

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

**Rate and Service Changes To Implement
Baseline Negotiated Service Agreement
With Life Line Screening**

Docket No. MC2007-5

**AMERICAN POSTAL WORKERS UNION, AFL-CIO, INTERROGATORIES TO
LIFE LINE SCREENING WITNESS ERIC GREENBERG
(APWU/LLS-T1-1-7)
(September 21, 2007)**

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, the American Postal Workers Union, AFL-CIO (APWU) directs the following interrogatories to Life Line Screening witness Eric Greenberg. If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

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APWU/LLS-T1-1 On page 7 of your testimony you state that “[v]ery little growth in screening events is expected to take place in 2008 and beyond because we will already have teams in all 48 continental US states.”

- a) Since your teams screen only within a 2-3 hour radius of their “home” base, doesn’t this leave a relatively large part of the country for potential expansion?
- b) What sort of demographic and population density characteristics are you seeking to serve?
- c) Are you planning on adding any new screening teams during the proposed period of this NSA?

APWU/LLS-T1-2 You discuss the possible use of e-mail to replace direct mail.

- a) How do you obtain e-mail addresses for your marketing?
- b) Is this primarily used to communicate with people who have already been to one of your screenings or with potential new customers?
- c) What percentage of the people that you provide screenings to give you their e-mail address?

APWU/LLS-T1-3 Does Life Line use repositionable notes on all of its solicitation letters or only on some of them? Does it plan on using repositionable notes on the expanded mailings it will do if this NSA is approved?

APWU/LLS-T1-4 What sort of price increases have you experienced for your web, e-mail, radio, newspaper inserts and television advertising in the past two years?

APWU/LLS-T1-5 You mention that Life Line has been doing screenings since 1996 but that it only began using direct mail in 2003. What was your primary method of gaining new customers prior to 2003?

APWU/LLS-T1-6 What percentage of your screenings is for people who have never been screened by you before and what percentage is for repeat customers? How frequently should a person have a Life Line screening?

APWU/LLS-T1-7 Have you seen any changes in the response rate to e-mail over the past few years as spam blockers have become more prevalent?