

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

Postal Rate and Fee Changes, 2006

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Docket No. R2006-1

**RESPONSES OF GREETING CARD ASSOCIATION
WITNESS HARRY KELEJIAN (GCA-T5) TO DISCOVERY
REQUESTS OF THE ALLIANCE OF NONPROFIT
MAILERS TO THE GREETING CARD ASSOCIATION
(ANM/GCA-1)**

(October 23, 2006)

The Greeting Card Association ("GCA") hereby provides the response of witness Kelejian (GCA-T5) to the following discovery request of the Alliance of Nonprofit Mailers filed on October 4, 2006: ANM/GCA-1. The discovery request is set out verbatim followed by the response. Although directed to GCA, GCA has redirected the discovery request to witness Kelejian consistent with ANM's request.

Respectfully submitted,

/s/ James Horwood

James Horwood
Spiegel & McDiarmid
1333 New Hampshire Ave. NW, 2nd Floor
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Date: October 23, 2006

RESPONSE OF GCA WITNESS KELEJIAN TO DOCUMENT REQUESTS OF ALLIANCE OF NONPROFIT MAILERS

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

- a. Any background or preparatory information provided to Professor 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 communications between Professor Kelejian and Dr. Clifton about any matter covered in Professor Kelejian's Declaration or Dr. Clifton's testimony for GCA.

RESPONSE:

(a) – (i). Due to the volume of the material, GCA will make available for inspection non-privileged responsive documents at the offices of its counsel, Spiegel & McDiarmid. Please contact Peter Hopkins (peter.hopkins@spiegelmc.com) (202 879-4043) to make arrangements for inspection.