

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

---

Postal Rate and Fee Changes, 2006

---

Docket No. R2006-1

**REVISED OBJECTIONS OF THE GREETING CARD ASSOCIATION TO  
INTERROGATORIES OF DIRECT MARKETING ASSOCIATION DIRECTED TO  
WITNESS JAMES A. CLIFTON (DMA/GCA T-1-10-12)**

**(October 20, 2006)**

The Greeting Card Association ("GCA") hereby provides the revised objections to the following interrogatories of Direct Marketing Association (DMA) filed on October 4, 2006: DMA/GCA T-1-10-12. This replaces the objections filed on October 16, 2006. The revision is necessitated by the omission of proper identification of each objection as required by the Commission's Rules of Practice and Procedure § 3001.26(c). Revised objections are being filed contemporaneously herewith.

Each interrogatory is set out verbatim followed by the objection.

Respectfully submitted,

*/s/ James Horwood* \_\_\_\_\_

James Horwood  
Spiegel & McDiarmid  
1333 New Hampshire Ave. NW,  
2nd Floor  
Washington, DC 20036

Date: October 20, 2006

**DMA/GCA-T-1-10.** Please refer to your response to DMA/GCA-T1-3(b), where you state that “From the latest publicly available reliable data I have seen, a majority of the banking industry’s mail volume in First Class continues to be mailed at the full single piece rate.”

- a) Please produce the “latest publicly reliable data” to which you refer.
- b) Please explain how you verified that the data are reliable.

**OBJECTION:**

This question is a follow-up to a question that GCA objected to on grounds of relevance, burden and harassment as regards discovery on what GCA witness Clifton “believe[s]” with respect to matters that he has not opined on in his GCA testimony. GCA expressly did not waive its objections to the question or any attempt to introduce into evidence the otherwise objected-to response to DMA/GCA-T1-3(b). The Commission’s Rules permit “discovery reasonably calculated to lead to admissible evidence.” GCA witness Clifton’s testimony GCA-T1 nowhere addresses banks relative usage of First Class as opposed to Standard mail, and DMA’s inquiries into this matter are wholly irrelevant and not likely to lead to any admissible evidence.

**DMA/GCA-T-1-11.** Please refer to your response to DMA/GCA-T1-3(b), where you state that “This probably reflects the fact that banks outside of urban and suburban areas do not necessarily have access to a presort bureau and do not have enough mail volume to warrant leasing or purchasing automation machinery.

- a) Please define what you mean by the phrase “have access to a presort bureau.”
- b) What is the maximum distance between a bank and the nearest presort bureau for use of a presort bureau to be practical and cost effective.
- c) What percentage of First-Class mail entered by banks is generated within 25 miles of a presort bureau? Within 50 miles? Within 100 miles? Within any distance for which you have data?
- d) What is the maximum size of a local market needed to support a presort bureau?
- e) What percentage of First-Class mail entered by banks is generated in communities equaling or exceeding the size identified in response to part (d)?
- f) What is the minimum mail volume generated by a bank to warrant leasing or purchasing its own automation machinery?
- g) What percentage of First-Class mail entered by banks is generated by banks with a mail volume equaling or exceeding the minimum identified in response to part (f)?
- h) Please produce all data, studies and analyses that support your answers to the previous part of this interrogatory.
- i) Please produce any other data, studies and analyses indicating that banks outside of urban and suburban areas lack access to a presort bureau.

**OBJECTION:**

This question is a follow-up to a question that GCA objected to on grounds of relevance, burden and harassment as regards discovery on what GCA witness Clifton “believe[s]” with respect to matters that he has not opined on in his GCA testimony. GCA expressly did not waive its objections to the question or any attempt to introduce into evidence the otherwise objected-to response to

DMA/GCA-T1-3(b). The Commission's Rules permit "discovery reasonably calculated to lead to admissible evidence." GCA witness Clifton's testimony GCA-T1 nowhere addresses banks usage of presort bureaus, and DMA's inquiries into this matter are wholly irrelevant and not likely to lead to any admissible evidence.

**DMA/GCA-T-1-12.** Please refer to your response to DMA/GCA-T1-3(b), where you state that “Less than 6% of the bank industry’s volume of mail and cost of mail is posted at Standard A Regular Rates according to the public available reliable data I have seen.”

- a) Please produce the “publicly available reliable data” to which you refer.
- b) Please explain how you verified that the data are reliable.

**OBJECTION:**

This question is a follow-up to a question that GCA objected to on grounds of relevance, burden and harassment as regards discovery on what GCA witness Clifton “believe[s]” with respect to matters that he has not opined on in his GCA testimony. GCA expressly did not waive its objections to the question or any attempt to introduce into evidence the otherwise objected-to response to DMA/GCA-T1-3(b). The Commission’s Rules permit “discovery reasonably calculated to lead to admissible evidence.” GCA witness Clifton’s testimony GCA-T1 nowhere addresses banks relative usage of First Class as opposed to Standard mail, and DMA’s inquiries into this matter are wholly irrelevant and not likely to lead to any admissible evidence.