

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-106(e)-(f), 189)
(November 4, 2009)

Pursuant to Rules 26 and 27 of the Commission's Rules of Practice and
Procedure, the Postal Service hereby provides its responses to the following
discovery requests of GameFly, Inc.: GFL/USPS-106(e)-(f), 189.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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GFL/USPS-106. Please refer to "Pacific Area DVD SOP.pdf" (Bates number GFL0000527-34) and Eastern Area SOP# 05-05-4 (Bates number GFL0000535-42).

(e) What percentage of mail volume destinatees in the Pacific and Eastern Areas?

(f) What percentage of Netflix mail volume destinatees in the Pacific and Eastern Areas?

RESPONSE:

(e) The percentage of mail volume destinating in the Pacific Area was 12.57 percent in FY2009 and 12.76 percent in FY 2008. The percentage of mail volume destinating in the Eastern Area was 12.28 percent in FY2009 and 12.21 percent in FY2008.

(f) The Postal Service has no data that would provide percentages of Netflix volume destinating in the Pacific and Eastern Areas.

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GFL/USPS-189. This question refers to your responses to GFL/USPS-67.

(a) The last three sentences of your response to GFL/USPS-67(a) discuss alternative meanings of “manual processing.” Is there any widely used meaning of the phrase known to the Postal Service that would change the first word of your answer to the question? If so, explain fully.

(b) Please confirm that your answer to GFL/USPS-67(b) means that the Postal Service disagrees with the premise of the question. If you fail to confirm without qualification, please explain fully why you disagree with GFL/USPS-67(b).

RESPONSE:

(a) No.

(b) Confirmed.