

**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
AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/LLS-T1-1-4, 6, and 7)**

(October 12, 2007)

Life Line Screening (“Life Line”) hereby presents the responses of witness Greenberg to the following interrogatories of the American Postal Workers Union, AFL-CIO, filed September 21, 2007: APWU/LLS-T1-1-4, 6, and 7.

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

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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) No. Life Line covers all U.S. territory that Life Line has determined to be economically attractive to operate in. In some cases we have “seasonal” van teams that actually travel across several states for a few months at a time so that we can reach less populated states such as Wyoming and the Dakotas. Each screening event also pulls from a geographic radius of population around the event that people are willing to travel to. In some instances, Life Line visits a given zip code only once a year; in others Life Line visits it multiple times in a 12 month period.

b) A variety of characteristics are important, not the least of which is our historical ability to draw enough customers through our existing marketing channels to cover the fixed costs of operating a screening event in a given location on a given day. Customer counts are affected by age, income, education, gender, propensity to respond do different marketing channels, our ability to target likely prospects, and several other factors.

c) Life Line has no plans for new U.S. ultrasound teams at this time.

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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) Customers provide them to us, or affinity partners will send them out on our behalf to prospects.
- b) Life Line uses e-mail communication for both purposes.
- c) Historically, we have averaged between 50-60%.

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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: Only some of Life Line's solicitation mail uses RPNs. Some of the additional mail resulting from the NSA will likely use RPNs. Life Line Screening's use of RPNs is completely tied to its profitability and effectiveness as a marketing tool.

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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: Newspaper inserts have had no price increases to speak of over the last 3-4 years. Our media costs per unit in email and radio have declined as we have increased our scale of advertising. Our experience with television is not extensive enough to answer this question.

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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: We don't have separate screening events for previous customers versus first time customers. They all come to the same event. The frequency of screening has nothing to do with Life Line's marketing and promotional programs and varies depending on a number of factors including an individual's age, risk factors, and medical history.

RESPONSES OF LIFE LINE WITNESS GREENBERG TO INTERROGATORIES OF
THE AMERICAN POSTAL WORKERS UNION

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: We have only started using email heavily in the last 12-18 months, and only within the last 3-6 months have we begun using tools that indicate delivery and openability information. We do not have enough data to have a perspective on how spam blocker usage has changed over time.