

Before the
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

RECEIVED
Aug 15 1 46 PM '00

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

**STAMPS.COM'S OBJECTION TO PROVIDING ACCESS
TO STAMPS.COM'S PROTECTIVE MATERIAL TO DOUGLAS F. CARLSON**

Stamps.com objects to the application of Douglas F. Carlson for access to material submitted by Stamps.com under protective conditions. Mr. Carlson has not identified any reason or justification for being granted access to this material, which Stamps.com's regards as highly confidential. Moreover, the material was not provided in response to any of his discovery requests. To the extent the material is relevant to Commission proceedings, other parties – such as the Postal Service and the OCA – will adequately represent Mr. Carlson's interests in the material. Absent a compelling justification, he should not be provided access to this protected material, because such material is by its very terms not intended to be made available for inspection and review by the general public.

This objection is made without any intention of diminishing the valuable role Mr. Carlson serves as a member of the public who has chosen to intervene in this proceeding. The objection is made because it defeats the very basis for providing confidential material under protective conditions. If the material had been appropriate for public release, it would have been released publicly. The material is highly confidential. The Postal Service, the Commission, and other parties have agreed that

access should be restricted. If a member of the general public could gain access to the material simply by filing a request for access, the intended purpose of protective conditions would be defeated.

It should also be noted that because Mr. Carlson is not acting as an attorney in this proceeding, he is not subject to ethical and disciplinary rules that would serve to enforce the terms of the Commission's protective order.

Stamps.com therefore requests, with all due respect to Mr. Carlson, that the Commission deny Mr. Carlson's application for access to Stamps.com's protected material. Alternatively, the Commission should require Mr. Carlson to explain why he should be provided access to such material.

Respectfully submitted,

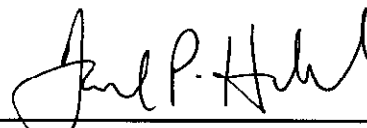


David P. Hendel
Wickwire Gavin, PC
8100 Boone Blvd., Suite 700
Vienna, VA 22182-2642

Dated: August 15, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this 15 day of August 2000, served the foregoing document in accordance with the Commission's Rules of Practice.



David P. Hendel