

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

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR PROTECTIVE
CONDITIONS FOR MATERIALS RESPONSIVE TO REQUEST BY
THE POSTAL RATE COMMISSION TO WITNESS MCCRERY
DURING THE DECEMBER 1, 2006 HEARINGS

The United States Postal Service hereby moves for the application of protective conditions to the materials requested by Commissioner Tisdale during Postal Service witness McCrery's appearance at the December 1, 2006 hearings. The Commissioner requested end of run summaries for various types of equipment within a single plant, similar to the information provided in response to MPA/USPS-T42-21(b).¹ These summaries contain facility-specific and operation-specific volume information that cannot easily be redacted. Because this information is of the type that is routinely withheld from public disclosure by the Postal Service in proceedings before the Commission and under the terms of 39 U.S.C. § 410 (c)(2), the Postal Service requests the application of protective conditions similar to those granted for information concerning the FedEx agreement. P.O. Ruling R2006-1/5 (June 15, 2006), as supplemented by P. O. Ruling R2006-1/10 (June 30, 2006). The nature of the information enables its ready use by participants, since, for example, piece data could be included in any subsequent public discussion as long as the identification of the associated facility were omitted.

¹ The Commissioner's request can be found at Tr. 34/11531-11533. The response to

The Postal Service will be able to provide the end of run summaries immediately upon receiving the grant of protective conditions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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