

DOCKET SECTION

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

RECEIVED
FEB 20 3 53 PM '98
OFFICE OF THE CLERK

POSTAL RATE AND FEE CHANGES, 1997)

Docket No. R97-1

NASHUA PHOTO INC., DISTRICT PHOTO INC.,
MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC.
DESIGNATION OF WRITTEN AND ORAL CROSS-EXAMINATION
OF UNITED PARCEL SERVICE WITNESS RALPH L. LUCIANI (UPS-T-4)
(February 20, 1998)

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) and Presiding Officer's Ruling No. R97-1/90, Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc. ("NDMS") hereby designate the following responses to interrogatories as their written cross-examination of UPS witness Luciani:

NDMS/UPS-T2-1 (redirected from witness Sellick)
NDMS/UPS-T4-1

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 their and 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 Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc., request permission to conduct oral cross-examination regarding his testimony, his responses to interrogatories (especially those identified above), and Priority Mail rate design, including the proposed Priority Mail parcel surcharge and the proposed Priority Mail delivery confirmation fee.

Respectfully submitted,



William J. Olson

John S. Miles

Alan Woll

John F. Callender, Jr.

WILLIAM J. OLSON, P.C.

8180 Greensboro Drive, Suite 1070

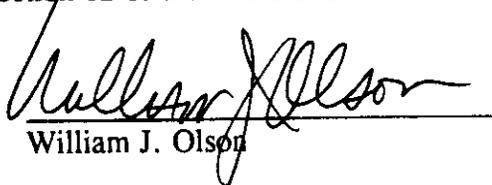
McLean, Virginia 22102-3823

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



William J. Olson

February 20, 1998