

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

RECEIVED
Aug 9 4 27 PM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNCONTESTED MOTION OF THE UNITED STATES POSTAL SERVICE FOR
PROTECTIVE CONDITIONS FOR A LIBRARY REFERENCE THAT WILL
ACCOMPANY TESTIMONY REBUTTING MPA WITNESS NELSON
(August 9, 2000)

The United States Postal Service hereby moves that the Commission establish protective conditions for a certain library reference that will accompany the Postal Service's rebuttal testimony to MPA witness Nelson. Mr. Nelson has testified about comparisons between highway contract costs and Amtrak costs. In his analysis, he used material (highway mileage for specific origin-destination pairs) which is identified as proprietary by the providers of the software he uses. He omitted that material from the documentation supporting his testimony. The Postal Service has gained access to that material by purchasing the same software.

The Postal Service intends to file rebuttal testimony based on analysis using the same proprietary information. It would seem appropriate to make that analysis available to the Commission and any other interested parties. Rather than wait until the rebuttal testimony is actually filed on August 14th, the Postal Service is requesting that the Presiding Officer establish protective conditions now, so that necessary access will not be delayed. (Since witness Nelson already has access to the information in question, the Postal Service has agreed to furnish MPA directly a copy of the library reference for his use. Only other interested parties would need to meet the protective conditions.) The Postal Service submits that the protective conditions established earlier in this proceeding in P.O. Ruling R2000-1/55 (April 28, 2000) would be

appropriate. Counsel for both MPA and UPS have been consulted, and indicated that they do not oppose this motion. The library reference which would contain these materials will be designated as USPS-LR-I-432.

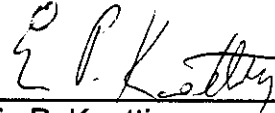
Accordingly, the Postal Service requests that protective conditions be adopted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

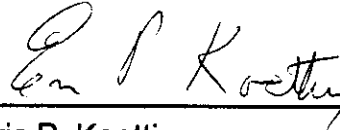
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Eric P. Koetting

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.



Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992 Fax -5402
August 9, 2000