

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

**RATE AND SERVICE CHANGES TO
IMPLEMENT BASELINE NEGOTIATED
SERVICE AGREEMENT WITH BOOKSPAN**

DOCKET NO. MC2005-3

**MOTION OF BOOKSPAN FOR PROTECTIVE ORDER REGARDING
RESPONSES TO INTERROGATORIES OF THE
OFFICE OF THE CONSUMER ADVOCATE**

(August 30, 2005)

Bookspan hereby moves to file specified responses to the questions of the Office of the Consumer Advocate ("OCA") under seal. Bookspan respectfully asks the Commission to issue a protective order prohibiting the public disclosure of this information in accordance with Rule 31a of the Commission's Rules of Practice and Procedure.

Currently pending before this Commission is Bookspan's motion filed August 23, 2005 requesting that the Commission issue a protective order applicable to the following OCA questions:

OCA/USPS-T1-10 b and d, redirected to Witness Posch;
OCA/USPS-T1-13 a and b, redirected to Witness Posch;
OCA/BOOKSPAN-T2-8 b,c, d, e, and f;
OCA/BOOKSPAN-T2-9 a, b, and c;
OCA/BOOKSPAN-T2-10 a and b.

In this motion, Bookspan amends the above list, and extends its request for a protective order to include the following additional questions:

OCA/BOOKSPAN-T1-4
OCA/BOOKSPAN-T2-8(b), (c), (d) (e) and (f),
OCA/BOOKSPAN-T2-9
OCA/BOOKSPAN-T2-10

The interrogatories identified request detailed information concerning the “multiplier effect,” monthly mail volumes, and other information concerning Bookspan’s mailing practices beyond the types of mail eligible for a discount under this Negotiated Service Agreement.

The information requested in the above interrogatories is highly confidential and commercially sensitive. Publicly revealing this information could damage Bookspan’s competitive position and cause irreparable harm to Bookspan’s business interests. However, Bookspan is generally willing to submit a response to these interrogatories under seal.

Thus, Bookspan respectfully requests that the Presiding Officer enter an appropriate protective order, such as that issued by the Presiding Officer in response to a similar request earlier in this docket (POR-2, MC2005-3) that will enable Bookspan to respond under seal to the OCA interrogatories identified above.

Respectfully submitted,

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