

005876 ORIGINAL

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

RECEIVED
Nov 14 4 45 PM '96

SPECIAL SERVICES REFORM, 1996

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. MC96-3

MOTION OF THE UNITED STATES FOR PROTECTIVE CONDITIONS FOR
IN CAMERA DESIGNATION OF WRITTEN CROSS-EXAMINATION OF
NASHUA/MYSTIC/SEATTLE WITNESS HALDI

In accordance with Rule 31a of the Postal Rate Commission's Rules of Practice and Procedure and Rule 4 of the Special Rules of Practice, the United States Postal Service hereby moves that the following interrogatory responses of Nashua/Mystic/Seattle witness John Haldi be entered into the record as part of its written cross-examination *in camera*: USPS/NMS-T1-19-21.

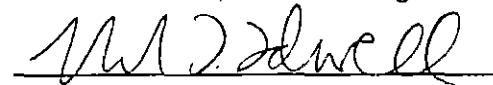
These interrogatory responses have been provided to the Postal Service under protective conditions, subject to assertions of privilege by NMS. The Postal Service respectfully requests that the Commission apply the same protective conditions to these interrogatory responses as have been applied to NMS-Workpaper 2 by Presiding Officer's Ruling No. MC96-3/24 (November 5, 1996).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

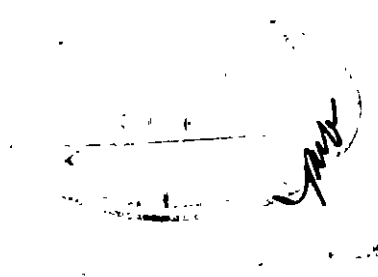
By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Michael T Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
November 14, 1996



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402
November 14, 1996