

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

REVIEW OF NONPOSTAL SERVICES

Docket No. MC2008-1 (Phase II)

**LEPAGE’S 2000, INC. AND LEPAGE’S PRODUCTS, INC.’S
MOTION FOR PROTECTIVE CONDITIONS AND *IN CAMERA* DESIGNATION OF
ITS PRC SUBMISSION.**

In accordance with Section 3001.31a of the Postal Regulatory Commission Rules of Practice and Procedure, LePage’s 2000, Inc. and LePage’s Products, Inc. (collectively “LePage’s”) respectfully requests that its PRC submission related to its license agreement with the USPS (“License Agreement”) be given *in camera* treatment and be protected from public disclosure.

In its Order No. 392, the PRC found that the USPS’ licensing of its intellectual property to private sector licensees for the production of mailing and shipping products to be sold in non-postal retail locations was improper under Section 404(e)(3). The PRC ordered the termination of those licenses by no later than December 31, 2010. Order No. 392 at 27. However, upon a showing that termination would cause hardship, the PRC invited further submissions for any request to extend the License Agreement past the December 31, 2010 termination date. Id.

On June 30, 2010, LePage’s intends to file a comprehensive submission will detail the devastating financial and reputational harm to LePage’s that will result from the premature termination of the License Agreement. It also will set forth various facts that were previously unavailable, and therefore, not presented to the PRC prior to its January 14, 2010 order. LePage’s believes that these facts will demonstrate that the License Agreement is unique and appropriate under the Section 404(e)(3).

