

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

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

**SECOND DISCOVERY REQUESTS OF GAMEFLY, INC.,  
TO THE UNITED STATES POSTAL SERVICE WITNESS  
LARRY J. BELAIR  
(GFL/USPS-T2-21-28)**

Pursuant to Rules 25 through 27 of the Rules of Practice and Procedure of the Postal Regulatory Commission, GameFly, Inc., respectfully submits these discovery requests to USPS witness Larry J. Belair.

Respectfully submitted,

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August 16, 2010

## **INSTRUCTIONS AND DEFINITIONS**

1. GameFly incorporates by references the instructions and definitions set forth in its first discovery requests to the Postal Service, dated July 31, 2009.
2. These questions are directed to both the witness and the Postal Service, and call for all responsive information in the possession, custody or control of either the witness or the Postal Service.
3. If particular documents responsive to a request have already been produced to or by GameFly, it is sufficient to identify those documents by title and date (for pleadings) or by GFL Bates number (for documents produced by the Postal Service in discovery).

## **QUESTIONS**

**GFL/USPS-T2-21.** Please produce all studies, reports, analyses, guidelines, handbooks, SOPs and similar documents (whether or not they have been produced to you until now) concerning the methods of handling DVD mailers at the Fort Lauderdale plant referenced in USPS-T-2 at 20-22.

**GFL/USPS-T2-22.** In USPS-T-2 at 21-22, you summarize one or more conversations with other individuals in Fort Lauderdale.

(a) For each such conversation, please identify the individuals who participated in or heard it, the date, the location(s) of the participants, and the substance of the conversation.

(b) For a each such conversation, please produce all notes of the conversation, whether written or electronic.

**GFL/USPS-T2-23.** Please produce all written communications, and provide a detailed description of all oral communications, between you and anyone else at the Postal Service concerning the methods of handling DVD mailers at the Fort Lauderdale plant referenced in USPS-T-2 at 20-22.

**GFL/USPS-T2-24.** Please produce all written communications, and provide a detailed description of all oral communications, between you and anyone else at the Postal Service concerning the selection of the Fort Lauderdale plant as the sole plant to discuss in USPS-T-2 at 20-22.

**GFL/USPS-T2-25.** Prior to the submission of your testimony, did the Postal Service consider reporting on DVD mail processing at any plant other than the Fort Lauderdale plant? If so, please:

(a) Identify the other facility or facilities that were considered.

(b) Please produce all written documents relating to, reflecting or arising from the Postal Service's consideration of the other facility or facilities for coverage in your testimony.

(c) Provide a detailed description of all oral communications between you and anyone else at the Postal Service relating to, reflecting or arising from the Postal Service's consideration of the other facility or facilities for coverage in your testimony.

(d) Please produce all studies, reports, analyses, guidelines, handbooks, SOPs and similar documents (whether or not they have been produced to you until now) concerning the methods of handling DVD mailers at the facilities identified in response to part (a).

**GFL/USPS-T2-26.** Please produce a schematic diagram of the “extended culling belt” and other equipment described on page 21 of USPS-T-2, the facility where the equipment is located, and the other mail processing located within 100 feet of the “extended culling belt.” The diagram should have sufficient detail, and sufficiently accurate scale, to reveal the relative size and positioning of the “extended culling belt” and associated equipment with the other equipment and the facilities housing them.

**GFL/USPS-T2-27.** Please explain why physical or economic factors have prevented other postal facilities from adopting the Fort Lauderdale method of processing DVD mailers. Produce documents sufficient to verify your response.

**GFL/USPS-T2-28.** Please produce all data, studies, analyses, reports and similar documents concerning the performance and effectiveness of the processes in the Fort Lauderdale plant described on pages 21-22 of USPS-T-2.