

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 ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.
(GFL/USPS-T4-44-49)
(September 29, 2010)**

Pursuant to Rules 26 and 27 of the Commission's Rules of Practice and Procedure, Postal Service witness Robert Lundahl provides his responses to the following discovery requests from GameFly, Inc.: GFL/USPS-T4-44 - 49, filed on September 14, 2010.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:
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September 29, 2010

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-44. Please confirm that the documents produced by the Postal Service on August 31 in ATR 1 – ATR 10, along with the document previously produced by the Postal Service and Bates numbered at GFL7178 et seq., constitute all of the studies, analyses, and reports that ATR performed under contract to Netflix regarding disc breakage and breakage mitigation efforts. If any other responsive studies, analyses, reports or other documents have not yet been produced to GameFly, please produce them.

RESPONSE:

Confirmed.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-45. This question refers to the document produced by the Postal Service on or about August 31, 2010, and Bates numbered by the Postal Service as USPS091816.

(a) Please provide a detailed description of the test that yielded the results shown on the cited page.

(b) Please confirm that the results shown on the cited page were the final results of this test. If not confirmed, please provide an update to the tables presented on this page.

(c) Please define the following terms as used on this page: **[BEGIN NETFLIX PROPRIETARY]**

RESPONSE:

(a) **[REDACTED]**

(b) **[REDACTED]**

(c) **[REDACTED]**

(d) **[REDACTED]**

(e) **[REDACTED]**

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-46. [REDACTED]

RESPONSE:

[REDACTED]

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-47. [REDACTED]

RESPONSE:

[REDACTED]

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-48. [REDACTED]

RESPONSE:

[REDACTED]

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS ROBERT
LUNDAHL TO DISCOVERY REQUESTS OF GAMEFLY, INC.

GFL/USPS-T4-49. [REDACTED]

RESPONSE:

[REDACTED]