

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

COMPLAINT OF GAMEFLY, INC.)
)
) Docket No. C2009-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DISCOVERY REQUESTS OF GAMEFLY, INC.
(GFL/USPS-86-89, 96)
(October 2, 2009)

Pursuant to Rules 26 and 27 of the Commission's Rules of Practice and Procedure, the Postal Service hereby provides responses to the following discovery requests of GameFly, Inc.: GFL/USPS-86-89, 96.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
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RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DISCOVERY REQUEST OF GAMEFLY, INC.

GFL/USPS-86. Please confirm that, while USPS Headquarters has specifically instructed field personnel to process Netflix on automated letter processing equipment, Headquarters has not done so for inbound mailpieces.

RESPONSE:

Confirmed that Postal Service Headquarters has instructed field personnel to process outbound Netflix mail on automated letter processing equipment, but not return Netflix mail.

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

GFL/USPS-87. Please identify the individuals or groups at Postal Service Headquarters responsible for the decision to instruct field personnel how to process outbound Netflix mailpieces.

RESPONSE:

The memo with respect to outbound processing was signed by the then-Senior Vice President, Operations.

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

GFL/USPS-88. Please identify the individuals or groups responsible for the decision to leave the method of processing inbound Netflix mailpieces to the discretion of field personnel.

RESPONSE:

Senior management of the Postal Service.

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

GFL/USPS-89. Please provide the instructions issued by Postal Service headquarters to field personnel regarding the processing of Netflix *outbound* mailpieces.

RESPONSE:

See the memorandum that begins at GFL0000517.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
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GFL/USPS-96. Please refer to the response to GFL/USPS-19(b)-(c) where it states:

With respect to Blockbuster, relatively recent changes to the postage payment method for Blockbuster should have increased the percentage of Blockbuster mail (that is returned through the letters mailstream rather than to Blockbuster stores) being run on automation relative to manually, though no specific percentage is available.

Please confirm that the change in Blockbuster's postage payment method, which may have increased the percentage of pieces processed on automation, was made voluntarily by Blockbuster. If not confirmed, please explain fully.

RESPONSE:

Confirmed.