

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

**RATE AND SERVICE CHANGES TO
IMPLEMENT BASELINE NEGOTIATED
SERVICE AGREEMENT WITH LIFE LINE
SCREENING**

DOCKET NO. MC2007-5

**REDIRECTED RESPONSE OF WITNESS GREENBERG
TO INTERROGATORIES OF THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO
(APWU/USPS-T1-7)**

(December 19, 2007)

Life Line Screening (“Life Line”) presents the response of Witness Greenberg to the following interrogatory of the American Postal Workers Union, AFL-CIO:

APWU/USPS-T1-7. The Postal Service has partially redirected this question to Witness Greenberg.

Respectfully submitted,

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REDIRECTED RESPONSE OF LIFE LINE WITNESS GREENBERG TO
INTERROGATORY OF THE APWU (APWU/USPS-T1-7)

APWU/USPS-T1-7. In your response to APWU/USPS-T1-5 you indicate that Life Line Screening has informed the Postal Service that it will discontinue operations of six of its vans in early 2008. Was that the main reason for the original estimate of a 6 million piece decline in its base line estimates between 2007 and 2008?

RESPONSE:

No. At the time the base line estimates were provided, we assumed that there would be no new vans added in 2008 – but no reductions either. The decision to discontinue six vans was made in the fourth quarter of this year.

In our original filing (see page 10), we assumed a reduction in absolute mail volumes and mail volumes per screening absent an NSA because:

- (1) Life Line Screening is actively investing in alternative marketing channels.
- (2) Direct mail costs continue to rise, reducing direct mail profitability.
- (3) Life Line Screening planned to implement statistical suppression models.