

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

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

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**DOCKET NO. MC2007-5**

**MOTION OF LIFE LINE SCREENING FOR PROTECTIVE ORDER  
REGARDING RESPONSE OF WITNESS GREENBERG TO COMMISSION  
INFORMATION REQUEST NO. 1**

**(October 5, 2007)**

Life Line Screening hereby moves to file the responses of Life Line Witness Greenberg to Commission Information Request No. 1 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. Question 1 asks whether Life Line uses First Class Mail for solicitation purposes, and if so, at what volume. Life Line's use or disuse of various types of mail is part of Life Line's confidential business strategy. Life Line is the leader in its industry, and it has achieved that position through its effective marketing strategy. See Testimony of Eric

Greenberg at 2. Life Line's competitors may seek to gain advantage by mimicking this strategy. Publicly revealing Life Line's use of different types of mail would provide Life Line's competitors with insight into Life Line's mailing practices that they could use to Life Line's detriment.

Questions 2 and 3 inquire as to the solicitation volume breakdown between current and new customers. Revealing this information would allow Life Line's competitors to determine how much of Life Line's marketing is focused on obtaining new customers and how much is focused on encouraging repeat business, allowing those competitors to similarly allocate their resources. Essentially, this information could enable Life Line's competitors to mimic Life Line's proprietary business practices, causing Life Line competitive harm.

Accordingly, Life Line respectfully requests that the Commission enter an order describing appropriate protective conditions, such as that issued by the Commission previously in this docket (Order No. 36, issued September 14, 2007).

Respectfully submitted,

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