

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

VALASSIS NSA

Docket No. MC2012-14

VALASSIS NSA

Docket No. R2012-8

NEWSPAPER ASSOCIATION OF AMERICA
APPLICATION FOR NONPUBLIC TREATMENT

(June 29, 2012)

The Newspaper Association of America (“NAA”) hereby applies, pursuant to Commission rule of practice 3007.22, for nonpublic treatment of material designated as NAA/MC2012-14 NP 1, which contains raw data responses to a survey conducted by NAA and described in the Declaration of Jim Conaghan submitted herewith.

Section 3007.22 of the Commission’s rules of practice provides, in the case of an application by a private party for non-public treatment, as follows:

§ 3007.22 Content of third-party application for non-public treatment.

(a) The application for relief from public disclosure submitted by a party other than the Postal Service must clearly identify all materials believed to be protected from disclosure.

(b) The application for non-public treatment must include a specific and detailed statement setting forth:

(1) A description of the materials claimed to be non-public in a manner that, without revealing the materials at issue, would allow a person to thoroughly evaluate the basis for the claim that they are non-public;

(2) Particular identification of the nature and extent of the harm alleged and the likelihood of such harm; and

(3) Any other factors or reasons relevant to support the application.

The materials submitted are clearly identified and are contained in sealed envelopes and are labeled in a manner consistent with the descriptions stated above.

NAA/MC2012-14 NP 1 is entitled to non-public status. It consists of an Excel spreadsheet which compiles the raw survey responses from newspapers to the NAA survey. The data includes commercially sensitive financial information regarding each newspaper's business, revenues, and the distribution of its Total Market Coverage programs. This information is directly responsive to the Commission's request in the Notice of Inquiry and is not typically shared with competing firms. For these reasons, NAA collected the information subject to an understanding that it would not be disclosed in a way that would permit identification of particular newspapers.

Although NAA has removed the names of the individual respondents, it may be possible for an informed individual familiar with the industry or with access to mailing records to re-identify individual respondents. Making this information public could allow other firms to obtain a competitive advantage to the harm of the newspapers that responded to the survey.

Accordingly, the Newspaper Association of America respectfully requests nonpublic treatment of NAA/MC2012-14 NP 1 pursuant to rule 3007.22 *et seq.*

Respectfully submitted,

Newspaper Association of America

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