

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

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

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DISCOVERY REQUEST OF GAMEFLY, INC.
(GFL/USPS-8)
(December 11, 2009)

Pursuant to Rules 26 and 27 of the Commission's Rules of Practice and Procedure, the Postal Service hereby provides its Response to the following discovery request of GameFly, Inc.: GFL/USPS-8, filed on July 31, 2009. The Postal Service filed its objections to GFL/USPS-8 on August 10, 2009, and Gamefly, Inc. filed a motion to compel on August 24, 2009. The Commission granted Gamefly, Inc.'s motion to compel, while narrowing its scope, on September 28, 2009. Accordingly, this response is 67 days late.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product
Support

Kenneth N. Hollies
James M. Mecone
Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-3083
(202) 268-3083, Fax -3084

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

GFL/USPS-8. Produce all documents from USPS Headquarters relating to communications between the Postal Service and Netflix concerning the establishment of Permit Reply Mail (PRM) since January 1, 2005 through the implementation of PRM.

RESPONSE:

The document entitled, "PRM" (Bates number GFL0000848) is responsive to Interrogatory No. 8. The Postal Service has identified no additional documents responsive to Interrogatory No. 8. As its obligation is continuing, the Postal Services will supplement this Response if it discovers additional documents responsive to Interrogatory No. 8.