

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

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Postal Rate and Fee Changes, 2006

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Docket No. R2006-1

**OBJECTIONS OF THE GREETING CARD ASSOCIATION  
TO FIRST INTERROGATORIES OF UNITED STATES  
POSTAL SERVICE DIRECTED TO WITNESS  
RAYMOND MORRISSEY (USPS/GCA T3-1-3)**

**(September 18, 2006)**

The Greeting Card Association ("GCA") hereby objects in part to the following interrogatories and requests for production of documents of the United States Postal Service: USPS/GCA T3-1-3

Respectfully submitted,

*/s/ James Horwood* \_\_\_\_\_

James Horwood  
Spiegel & McDiarmid  
1333 New Hampshire Ave. NW, 2<sup>nd</sup> Floor  
Washington, D.C. 20036

Date: September 18, 2006

## **USPS/GCA-T3-1**

Please provide copies of all correspondence, e-mails, documents and other communications sent by the Greeting Card Association, its members, affiliates and/or representatives, in 2005 and 2006, to the United States Postal Service relating to the design and/or operation of a test by the United States Postal Service of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. If there are any communications for which a duplicate hard copy does not currently exist and cannot be created, please provide a summary of the communication, the date on which it was transmitted, and identify by name and title the senders and recipients.

**OBJECTION:** GCA objects to the requested production to the extent it encompasses communications between GCA (and in particular communications by its counsel) to the United States Postal Service that were made for purposes of settlement and subject to expectations of confidentiality in connection with R2005-1. GCA further objects to the production of any information not within its custody, possession and control. GCA otherwise anticipates producing material responsive to the request and is conducting a file search to identify responsive material.

## **USPS/GCA-T3-2**

Please provide copies of all correspondence, e-mails, documents and other communications created by the Greeting Card Association, its members, affiliates and/or representatives, in 2005 and 2006, which discuss the results of any tests conducted by the United States Postal Service in either 2005 or 2006 of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. If there are any communications for which a duplicate hard copy does not currently exist and cannot be created, please provide a summary of the communication, the date on which it was transmitted, and identify by name and title the senders and recipients.

**OBJECTION:** GCA objects to the requested production to the extent it encompasses communications between GCA (and in particular communications by its counsel) to the United States Postal Service that were made for purposes of settlement and subject to expectations of confidentiality in connection with R2005-1. GCA further objects to the production to the extent it calls for the production of any material that is protected on grounds of attorney-client privilege. GCA further objects to the production of any information not within its custody, possession and control. GCA otherwise anticipates producing material responsive to the request and is conducting a file search to identify responsive material.

### **USPS/GCA-T3-3**

Please provide copies of all correspondence, e-mails, documents and other communications received in 2005 and 2006 by the Greeting Card Association, its members, affiliates and/or representatives from the United States Postal Service regarding the design, operation, and/or results of any postal test of the machinability and/or readability of envelopes or cards currently defined as nonmachinable by the Domestic Mail Classification Schedule and Domestic Mail Manual. For any documents reflecting test results, please indicate as accurately as possible, the date on which such results were first received by GCA, its members, affiliates and/or representatives; and identify each recipient by name and title.

**OBJECTION:** GCA objects to the requested production to the extent it encompasses communications between GCA (and in particular communications by its counsel) to the United States Postal Service that were made for purposes of settlement and subject to expectations of confidentiality in connection with R2005-1. GCA further objects to the production of any information not within its custody, possession and control. GCA otherwise anticipates producing material responsive to the request and is conducting a file search to identify responsive material.