

**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

**RESPONSE OF WITNESS GREENBERG
TO INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION,
AFL-CIO (APWU/LLS-T1-5)**

(October 5, 2007)

Life Line Screening (“Life Line”) hereby presents the response of witness Greenberg to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed September 21, 2007: APWU/LLS-T1-5. As indicated in these responses, Life Line has filed a motion for a protective order governing the responses to APWU/LLS T1-1-4, 6, and 7, and will file those responses once the Commission has acted on that motion.

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 demographics of Life Line target markets, relationships with business partners, frequency of screenings, 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, and the frequency at which people

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should undergo screenings is not a factor driving mail volume. Without waiving these objections, and in the interests of disclosure and the amicable resolution of these proceedings, Life Line has nevertheless provided responses to these questions.

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Matthew D. Field
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to Life Line Screening

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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 eventual 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?

Response:

- a) A motion for protective conditions has been filed.
- b) A motion for protective conditions has been filed.
- c) A motion for protective conditions has been filed.

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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?

Response:

- a) A motion for protective conditions has been filed.
- b) A motion for protective conditions has been filed.
- c) A motion for protective conditions has been filed.

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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?

Response: A motion for protective conditions has been filed.

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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?

Response: A motion for protective conditions has been filed.

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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?

Response: Newspaper inserts, public relations, field sales force, and radio.

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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?

Response: A motion for protective conditions has been filed.

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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?

Response: A motion for protective conditions has been filed.