

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

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

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS LARRY J.  
BELAIR TO SECOND DISCOVERY REQUESTS OF GAMEFLY, INC.  
(GFL/USPS-T2-21 and 26-28)  
(August 30, 2010)**

Pursuant to Rules 26 and 27 of the Commission's Rules of Practice and Procedure, Postal Service witness Larry J. Belair provides his responses to the following interrogatories from GameFly, Inc.: GFL/USPS-T2-21 and 26-28, filed on August 16, 2010.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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August 30, 2010

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LARRY J.  
BELAIR TO SECOND DISCOVERY REQUESTS OF GAMEFLY, INC.

**GFL/USPS-T2-21.** Please produce all studies, reports, analyses, guidelines, handbooks, SOPs and similar documents (whether or not the [sic] 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.

**RESPONSE:**

Please see Appendix-GFL/USPS-T2-21. The standard operating procedure's instructions for handling Netflix and Blockbuster DVDs apply to all DVD round trip mail; language suggestive of limitations to specific DVD mailers, and letters only, are words of description rather than limitation. GameFly mail is handled in conformity with the instructions.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LARRY J.  
BELAIR TO SECOND DISCOVERY REQUESTS OF GAMEFLY, INC.

**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.

**RESPONSE:**

Please see Appendix-GFL/USPS-T2-26.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LARRY J. BELAIR TO SECOND DISCOVERY REQUESTS OF GAMEFLY, INC.

**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.

**RESPONSE:**

According to Fort Lauderdale P&DC Management, adding the extended culling belt in Fort Lauderdale was a pilot project implemented with no capital costs and less than two hours of labor costs. The project was initiated by local maintenance personnel in an attempt to achieve better performance on downstream automation equipment by manually removing non-automation compatible mail from the mail stream.

Each Postal Service mail processing facility is unique in size, shape, layout, column spacing, and physical structure. A unique cost would be incurred if another facility adopted the Fort Lauderdale process. I understand that the Postal Service has no documents addressing the efficiency impact of the Fort Lauderdale disc processing method.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS LARRY J.  
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**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.

**RESPONSE:**

As previously stated, I understand that the Postal Service generated no data, studies, analyses or reports concerning the performance and effectiveness of the Fort Lauderdale process.

# **APPENDIX-GFL/USPS-T2-21**

# **SOUTH FLORIDA DISTRICT**

## **MAIL PREPARATION GUIDE**

June 2008

Version 08.2

**NOTE – CHANGES HAVE BEEN MADE TO THE FOLLOWING SECTIONS:**

**EMPTY EQUIPMENT – PAGE 4, ITEM 6 (ADDED)**

**NETFLIX, BLOCKBUSTER DVD's – PAGE 8 (ADDED)**

**METERED LETTERS & FLATS PLACARD COLOR – PAGES 5, 6, (CHANGE)**

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## **NETFLIX and BLOCKBUSTER DVD's**

1. NetFlix and Blockbuster DVD's collected must be separated, faced and placed in a letter tray. An EMM letter tray is preferable.
2. The Netflix/Blockbuster trays should be placed in the Blue Box Collection Mail container on top of the Blue Box collection mail.

Ensure the **Blue Box Collection Mail 010** placard is used.

**This placard is to be WHITE in color.**

## **PRIORITY MAIL**

Except for Overnight Priority Mail, all other Priority Mail is separated according to shape, using one of the three categories, or the "3" holdout.

### **Overnight Priority**

1. **Priority Mail Outsides and Parcels for 330, 331, 332, 333, 334 and 349 are to be placed into a separate MTE containers from the other Priority mail.**
2. **Priority Flats are to be placed into separate flat tubs for 330, 331-332, 333 and 334 & 349 and placed on top of Overnight Priority MTE containers. Overnight Priority Mail must not be mixed with other Priority Mail or placed in other mail type MTE.**
3. Mail in this container is dock transferred and goes directly to the L&DC Processing Center in Miami.

**The OVERNIGHT PRIORITY placard is to be utilized for the outside of the MTE container.**

**The individual 330, 331-332, 333 and 334 & 349 placards are to be utilized for the flat tubs inside the MTE container.**

**These placards are ALL to be LIME GREEN in color.**

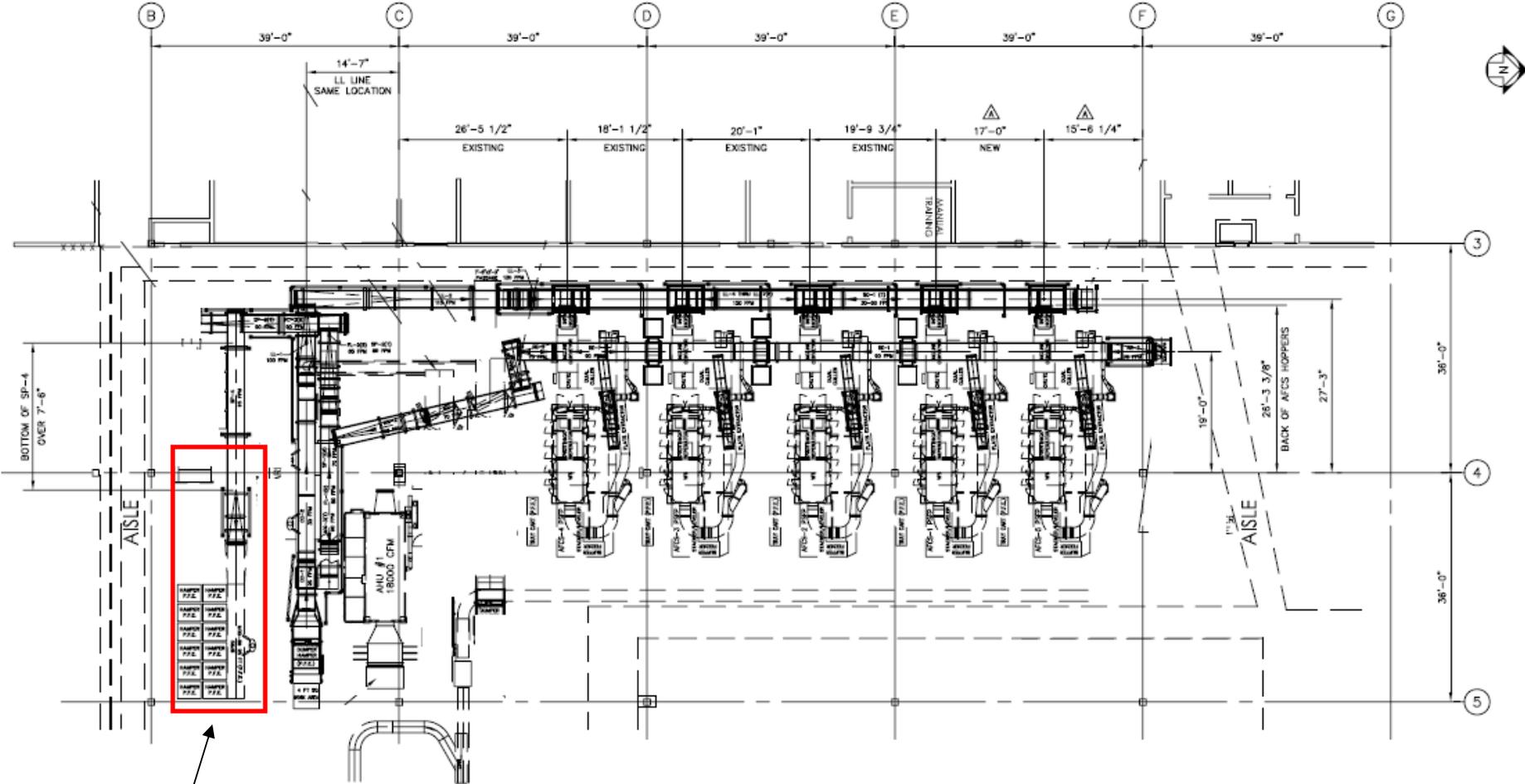
### **Priority Mail – Flats**

1. All non-Overnight Priority Mail Flats and Delivery Confirmation pieces are to be placed in flat tubs.
2. When placed in flat tubs, Priority Flats should be faced.

Ensure the **Priority Mail – Flats** placard is used.

# **APPENDIX-GFL/USPS-T2-26**

# Fort Lauderdale P&DC Loose Mail Distribution System (LMDS)



Extended Culling Belt