

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2001]

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

RESPONSE OF DAVID B. POPKIN TO THE UNITED STATES POSTAL SERVICE MOTION  
FOR PROTECTIVE CONDITIONS IN RESPONSE TO DBP/USPS-51

Interrogatory DBP/USPS-51 asked for both a listing of Erent / space values for all facilities and a separate listing of those that have changed since the previous Docket. I have no objection to those being provided in accordance with the same protective conditions that were utilized in that Docket.

Subpart a also asks for the Current and Proposed Group Classification for Post Office Box Service at all postal facilities. The Postal Service has stated in footnote 1 of their Motion<sup>1</sup> that this information does not require protective conditions. In that way, the data does not require protective action, can be discussed with others who have not completed the protective conditions affidavit, can simplify any follow-up interrogatories and briefing since it will not have to be done under seal. Therefore, I request that two separate responses be provided. The data that requires protective conditions be filed that way and the data that does not be filed without protective conditions<sup>2</sup>.

December 18, 2001      Respectfully submitted,

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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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 B. Popkin      December 18, 2001

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<sup>1</sup> Motion of USPS for Protective Conditions for Response to Interrogatory of David B. Popkin [DBP/USPS-51] filed on December 14, 2001

<sup>2</sup> For ease of evaluation, it would be helpful if the data filed under protective conditions also contained the fee group information adjacent to the Erent data.