

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BRADFORD GROUP

Docket No. MC2007-4

JOINT SUPPLEMENTARY COMMENTS TO JOINT MOTION OF THE UNITED
STATES POSTAL SERVICE
AND BRADFORD GROUP FOR PROTECTIVE
CONDITIONS FOR MATERIALS REQUESTED IN
OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22
(September 28, 2007)

The United States Postal Service and Bradford Group hereby jointly file comments to supplement their motion of September 20, 2007 for establishment protective conditions for the materials requested in the following interrogatories: OCA/USPS-T1-19(c), 20, 21(c), 20(f), 20(i), and 22. The Postal Service and Bradford Group 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 materials requested by these interrogatories contain a breakdown of the Bradford Group's mail volume by sortation tier and dropship discount. Publicly revealing this information would provide Bradford's competitors with insight into Bradford's costs and mailing practices, including commingling and the percentage of mail that Bradford dropships. This information could enable

Bradford's competitors to mimic Bradford's proprietary business practices, doing
Bradford competitive harm.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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