

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

VALASSIS NSA

Docket No. MC2012-14

Docket No. R2012-8

APPLICATION OF GATEHOUSE MEDIA, INC. FOR NON-PUBLIC TREATMENT

Pursuant to 39 CFR §§ 3007.10 and 3007.22, GateHouse Media, Inc. ("GateHouse") hereby requests relief from public disclosure for the submission accompanying this application, namely the "Response of GateHouse Media, Inc. to Notice of Inquiry No. 1", Before the Postal Regulatory Commission, Valassis NSA, Docket No. R 2012-8 (the "Materials"). The Materials include commercially sensitive non-public GateHouse revenue and operating information – specifically GateHouse revenue from advertising inserts and GateHouse volumes of TMC products and related postage costs. As this Material is non-public and similar information of our competitors is non-public and not available to GateHouse, public disclosure and availability of this information will give GateHouse competitors and unfair competitive advantage, potentially allowing them to undercut GateHouse pricing in certain markets and cause GateHouse potential loss of business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 27, 2012

GateHouse Media, Inc.

By: 

Name: Brad Harmon

Title: Vice President of Sales & Marketing

BEFORE THE
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RESPONSE OF GATEHOUSE MEDIA, INC. TO NOTICE OF INQUIRY NO. 1

GateHouse Media, Inc. is the publicly traded holding company for the entities that operate the publications listed on Exhibit A. While we understand and respect competitors attempting to grow their business creatively, we believe this approach is not in fair or equitable competition and would constitute an unfair competitive advantage. We believe a level playing field is important and that every competitor gets the same treatment to determine who can and will deliver the best ROI for their clients. By giving Valassis with an unfair advantage over our industry is ludicrous and should be denied on all levels. This move would significantly/negatively impact the hundreds of local communities we serve every day. We are the pre-eminent source of local news and information in the markets we serve. It would potentially force us to reduce some local content that would impact how our readers are informed about their community at large and they would have no other (or few) sources to choose from in their market.

Response To Questions

1. For fiscal year 2010, we estimate that advertising inserts for durable and semi-durable goods from national retailers represented [REDACTED] of total advertising revenues (including ROP, classified, and digital advertising), [REDACTED] of total print advertising revenue, and [REDACTED] of total preprint advertising revenue.

2. For fiscal year 2011, we estimate that advertising inserts for durable and semi-durable goods from national retailers represented [REDACTED] of total advertising revenues (including ROP, classified, and digital advertising), [REDACTED] of total print advertising revenue, and [REDACTED] of total preprint advertising revenue.

3. GateHouse newspapers distribute Total Market Coverage products to non-subscribers. These TMC packages are distributed mid-week and contain advertising inserts from grocery stores, cable companies, fast food, etc. While TMCs may contain ad inserts from national retailers of durable and semi-durable goods, most of these types of ad inserts are distributed in our newspapers' weekend/Sunday editions and are an important source of revenue for newspaper journalism in our communities.

.....For fiscal year 2011, we estimate that we mailed [REDACTED] [REDACTED] TMC advertising mail packages/shoppers displaying durable and semi-durable goods from national retailers via the Postal Service. We do not keep records of TMC packages and inserts by weight.

4. For fiscal year 2010, we estimate that we mailed approximately [REDACTED] [REDACTED] pieces of TMC advertising mail packages for which we paid the Postal Service approximately \$ [REDACTED].

5. For fiscal year 2011, we mailed approximately [REDACTED] pieces of TMC advertising mail packages for which we paid the Postal Service approximately \$ [REDACTED].

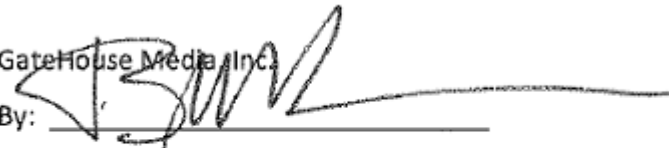
6. We estimate that the Postal Service will lose approximately \$ [REDACTED] from our mid-week TMC postage if the Valassis NSA is approved.

7. (Note: If you are a small newspaper -- 500 or fewer employees -- including the employees at all affiliated papers and companies, please provide information below.)

.....Explain that you are a small business that distributes advertising for firms that sell durable and semi-durable goods nationally.

.....Provide examples on how your newspaper will be impacted by the Valassis NSA.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 26, 2012.

GateHouse Media, Inc.
By: 
Name: Brad Harmon
Title: Vice President of Sales & Marketing