

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

Postal Rate and Fee Changes,
2006

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Docket No. R2006-1

FIRST DISCOVERY REQUESTS OF
ALLIANCE OF NONPROFIT MAILERS
TO THE GREETING CARDS ASSOCIATION
(ANM/GCA-1)
(October 4, 2006)

Pursuant to sections 25, 26 and 27 of the rules of practice, the Alliance of Nonprofit Mailers direct the following interrogatories and document requests to the Greeting Cards Association. The discovery requests, although designated as institutional, also call for information in the possession, custody or control of GCA consultants Dr. James Clifton and Professor Harry Kelejian.

If any request is deemed burdensome or seeks information that the respondent reasonably believes is confidential, please contact the undersigned counsel for ANM to discuss possible limitations or alternative requests.

If information requested is not available in the exact format or level of detail requested, please provide responsive material in such different format or level of detail as is available.

If a privilege or confidentiality is claimed for any information responsive to these requests, please describe the precise nature of any privilege claimed and describe

information being withheld, including sufficient detail to enable a reasonable assessment of the claim of privilege or confidentiality.

If any information that would have been provided in response to these requests has been destroyed, please describe such data or documents and explain the circumstances under which they were destroyed.

Respectfully submitted,

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Counsel for Alliance of Nonprofit Mailers

QUESTIONS

ANM/GCA-1. Please produce all documents (including documents stored in electronic form) containing, reflecting or relating to:

(a) Any background or preparatory information provided to Professor Harry Kelejian for his work in this proceeding.

(b) Any drafts of the testimony of GCA witness Dr. James A. Clifton in this proceeding that were furnished to Professor Kelejian before he completed his Declaration.

(c) Any communications by Professor Kelejian concerning (i) Dr. Clifton's testimony for GCA in this proceeding (GCA-T-1), or (ii) drafts of that testimony.

(d) Any drafts of Professor Kelejian's Declaration that were furnished to Dr. Clifton before he completed GCA-T-1.

(e) Any communications by Dr. Clifton concerning (i) the Declaration of Professor Kelejian filed as Appendix C to GCA-T-1, or (ii) drafts of that Declaration.

(f) Any communications by Professor Kelejian concerning (i) the prefiled testimony of USPS witness Thress (USPS-T-7) or (ii) the related interrogatory answers and oral testimony of Mr. Thress.

(g) Any communications by Professor Kelejian to assist Dr. Clifton in this proceeding.

(h) Any communications by Dr. Clifton to assist Professor Kelejian in this proceeding.

(i) Any communication between Professor Kelejian and Dr. Clifton about any matter covered in Professor Kelejian's Declaration or Dr. Clifton's testimony for GCA.