

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  
TO BE ALLOWED TO FILE INFORMATION SPECIFIED IN PRESIDING OFFICER'S  
RULING NO. R2000/44 UNDER PROTECTIVE CONDITIONS  
AND MOTION FOR LATE ACCEPTANCE

Presiding Officer's Ruling No. R2000-1/44 required production of cost information associated with Express and Priority Mail containers on an individual and cost per-thousand bases. The United States Postal Service hereby moves that it be allowed to file the materials ordered to be produced under the standard protective conditions used widely throughout this proceeding.

The information requested in DBP/USPS Interrogatories DBP/USPS-5(i)8 contains cost data. In the course of searching for such information, the Postal Service became aware that public disclosure would be harmful to the Postal Service and, ultimately, its customers. In consulting with the custodian of the requested information, Glenn Kemp, Financial Analyst, Expedited/Package Services, it was discovered that the release of the information will likely erode the vendors' profit margins as other customers seek lower printing and supply costs comparable with those offered to the Postal Service. Further, if the unit prices were disclosed, it is unlikely that the Postal Service would again be able to negotiate such favorable terms, leading to higher costs to the Postal Service and, ultimately, its customers.

It is undisputed that the total price of the relevant contracts may be made public. However, it is the Postal Service's contention that the unrestricted release of the requested commercial/financial information is likely to cause substantial harm to the

person who supplied it, the Postal Service and, ultimately, the public. Accordingly, the Postal Service suggested and Mr. Popkin agreed, that the cost information ordered in Presiding Officer's Ruling No. R2000-1/44 be placed under protective conditions.

The Postal Service further moves that, to the extent the above motion is deemed untimely, late acceptance be granted. The undersigned recently became aware of the sensitivity of the unit price information requested by Mr. Popkin. After consulting with Mr. Kemp, it became apparent that protective conditions were necessary and appropriate. Further, there is no indication that Mr. Popkin will be prejudiced by the late filing of this motion.

Mr. Popkin was contacted concerning the need for protective conditions in response to Interrogatory DBP/USPS 5(i)8. He does not contest the filing of the before-mentioned motions.

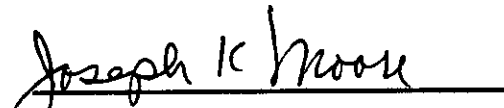
Consequently, the Postal Service requests that its motions for protective conditions and late filing be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

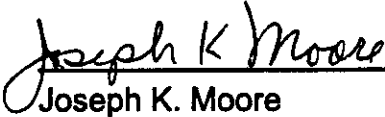
Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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May 18, 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.

  
\_\_\_\_\_  
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