

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-99-100, GFL/USPS-129(a)-(b))
(February 8, 2010)

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 interrogatories from GameFly, Inc.: GFL/USPS-99-100 and GFL/USPS-129(a)-(b), filed on September 18, 2009. GameFly, Inc. filed a motion to compel on October 13, 2009. The Presiding Officer granted GameFly's motion to compel, while narrowing its scope, on November 4, 2009. Accordingly, the responses are 89 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 INTERROGATORY OF GAMEFLY, INC.

GFL/USPS-99. Please confirm the following statements. Explain fully any failure to confirm:

- (a) The Postal Service Intranet (“blue”) website includes a page of contact information for Business Mail Acceptance (“BMA”) managers.
- (b) The listing identifies the subject matter responsibilities of each BMA manager.
- (c) One manager is identified as having responsibility for “Netflix.”
- (d) The manager identified as having responsibility for “Netflix” is Michael Ohora.
- (e) The listings of BMA managers identify no other individual Postal Service customer as the responsibility of any BMA manager.

RESPONSE:

The intranet page to which this interrogatory refers serves as an internal resource so that postal employees can quickly reach the correct staff person within a functional area who is responsible for handling inquiries that routinely recur.

- (a) Confirmed that this “Blue” page identifies the Manager of Business Mail Acceptance (BMA) and his direct reports, together with the managers of Mailer Enterprise Integration and Business Mailer Support and their respective staff members.
- (b-c) Confirmed that some responsibilities for each BMA staff person are listed, and that one such person has Netflix so listed.
- (d) Not Confirmed. Michael Ohora is not the BMA Manager.
- (e) Confirmed that no other mailers are identified on this web page.

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GFL/USPS-100. Please explain why the Postal Service assigns an individual Business Mail Acceptance (“BMA”) manager to Netflix, but to no other customer of the Postal Service.

RESPONSE:

As reflected in the response to GFL/USPS-99, the Postal Service does not assign an individual BMA Manager to Netflix or any other Postal Service customer. The Postal Service assigns other individual employees, but not BMA Managers, to Postal Service customers, including GameFly and Netflix.

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GFL/USPS-129. [REDACTED]

RESPONSE:

(a) [REDACTED]

(b) [REDACTED]