

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

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

DOCKET NO. MC2007-4

**JOINT MOTION OF THE BRADFORD GROUP AND UNITED STATES
POSTAL SERVICE TO WITHDRAW MOTION FOR PROTECTIVE
CONDITIONS IN RESPONSE TO COMMISSION ORDER NO. 44
(OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22)**

The Bradford Group (“Bradford”) and the United States Postal Service (“Postal Service”) submit this joint motion to withdraw their request that the Commission establish protective conditions regarding the Postal Service’s response to OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22 and permit the Postal Service to file its responses to these interrogatories publicly. On November 9, 2007, the Commission issued Order No. 44, which refused to grant Bradford’s and the Postal Service’s earlier joint motion for protective conditions, filed October 19, 2007. In that Order, the Commission asked the parties to provide for *in camera* review of the workpaper sought by the Office of Consumer Advocate interrogatories and an explanation of how that workpaper could be used to Bradford’s detriment by Bradford’s competitors.

In light of Order No. 44, Bradford has decided to permit the Postal Service to file its response to these interrogatories, and the attendant workpaper, publicly. Although filing this information publicly creates a risk that Bradford will suffer competitive harm,

Bradford believes this risk is outweighed by the costs of further litigating this issue and the delay such litigation would cause. Accordingly, Bradford and the Postal Service move to withdraw their motion to file these responses under seal. The Postal Service will file revised responses to OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22 today, along with the attendant workpaper.

Respectfully submitted,

THE BRADFORD GROUP

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