

ORIGINAL

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

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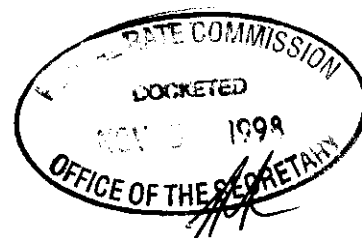
MAILING ONLINE SERVICE

Docket No. MC98-1

MOTION OF UNITED STATES POSTAL SERVICE
FOR REVISION OF PROTECTIVE CONDITIONS
SET FORTH IN PRESIDING OFFICER'S RULING NO. MC98-1/11
GOVERNING RELEASE OF RESPONSE TO OCA/USPS-T5-33
(November 5, 1998)

The Postal Service hereby moves that the protective conditions established in Presiding Officer's Ruling No. MC98-1/11 to govern the provision of materials in response to interrogatory OCA/USPS-T5-33 be revised slightly. The substantive change is the addition of the words "software development and evaluation" to the exclusions in paragraph 1(b). These words had been included in the protective conditions requested by the Postal Service in its motion of October 28, 1998, but were apparently inadvertently excluded in the protective conditions set forth in Attachment B to the Ruling. The other change sought is the addition of the words "and filed as Library Reference USPS-LR-15/MC98-1" to the definition of the materials subject to the protective conditions. This is simply for the sake of clarity. The requested revisions are shown in the attachment.

Since no party opposed our original request, which included these two phrases, the Postal Service requests that the Presiding Officer's issue a ruling with these revised



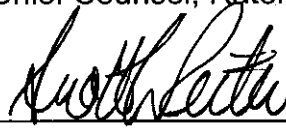
conditions as soon as possible, so that the material original requested by the OCA may be filed without undue delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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November 5, 1998

STATEMENT OF COMPLIANCE
WITH PROTECTIVE CONDITIONS

The following protective conditions limit access to materials provided in Docket No. MC98-1 by the Postal Service in response to OCA/USPS-T5-33, and filed as Library Reference USPS-LR-15/MC98-1 (hereinafter, "these materials"). Individuals seeking to obtain access to those materials must agree to comply with these conditions, and complete the attached certifications.

1. Only those persons who are either:
 - (a) employees of the Postal Rate Commission (including the Office of the Consumer Advocate) with a need-to-know; or
 - (b) a participant in Postal Rate Commission Docket No. MC98-1; or a person employed by such a participant, or acting as agent, consultant, contractor, affiliated person, or other representative of such participant for purposes related to the litigation of Docket No. MC98-1; shall be granted access to these materials. However, no person involved in competitive decision-making or software development and evaluation for any entity that might gain competitive advantage from use of this information shall be granted access to this material. "Involved in competitive decision-making" includes consulting on marketing or advertising strategies, pricing, product research and development, product design or the competitive structuring and composition of bids, offers or proposals.
2. No person granted access to these materials is permitted to disseminate those materials in whole or in part to any person not authorized to obtain access under these conditions.
3. The final date of any participant's access shall be
 - (a) the date on which the Postal Rate Commission closes the evidentiary record in Docket No. MC98-1; or
 - (b) the date on which that participant formally withdraws from Docket No. MC98-1; or
 - (c) the last date on which the person who obtains access is under contract or retained or otherwise affiliated with the Docket No. MC98-1 participant on whose behalf that person obtains access, whichever comes first. The participant immediately shall notify the Postal Rate Commission and United States Postal Service counsel in Docket No. MC98-1 of the

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", written over a horizontal line.

Scott L. Reiter

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