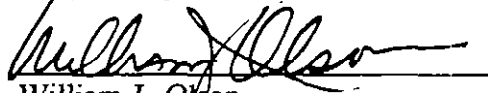
Docket No. 89-16 4 39 PM '97

RECEIVED  
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NASHUA PHOTO INC., DISTRICT PHOTO INC.,  
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.  
SIXTH INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO POSTAL SERVICE WITNESS DAVID R. FRONK (NDMS/USPS-T32-47-52)  
(September 16, 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,



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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-T32-47.**

Please refer to the attachment to your response to MMA/USPS-T32-1.

- a. According to that response, in Base Year 1996 the number of prebarcoded single piece Non-Presort First Class flats that weighed no more than 1 ounce amounted to 2,842,000. Were all of these flats nonstandard and subject to the surcharge? Please explain any answer that is not an unconditional affirmative.
- b. Were all of the 412,482,000 Non-Presort ZIP + 4 pieces letter-shaped? If not, please indicate the number of parcels and flats by weight increment.
- c. Under Non-Presort, the first row is identified as "Letter/Non-letters." For each ounce increment of that row shown in the attachment, please provide a breakdown showing separately the number of letters, flats and parcels.
- d. Under 3/5 Presort, the second row is identified as "Non-Auto Presort-Non-letters." For each ounce increment of that row shown in the attachment, please provide a breakdown showing separately the numbers of flats and parcels.
- e. Under 3/5 Presort, the fourth row is identified as "3/5 Digit Residual." For each ounce increment of that row shown in the attachment, please provide a breakdown showing separately the numbers of letters, flats and parcels.
- f. Under Carrier Route, the second row is identified as "non-letters." Please provide a breakdown similar to that specified in (d), above.
- g. Under Carrier Route, the third row is identified as "Residual." Please provide a breakdown similar to that specified under (e), above.

**NDMS/USPS-T32-48.**

Assume that the Postal Service wanted to study the cost of handling nonstandard pieces of First-Class Mail that weigh less than one ounce.

- a. What is the average number of IOCS tallies per 100,000,000 pieces of First-Class Mail?
- b. How many IOCS tallies would the Postal Service be likely to have for 325.6 million single pieces of nonstandard First-Class Mail described in response to NDMS/USPS-T32-29?
- c. When an IOCS tally is taken and an individual piece of First-Class Mail is being handled, does the information that is recorded about the piece of mail distinguish between standard and nonstandard pieces of First-Class Mail?
- d. In order for the IOCS to contain a sufficient number of pieces of nonstandard First-Class Mail to enable the development of an minimally reliable estimate of unit cost, how many tallies of such no standard pieces would the IOCS have to include? Please interpret "minimally reliable" as the minimum number of sample points that the Postal Service would consider acceptable for the purposes of such estimation.

**NDMS/USPS-T32-49.**

- a. Aside from IOCS data, does the Postal Service have any other source data (*e.g.*, MODS data, mail flow models, etc.) that could be used to study the cost of processing nonstandard pieces of First-Class Mail weigh less that one ounce?
- b. Unless your answer is an unqualified negative, please furnish a listing of all available data sources for conducting a study that focused on the cost of processing nonstandard pieces under one ounce.

- c. Indicate how each such data source might serve as the basis for or contribute to such a study.
- d. Assess the feasibility of conducting a study that focused on the cost of processing nonstandard pieces under one ounce from the theoretical and statistical point of view.

**NDMS/USPS-T32-50.**

Please explain your view on how weight affects the cost of handling First-Class Mail. That is, explain qualitatively the different ways that, in your view, weight can either directly or indirectly affect the cost of handling First-Class Mail.

**NDMS/USPS-T32-51.**

Please explain qualitatively how, in your view, shape affects the cost of handling First-Class Mail vis-a-vis the effect that weight has on the cost of handling it (all other factors equal, of course).

**NDMS/USPS-T32-52.**

Your response to NDMS/USPS-T32-29(d) states that “approximately 90.4 percent of Base Year 1996 single-piece nonstandard First-Class Mail is estimated to have paid the nonstandard surcharge.”

- a. What is the source of the data underlying this estimate?
- b. In what year(s) were these data collected?
- c. Please provide the raw data (*i.e.*, the numerator and the denominator) used to derive the 90.4 percent.

- d. What are the statistical confidence limits on the 90.4 percent estimate?