

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

RATE AND SERVICE CHANGES TO IMPLEMENT
FUNCTIONALLY EQUIVALENT NEGOTIATED
SERVICE AGREEMENT WITH BRADFORD GROUP

Docket No. MC2007-4

JOINT MOTION OF THE UNITED STATES POSTAL SERVICE
AND BRADFORD GROUP FOR PROTECTIVE
CONDITIONS FOR MATERIALS REQUESTED IN
OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22
(September 20, 2007)

The United States Postal Service and Bradford Group hereby jointly move for establishment of protective conditions for the materials requested in the following interrogatories: OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22. The Postal Service and Bradford Group respectfully ask the Commission to issue a protective order prohibiting the public disclosure of this information in accordance with Rule 31(a) of the Commission's Rules of Practice and Procedure.

The calculations and workpapers requested by the Office of Consumer Advocate (OCA) in these interrogatories involve highly confidential, commercially-sensitive data that, if publicly disclosed, would reveal details of Bradford Group's mailing practices and business strategy. Publicly revealing this information could damage Bradford Group's competitive position. However, the Postal Service and Bradford Group are willing to submit the data responsive to these interrogatories to the Commission under seal.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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