

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, 2001

Docket No. R2001-1

MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR PROTECTIVE CONDITIONS FOR RESPONSE TO INTERROGATORY OF  
DAVID B. POPKIN (DBP/USPS-51)  
(December 14, 2001)

The United States Postal Service hereby requests that the Commission establish protective conditions to govern access by other participants to facility-specific data requested in interrogatory DBP/USPS-51, filed on November 26, 2001. Interrogatory DBP/USPS-51(a) asks for "a listing of the Erent/space values and Current and Proposed Group Classifications that will be utilized for determining the rates for Post Office Box service at all postal facilities. Interrogatory DBP/USPS-51(b) asks for "a separate listing of those Erent/space values that have changed since the original list was prepared in the previous docket." Erent values by ZIP Code are facility-specific data. The Postal Service considers such facility-specific data to be commercially sensitive, especially in light of its value to competitors of post office box service in placing and designing their facilities.<sup>1</sup>

Similar information was provided in Docket No. R2000-1 under protective conditions established in Presiding Officer's Ruling No. R2000-1/11 (March 10, 2000). Those arrangements worked well in that proceeding, and should be applied here.

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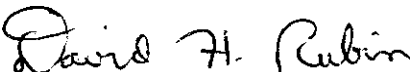
<sup>1</sup> Protective conditions are not required for fee group information by ZIP Code, although it may be simpler to provide all the information requested by this interrogatory in one file, all under protective conditions.

The Postal Service therefore requests that the standard protective conditions used elsewhere in this proceeding, such as in Presiding Officer's Ruling No. R2001-1/5, issued October 31, 2001, also be adopted here.

Respectfully submitted,

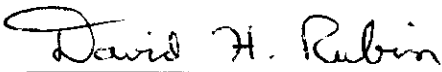
UNITED STATES POSTAL SERVICE

By its attorney:

  
\_\_\_\_\_  
David H. Rubin

### **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.

  
\_\_\_\_\_  
David H. Rubin

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2986; Fax -6187  
December 14, 2001