

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

STATION AND BRANCH OPTIMIZATION AND
CONSOLIDATION INITIATIVE, 2009

Docket No. N2009-1

UNITED STATES POSTAL SERVICE
NOTICE OF FILING ERRATA TO
RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN MOTION [Errata]
(September 15, 2009)

The United States Postal Service hereby gives notice that it is filing errata to its response to a David Popkin motion. Mr. Popkin's motion was filed on September 3, 2009, the Postal Service's response was filed yesterday. The Postal Service inadvertently filed an earlier draft version of its response. The version that follows below is the final version.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Sheela Portonovo

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-3012; Fax -6187
September 15, 2009

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RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN MOTION
(September 14, 2009)

On September 2, 2009, in accordance with 39 C.F.R. § 3007.21, the Postal Service filed two applications for non-public treatment in order to protect the facility finance numbers listed in Library References N2009-1/7 and N2009-1/11.¹ On September 3, 2009, David B. Popkin filed a Motion challenging these applications, and claiming that the Postal Service's applications "cannot be justified."² For the reasons stated in its applications, the Postal Service respectfully requests that the Commission deny Mr. Popkin's motion. The Postal Service also supports the Public Representative's response to Mr. Popkin's Motion.³

39 C.F.R. § 3007.33 requires the Commission to balance the nature and extent of the likely commercial injury identified by the Postal Service against the public interest in maintaining the financial transparency of a government entity competing in commercial markets. The Public Representative has stated that in the context of this case, there is a "complete lack of public interest in reviewing

¹ Notice of United States Postal Service of Filing of Library Reference N2009-1/7 and Application for Non-Public Status (September 2, 2009); Notice of United States Postal Service of Filing of Library Reference N2009-1/11 and Application for Non-Public Status (September 2, 2009).

² David B. Popkin Motion, at 4 (September 3, 2009).

³ Response of the Public Representative to David Popkin Motion (September 14, 2009).

the finance numbers.”⁴ The Postal Service agrees, and continues to maintain that the facility finance numbers should remain non-public.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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Daniel J. Foucheaux, Jr.
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⁴ *Id.* at 4.