

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

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

MOTION OF THE UNITED STATES POSTAL SERVICE REQUESTING THE
ESTABLISHMENT OF PROTECTIVE CONDITIONS
FOR ITS RESPONSE TO DFC/USPS-15(c)

The United States Postal Service hereby moves that the Commission establish protective conditions to govern intervenor access to its response to interrogatory DFC/USPS-15(c).

The interrogatory, filed on October 25, 2001, requests that the Postal Service provide the approximate per-pound cost for transportation of mail on FedEx airplanes.

Estimated volumes to be transported under the FedEx contract are provided in USPS Docket No. R2001-1 Library Reference J-94 (Table 305) under protective conditions. Public disclosure of estimated cost per pound of flying mail in the FedEx network as requested by Docket No. C2001-3 interrogatory DFC/USPS-15(c), coupled with the public information in the Docket No, R2001-1 testimony of witness Hatfield (USPS-T-18), would allow a postal competitor to deduce the Docket No. R2001-1 volume information currently subject to those protective conditions. Accordingly, the Postal Service considers that the requested FedEx contract cost per pound figure responsive to Docket No. C2001-3 interrogatory DFC/USPS-15(c) should be made available to parties in Docket No. C2001-3 under the same protective conditions as were implemented under the terms of Docket No. R2001-1 Presiding Officer's Ruling No. R2001-1/5 (October 31, 2001).

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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December 3, 2001

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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