

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

**RATE AND SERVICE CHANGES TO
IMPLEMENT BASELINE NEGOTIATED
SERVICE AGREEMENT WITH LIFE LINE
SERVICES**

DOCKET NO. MC2007-5

**MOTION OF LIFE LINE SERVICES FOR PROTECTIVE ORDER
REGARDING RESPONSE OF WITNESS GREENBERG TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE
(OCA/LLS-T1-4(a), 4(c), 5, 6, 8, 9, 11(d), 11(f), 11(h), 11(i), 11(j), 11(k))**

(September 7, 2007)

Life Line Services hereby moves to file the responses of Life Line Witness Greenberg to Office of the Consumer Advocate (“OCA”) Interrogatories OCA/LLS-T1-4(a), 4(c), 5, 6, 8, 9, 11(d), 11(f), 11(h), 11(i), 11(j), and 11(k) under seal. Life Line respectfully asks the Commission to issue a protective order prohibiting the public disclosure of this information in accordance with Rule 31a of the Commission's Rules of Practice and Procedure.

The information sought by these interrogatories is highly confidential and commercially sensitive. Publicly revealing this information could damage Life Line’s competitive position and cause irreparable harm to Life Line’s business interests. These interrogatories relate to Life Line’s plans for future growth overall and in specific markets. Additionally, the interrogatories ask about the extent of Life Line’s operations

in specific markets and the relationship between those operations and growth opportunities. Publicly revealing this information would provide unwarranted insight into Life Line's business strategy to Life Line's competitors and place Life Line at a competitive disadvantage. These interrogatories also ask for details about Life Line's relationship with its affinity partners that, if publicly revealed, could jeopardize Life Line's relationships with those and future partners. Life Line is willing, however, to submit data responsive to these interrogatories to the Commission under seal.

Life Line respectfully requests that the Presiding Officer enter an appropriate protective order, such as that issued by the Presiding Officer in proceedings regarding the Bookspan NSA in Docket MC2005-3. (POR-7, issued September 26, 2005).

Respectfully submitted,

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