

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR PROTECTIVE
CONDITIONS FOR MATERIALS REQUESTED IN AAPS/USPS-T36-4
(July 20, 2006)

The Postal Service requests the Commission to establish protective conditions to govern the materials requested in an interrogatory request of the Association of Alternative Postal Systems (AAPS/USPS-T36-4), which was filed on July 6, 2006. The interrogatory states:

Has the Postal Service requested or received any studies of the alternate delivery industry since the 1999 update to the SAI report? If so, please describe such studies and provide copies of any reports or updates produced.

The material responsive to the interrogatory is a report by SAI, dated August 2000.

The information is proprietary and commercially sensitive.

The August 2000 SAI report updates early versions which had been the subject of extended motions practice and discovery disputes in Docket Nos. R97-1 and R2000-1. See, e.g. Presiding Officer's Ruling R2000-1/21 (March 28, 2000). In both cases, the Commission granted protective conditions that permitted review of the material only if the requesting participant certified compliance with the stated conditions. Moreover, the Commission permitted the redaction of SAI researchers' and the Postal Service's comments and conclusions on, and analysis and/or interpretation of, the underlying factual data. In addition, the Postal service was permitted to redact the names of the companies studied as well as other information that would identify the company, such as product names. *Id* at 3.

Given the earlier precedent, the Postal Service does not wish to engage in extended motions practice. It will stipulate to the production of the report subject to appropriate protective conditions. In the instant docket, the Presiding Officer issued protective conditions for information concerning the FedEx agreement. P. O. Ruling R2006-1/5 (June 15, 2006), as supplemented by P.O. Ruling R2006-1/10 (June 30, 2006). The Postal Service requests that the Commission adopt these same protective conditions for the August 2000 SAI report. It also requests that the Commission permit the same type of redactions that were permitted in PO. Ruling R2000-1/21, discussed above. The Postal Service is prepared to make redactions and file the document once the requested ruling is issued.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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July 20, 2006