

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 REFERENCE N2006-1/29
(October 23, 2006)

The United States Postal Service hereby moves for the application of protective conditions to the following Library References being filed today: USPS LR N2006-1/29.

The Library Reference consists of electronic spreadsheets reflecting facility-specific total piece handlings data for the 86 different Function 1 Management Operating Data System (MODS) mail processing facilities on the AMP Opportunity List, as well as operation-specific productivities for each of those facilities. Such 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), and on numerous occasions in omnibus rate litigation. 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).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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October 23, 2006