

BEFORE THE  
POSTAL RATE COMMISSION

RECEIVED

MAR 17 11 15 AM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

---

POSTAL RATE AND FEE CHANGES, 2000

---

DOCKET NO. R2000-1

---

MOTION ON CONSENT OF UNITED PARCEL SERVICE  
TO ADOPT PROTECTIVE CONDITIONS FOR  
DATA REQUESTED IN INTERROGATORIES  
UPS/USPS-T1-20, 23(b), 24(b), and 29(b)  
(March 17, 2000)

---

United Parcel Service ("UPS") hereby moves that the Presiding Officer adopt with respect to library references USPS-LR-I-211, 212, and 214<sup>1</sup>, which witness Xie identifies as containing sensitive information responsive to interrogatories UPS/USPS-T1-20, 23(b), 24(b), and 29(b), the protective conditions adopted by the Postal Service in Presiding Officer's Ruling No. R2000-1/11 in connection with witness Yezer's testimony. The Postal Service has authorized UPS to represent that the Postal Service consents to the relief requested in this Motion.

In interrogatories UPS/USPS-T1-20, 23(b), 24(b), and 29(b), UPS has requested that the Postal Service produce certain data files related to TRACS. The Postal Service first identified library references USPS-LR-I-211, 212 and 214 in response to interrogatories UPS/USPS-T1-8, 11, and 3, respectively, after having filed a partial

- 
1. In the absence of protective conditions, USPS-LR-I-211, 212, and 214 have not yet been filed with the Commission.

objection;<sup>2</sup> the Postal Service considers these library references as containing trade secrets and commercially sensitive information. However, the Postal Service has informed UPS that it has no objection to the production of these files as long as they are subject to appropriate protective conditions.<sup>3</sup>

As a result of discussions between counsel for the parties, and in order to facilitate production of the data in question, the Postal Service and UPS have agreed, subject to the Presiding Officer's approval, that USPS-LR-I-211, 212, and 214 may be produced subject to the protective conditions adopted in Presiding Officer's Ruling No. R2000-1/11 for certain of witness Yezer's supporting materials.

WHEREFORE, United Parcel Service respectfully requests that the Presiding Officer adopt with respect to library references USPS-LR-I-211, 212, and 214 to be filed

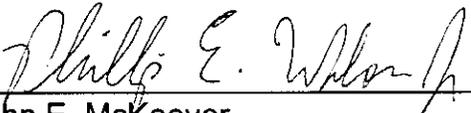
---

2. See Partial Objection of United States Postal Service to Interrogatories UPS/USPS-T1-2-3, 5-6, 8-9, 11-12 and 14-15 (February 25, 2000).

3. See, e.g., Response of Witness Xie to Interrogatories of United Parcel Service (UPS/USPS-T1-18-30) (March 13, 2000) [cover sheet].

by the Postal Service the protective conditions adopted in Presiding Officer's Ruling No.  
R2000-1/11.

Respectfully submitted,

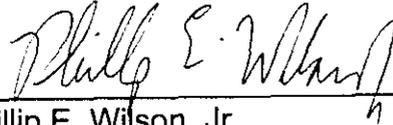
  
\_\_\_\_\_  
John E. McKeever  
William J. Pinamont  
Phillip E. Wilson, Jr.  
Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP  
3400 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2762  
(215) 656-3310  
and  
1200 Nineteenth Street, NW  
Washington, DC 20036-2430  
(202) 861-3900

Of Counsel.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



---

Phillip E. Wilson, Jr.  
Attorney for United Parcel Service

Dated: March 17, 2000  
Philadelphia, Pa.

60532