

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

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR PROTECTIVE CONDITIONS FOR LIBRARY REFERENCE I-331  
(May 5, 2000)

The United States Postal Service hereby moves that the Commission establish protective conditions to govern intervenor access to information contained in Library Reference I-331.

Filed in response to KE/USPS-T29-53(f), this Library Reference contains an electronic file which identifies hundreds of Qualified Business Reply Mail (QBRM) account holders by name and location, and which provides estimates of their volumes for FY 98 and for the most recent 12 months. The Postal Service considers customer-specific QBRM volume data to be commercially sensitive and proprietary. Accordingly, the Postal Service considers that it is necessary to request that restrictions be placed on those intervenors (or their representatives) with a legitimate need to analyze the data in USPS-LR-I-331 for purposes of Docket No. R2000-1.<sup>1</sup>

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<sup>1/</sup> The only alternative method of disclosure would have been to provide the data, subject to a complex coding system which would mask the identity of hundreds of QBRM account holders, but which would allow readers to follow which volumes were tied to which accounts at which locations. However, it was determined that the time and burden associated with establishing such a system would materially delay the provision of the data, a distressing prospect to intervenors facing the May 22<sup>nd</sup> deadline for filing of testimony.

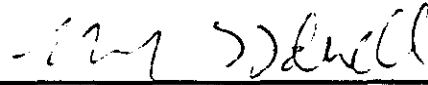
In order to provide this material for the use of the participants and the Commission in this proceeding, the Postal Service requests that the Commission adopt the protective conditions recently employed in Presiding Officer's Ruling No. R2000-1/41 (April 14, 2000).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

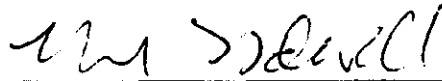


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May 5, 2000

### 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.



Michael T. Tidwell

May 5, 2000