

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

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNCONTESTED MOTION OF UNITED STATES POSTAL SERVICE FOR  
USPS-LR-I-314 TO BE COVERED BY THE RULINGS ENACTING PROTECTIVE  
CONDITIONS FOR USPS-LR-I-194

The United States Postal Service hereby moves that USPS-LR-I-314, to be filed on Tuesday, May 2, 2000, be covered by the same protective conditions currently in force with regard to USPS-LR-I-194.<sup>1</sup> The materials to be provided in USPS-LR-I-314 consist of Postal Service Forms 8125 (concerning plant-verified drop shipments) and mailing statements, produced in response to the agreement worked out between counsel for United Parcel Service and counsel for the Postal Service concerning interrogatories UPS/USPS-T10-24 and 32 to witness Kingsley.<sup>2</sup>

Although the Postal Service is in the process of redacting the forms as indicated in its response to the UPS motion to compel, the Postal Service became concerned both that the identities of certain mailers might still be ascertained, and that the sheer number of forms and redactions might result in some information "slipping through the cracks" that should not. Accordingly, the Postal Service suggested and UPS agreed, that the forms would be placed under protective conditions. However, it is the

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<sup>1/</sup> See Presiding Officer's Ruling No. R2000-1/12, March 13, 2000; and Presiding Officer's Ruling No. R2000-1/20, March 27, 2000, March 27, 2000.

<sup>2/</sup> See Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatories UPS/USPS-T10-24 and 32 to Witness Kingsley, April 11, 2000; Response of United States Postal Service to Motion of United Parcel Service to Compel Production of Information and Documents Requested in Interrogatories UPS/USPS-T10-24 and 32 to Witness Kingsley, April 20, 2000.

understanding of both the Postal Service and UPS that only the forms themselves would be subject to the protective conditions, and that the index to the forms which the Postal Service is producing, as well as use of data from the redacted forms, would not be restricted.

Both the Postal Service and UPS thought that UPS' access to the materials could be expedited if USPS-LR-I-314 were simply subsumed under the same protective conditions that apply to USPS-LR-I-194. Accordingly, the Postal Service and UPS have agreed that the certifications UPS has filed with regard to USPS-LR-I-194 will be deemed sufficient to grant UPS access to USPS-LR-I-314. To further expedite UPS' access to the protected materials, the Postal Service has agreed that in addition to the two copies of USPS-LR-I-314 that will be filed with the Commission on May 2, 2000, a third copy will be supplied by the Postal Service directly to counsel for UPS on that same day.

The Postal Service requests that this uncontested motion be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 27, 2000

**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.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

**Susan M. Duchek**

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