

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DISCOVERY REQUEST OF GAMEFLY INC.

GFL/USPS-63. This question refers to Paragraph 132 of the parties' July 20, 2009, Joint Statement of Undisputed and Disputed Facts. Paragraph 132 contains the following undisputed statement of fact: "GameFly asks in this proceeding that the Commission order the Postal Service to offer GameFly's DVD mailers processing on terms and conditions substantially identical to those offered to Netflix." If GameFly were to begin entering its DVDs in lightweight mailers like those of Netflix, at the rates of postage charged for one-ounce machinable letters, would the Postal Service offer to GameFly the same degree of manual culling and priority manual processing that the Postal Service currently provides to Netflix?

RESPONSE:

As with Netflix, the Postal Service would allow field officials to determine whether to manually cull GameFly's return mail, based on the discretion of field operations management to carry out what they consider the most efficient processes for GameFly return mail. This decision-making would determine the degree to which GameFly return mail is manually culled.