

**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  
INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-  
CIO (APWU/LLS-T1-1-4, 6, and 7)**

**(October 5, 2007)**

Life Line Screening hereby moves to file the responses of Life Line Witness Greenberg to the American Postal Workers Union, AFL-CIO interrogatories APWU/LLS-T1-1-4, 6, and 7 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. APWU/LLS-T1-1 asks for information about Life Line's plans for future growth in specific markets and the demographics of its target markets, which if publicly revealed would give Life Line's competitors unwarranted insight into Life Line's business strategy. APWU/LLS-T1-2, 3, 4, and 7 ask for information regarding Life Line's

solicitation methods, the response rates to those methods, price comparisons between methods, and the factors that dictate Life Line's choices between these methods. All of this information is confidential as it provides the basis of Life Line's marketing strategies. If publicly revealed, Life Line's competitors could use this information to evaluate the relative effectiveness of Life Line's various marketing strategies, anticipate Life Line's future activities, and mimic the most effective strategies.

Life Line asks to file its response to APWU/LLS-T1-6 because it contains information regarding the necessary frequency of vascular ultrasound screenings. The frequency at which such screenings are conducted is an issue in the medical community for which there is no consensus and the response is based on Life Line's internal, non-public position.

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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