

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

JOINT MOTION OF THE UNITED STATES POSTAL SERVICE
AND LIFE LINE SCREENING FOR PROTECTIVE
CONDITIONS FOR MATERIALS REQUESTED IN
OCA/USPS-T1-1-2
(September 21, 2007)

The United States Postal Service and Life Line Screening hereby jointly move for establishment of protective conditions for the materials requested in the following interrogatories: OCA/USPS-T1-1-2. The Postal Service and Life Line Screening respectfully ask the Commission to issue a protective order prohibiting the public disclosure of this information in accordance with Rule 31(a) of the Commission's Rules of Practice and Procedure.

The calculations and workpapers requested by the Office of Consumer Advocate (OCA) in these interrogatories involve highly confidential, commercially-sensitive data that, if publicly disclosed, would reveal details of Life Line Screening's mailing practices and business strategy. Publicly revealing this information could damage Life Line Screening's competitive position. However, the Postal Service and Life Line Screening are willing to submit the data responsive to these interrogatories to the Commission under seal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Elizabeth A. Reed
475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3179, Fax -6187

LIFE LINE SCREENING

By its attorneys:

Ian D. Volner
Rita L. Brickman
Matthew D. Field
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com