

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

EVOLUTIONARY NETWORK DEVELOPMENT
SERVICE CHANGES, 2006

Docket No. N2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE
FOR APPLICATION OF PROTECTIVE CONDITIONS
TO USPS LIBRARY REFERENCES N2006-1/26 AND N2006-1/28
(September 15, 2006)

The United States Postal Service hereby moves for the application of protective conditions to the following Library References being filed today:

USPS LR N2006-1/26:

This Library Reference consists of electronic spreadsheets reflecting equations and regressions underlying the Postal Service's September 14, 2006, response to Presiding Officer's Information Request No. 8 Question 2. These spreadsheets rely on facility-specific operations and volumes data from various facilities in the USPS Bulk Mail Center network. These data are generally withheld from public disclosure by the Postal Service under the terms of 39 U.S.C. § 410 (c)(2), a practice that has been ratified in this proceeding by operation of Presiding Officer's Ruling No. N2006-1/7 (May 5, 2006). Because the spreadsheets do not lend themselves readily to parallel hard copy format in which protected data could be easily be segregated and redacted, the Postal Service has determined that unredacted copies, subject to appropriate protective conditions, are the most expeditious method of providing the Commission and intervenors access to the underlying equations and regressions. The Postal Service moves that the Commission apply the protective conditions that are appended to

Presiding Officer's Ruling No. N2006-1/7 (May 5, 2006).

USPS LR N2006-1/28: This Library Reference consists of an unredacted version of USPS Library Reference N2006-1/27, the Marina AMP Post Implementation Review document. The PIR measures achievement of savings estimated in the original Marina Area Mail Processing decision package, USPS Library Reference N2006-1/6.

As with an unredacted AMP package, the unredacted PIR contains operation-specific mail volumes and mail class-specific volumes at the Processing & Distribution Center level, and cost data from which such volumes could be derived. These disaggregated data are routinely withheld from public disclosure by the Postal Service under the terms of 39 U.S.C. § 410 (c)(2), a practice that has been ratified in this proceeding by operation of Presiding Officer's Ruling No. N2006-1/7 (May 5, 2006), which establishes protective conditions to be applied to such data. The Postal Service moves that those same conditions apply to the data (redacted from USPS Library Reference N2006-1/27) which appear in USPS Library Reference N2006-1/28.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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