

**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

**RESPONSES OF WITNESS GREENBERG TO INTERROGATORIES OF THE
OFFICE OF THE CONSUMER ADVOCATE (OCA/LLS-T1-1, 2, 3, 4, 4(b), 5(a),
5(b), 7, 8, 8(a), 8(b), 9(c), 9(e), 10, 11(a), 11(b), 11(c), 11(e), 11(g), and 11(k))**

(September 26, 2007)

Life Line Screening hereby presents the responses of witness Greenberg to the following interrogatories of the Office of the Consumer Advocate, filed August 27, 2007: OCA/LLS-T1-1, 2, 3, 4, 4(b), 5(a), 5(b), 7, 8, 8(a), 8(b), 9(c), 9(e), 10, 11(a), 11(b), 11(c), 11(e), 11(g), and 11(k). As indicated in these responses, answers to several questions will be filed under seal pursuant to the Commission's Order No. 36.

Additionally, Life Line Screening objects to a number of these questions as not reasonably calculated to lead to the discovery of admissible evidence. Questions relating to the number of Life Line employees, number of ultrasound teams, demographics of Life Line customers, relationships with business partners, and plans for the growth of Life Line's business are irrelevant to issues of Life Line's current and future mail volumes. Life Line may grow as a business in ways that have no impact on its mail volumes. Without waiving these objections, and in the interests of disclosure and the amicable

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resolution of these proceedings, Life Line has nevertheless provided responses to most of these questions.

Respectfully submitted,

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OCA/LLS-T1-1. Please confirm that the full name of your employer is Life Line Screening of America Ltd, registered in Ohio as a limited liability company. If you do not confirm, please explain any and all differences between “Life Line Screening of America” and “Life Line Screening of America Ltd”.

Response:

Confirmed.

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OCA/LLS-T1-2. Please confirm that Life Line Screening of America Ltd has never made a filing with the SEC. If you do not confirm, please provide a copy of the most recent SEC filing.

Response:

Confirmed.

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OCA/LLS-T1-3. At page 3, lines 12-17, of your testimony, you discuss the effect of adding an ultrasound team to Washington, DC. Is Life Line Screening of America Ltd currently registered to do business in the District of Columbia? If not, state the calendar year in which Life Line Screening of America Ltd expects to commence doing business in the District of Columbia.

Response:

Yes.

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OCA/LLS-T1-4. Please define and give examples of “affinity partners” as that term is used at page 8, line 15, of your testimony.

- a. Is Memorial Hermann System of Houston, Texas, an affinity partner? (“Memorial Hermann System and Life Line Screening Partner to Promote Healthier Communities in Houston Area” <http://www.memorialhermann.org/newsroom/060807.htm>) If not, please describe the relationship between Life Line Screening of America Ltd and Memorial Hermann System.
- b. Is Life Line Screening, as used in the quotation above, the same entity as Life Line Screening of America Ltd? If not, please explain any and all differences between “Life Line Screening” and “Life Line Screening of America Ltd”.
- c. Has the relationship with Memorial Hermann System caused an increase in Life Line Screening of America Ltd’s volume of letter-shaped Standard Mail? If so, by how much. If not, why not?

Response:

An “affinity partner” is someone that partners with Life Line to offer screenings to their customers or members. Example would be associations of realtors, engineers, or other professionals.

- a. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.
- b. Yes.
- c. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.

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OCA/LLS-T1-5. During calendar year 2007, how many affinity partners has Life Line Screening of America Ltd acquired?

- a. How has the acquisition of affinity partners during calendar year 2007 affected Life Line Screening of America Ltd's volume of letter-shaped Standard Mail?
- b. Please confirm that the website of Life Line Screening of America Ltd makes the following statement: "These partnerships demonstrate the credibility of our organization and provide us the access to *market our services in a much broader arena.*" <http://www.lifelinescreening.com/Partnerships/Pages/Index.aspx> (emphasis added).
- c. Please confirm that Life Line Screening of America Ltd will not seek affinity partners or other partnerships during the period of calendar years 2008-2010. If you do not confirm, please explain.

Response:

Life Line will provide a response to the first sentence of this request under seal pursuant to the Commission's Order No. 36.

a. The more affinity partners that Life Line has that want Life Line to mail to their customers or members, the more mail Life Line will send. We do not have specific figures related to the relationship between affinity partners and mail volumes.

b. Confirmed.

c. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.

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OCA/LLS-T1-6. During the effective period of the NSA, how many affinity partners does Life Line Screening of America Ltd expect to acquire? How will the acquisition of affinity partners during the effective period of the NSA affect Life Line Screening of America Ltd's volume of letter-shaped Standard Mail?

Response:

Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.

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OCA/LLS-T1-7. Please define and give examples of “major US market,” as that term is used at page 6, lines 18-19, of your testimony.

- a. What was the last major US market that Life Line Screening of America Ltd entered?
- b. On what date did Life Line Screening of America Ltd commence operations in that major US market?
- c. How many major US markets are there?

Response:

Life Line has no standard or technical definition of “major US market.” Life Line covers all 48 continental U.S. states with the exception of Kentucky and Arizona, which are run by franchises. We believe our screenings cover all geographical areas with sufficient population to warrant our attendance there.

- a. The most recent market Life Line entered was Des Moines, Iowa.
- b. Second Quarter of 2007.
- c. Life Line does not possess this information, and the question is unanswerable as “major US market” is not a technical term.

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OCA/LLS-T1-8. Please define and describe “ultrasound team,” as that term is used at page 2, line 7, page 3, line 7, and page 6, line 17, of your testimony.

- a. As of December 31, 2006, how many ultrasound teams existed?
- b. As of August 31, 2007, how many ultrasound teams existed?
- c. Are all members of ultrasound teams employees of Life Line Screening of America Ltd?
- d. As of December 31, 2006, what was the total number of all employees of Life Line Screening of America Ltd?
- e. As of August 31, 2007, what was the total number of all employees of Life Line Screening of America Ltd?
- f. Have the employees of Line Screening of America Ltd been informed that the company will not grow during the period of calendar years 2008-2010? If not, why not?

Response:

An “ultrasound team” is a team of 4-6 ultrasound and medical technicians that performs Life Line’s health screenings.

- a. 84
- b. 86
- c. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.
- d. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.
- e. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.
- f. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.

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OCA/LLS-T1-9. At page 7, lines 6-8, of your testimony, you state,

Very little growth in screening events is expected to take place in 2008 and beyond because we will already have teams in all 48 continental states. . . . Thus, in the absence of this NSA, significant direct mail volume growth is not anticipated, as the number of our screening events each year are not expected to increase substantially.

- a. Please list the states in which there is only one ultrasound team.
- b. How many ultra sound teams are in Arizona?
- c. Please confirm that four of the top thirty-five fastest growing US cities are in Arizona.
(http://money.cnn.com/2007/06/27/real_estate/258_fastest_growing_cities/index.htm) If you do not confirm, please explain.
- d. How many ultrasound teams are in Texas?
- e. Please confirm that nine of the top thirty-five fastest growing US cities are in Texas.
(http://money.cnn.com/2007/06/27/real_estate/258_fastest_growing_cities/index.htm). If you do not confirm, please explain.
- f. Please list the consolidated metropolitan statistical areas (CMSAs as defined by the US Census Bureau) in which there is more than one ultrasound team.
- g. Please list the CMSAs in which a new ultrasound team will be placed during calendar years 2008-2010.

Response:

- a. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- b. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- c. This information that is readily available to the OCA with a reasonable expenditure of effort.
- d. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.

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- e. This information that is readily available to the OCA with a reasonable expenditure of effort.
- f. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- g. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.

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OCA/LLS-T1-10. Please confirm that Polaris Venture Partners holds an interest in Life Line Screening of America Ltd (<http://www.polarisventures.com/Portfolio/CompanyDetail.asp?CompanyID={4A39D7FD-7FB9-427D-99A6-586B0C7ABC69}>). If you do not confirm, please explain the appearance of Life Line Screening of America Ltd on the Polaris website.

- a. Please confirm that the Polaris website states, “We invest in seed, early stage, and high growth middle market companies.” (<http://www.polarisventures.com/WhoWeAre/MissionStrategy.asp>)
- b. At page 3, lines 19-20, of your testimony, you state, “[W]e have territorial coverage in all the places we need to be in.” Please confirm that Life Line Screening of America Ltd will not be a high-growth company in the period 2008-2010. If you do not confirm, please explain.
- c. Please explain why Polaris would retain a stake in a company that expects flat growth over the next three years.

Response:

Confirmed.

- a. Confirmed.
- b. Not confirmed. Territorial coverage in the United States is not the only growth factor.
- c. Life Line cannot speak to Polaris’s investment decisions.

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OCA/LLS-T1-11. At page 2, line 23, through page 3, line 1, of your testimony, you state, “Our customers are typically aging baby boomers and senior citizens.”

- a. At what age does one become an aging baby boomer?
- b. Is a retiree likely to be an aging baby boomer or senior citizen?
- c. How many people over the age of 60 live in Florida?
- d. How many ultrasound teams are in Florida?
- e. How many people over the age of 60 live in the New York City CMSA?
- f. How many ultrasound teams are in the New York City CMSA?
- g. How many people over the age of 60 live in Texas?
- h. How many ultrasound teams are in Texas?
- i. What state has the highest ratio of people over the age of 60 to ultrasound teams?
- j. What state has the lowest ratio of people over the age of 60 to ultrasound teams?
- k. Please explain why the difference in these ratios does not signal growth opportunities for Life Line Screening of America Ltd.

Response:

a. Life Line objects to this request as not reasonably calculated to lead to the discovery of admissible evidence.

b. Life Line objects to this request as not reasonably calculated to lead to the discovery of admissible evidence.

c. This information is readily available to the OCA from publicly available sources with a reasonable expenditure of effort.

d. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.

e. This information is readily available to the OCA from publicly available sources with a reasonable expenditure of effort.

f. Life Line will provide a response to this request under seal pursuant to the Commission’s Order No. 36.

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- g. This information is readily available to the OCA from publicly available sources with a reasonable expenditure of effort.
- h. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- i. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- j. Life Line will provide a response to this request under seal pursuant to the Commission's Order No. 36.
- k. The number of people over 60 is not the only relevant factor determining Life Line's growth opportunities in a given area.