

DOCKET SECTION

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

RECEIVED

POSTAL RATE AND FEE CHANGES, 1997)

Docket No. R97-1 7 4 46 PM '97

NASHUA PHOTO INC., DISTRICT PHOTO INC.,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
DESIGNATION OF ORAL AND WRITTEN CROSS-EXAMINATION
OF UNITED STATES POSTAL SERVICE WITNESS MOELLER (USPS-T36)
(October 7, 1997)

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Written Cross Examination

Pursuant to Rule 4A of the Postal Rate Commission's Special Rules of Practice
(Presiding Officer's Ruling No. R97-1/4), Nashua Photo Inc. ("Nashua"), District Photo Inc.
("District"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") hereby
designate the following responses to interrogatories as their written cross-examination of Postal
Service Witness Moeller:

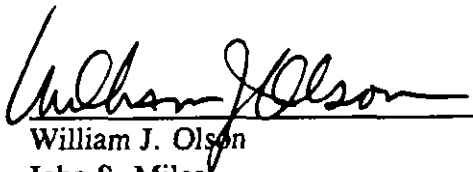
NDMS/USPS-T36-1-4
ABA&EEI&NAPM/USPS-T36-1-2
DMA/USPS-T4-23
DMA/USPS-T36-2-4, 6, 9-10
MASA/USPS-T36-4
NAA/USPS-T36-4, 6, 12
OCA/USPS-T36-8, 12-13, 15-18
PSA/USPS-T36-8
PSA/USPS-T37-2
RIAA/USPS-T28-4

Pursuant to Rule 4A, two copies of the above documents are submitted herewith to the
Secretary of the Commission.

Additionally, these intervenors request the right to designate at the hearing additional
responses to other discovery to this witness, the responses to which have not yet been received.

Oral Cross Examination

Further, pursuant to Rule 4B of the Special Rules of Practice, Nashua, District, Mystic, and Seattle hereby request permission to follow up on oral cross-examination of Witness Moeller conducted by other parties, and to conduct oral cross-examination regarding his testimony and responses to interrogatories (especially those identified above), including its written cross-examination and the following specific subjects: his testimony regarding the establishment of a residual shape surcharge; his approach to setting Standard A Mail rates; and the evidentiary basis supporting his proposed Standard A Mail rates.



William J. Olson

John S. Miles

Alan Woll

John F. Callendar, Jr.

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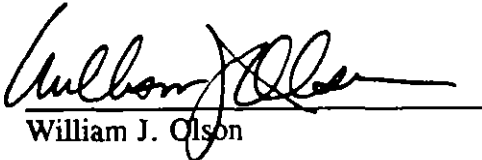
McLean, Virginia 22102-3823

(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 this document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



William J. Olson

October 7, 1997