

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

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Retail Access Optimization Initiative

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Docket No. N2011-1

**AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
MOTION FOR IMMEDIATE ACCESS TO  
NON-PUBLIC INFORMATION IDENTIFIED  
AS USPS-LR-N2011-1/NP4, NP5, NP6, NP7, NP8 and NP9  
(September 12, 2011)**

On September 9, 2011, the American Postal Workers Union, AFL-CIO (APWU) filed a Motion for Immediate Access to Non-Public Information Identified as USPS-LRN2011-1/NP4, NP5, NP6, NP7, NP8 and NP9. On that same day, by Order No. 10, the Presiding Officer granted APWU's Motion. Due to the urgent nature of the filing, APWU consultants were unable to complete their Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be included in the filing. Certifications for the following individuals have now been filed with the Commission:

Anita Morrison  
Partners for Economic Solutions  
Consultant to American Postal Workers Union, AFL-CIO

Abigail Ferretti  
Partners for Economic Solutions  
Consultant to American Postal Workers Union, AFL-CIO

A copy of each Certification is attached hereto.

For the reasons stated in our September 9, 2011 Motion for Access, APWU respectfully requests that the above named individuals be granted immediate access to the non-public Library References N2011-1/NP4, NP5, NP6, NP7, NP8 and NP9.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certifications today by email.

**Conclusion**

For the forgoing reasons and the reasons stated in APWU's Motion for Access, filed September 9, 2011, APWU respectfully requests that access to Library References USPS-LR-N2011-1/NP4, NP5, NP6, NP7, NP8 and NP9 be immediately granted to the above named individuals.

Respectfully submitted,

Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO