

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

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Periodic Reporting

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Docket No. RM2012-6

**APPLICATION FOR NONPUBLIC TREATMENT  
OF THE NATIONAL ASSOCIATION OF PRESORT MAILERS**

(January 7, 2013)

The National Association of Presort Mailers (NAPM) hereby respectfully applies, pursuant to Commission rule of practice 3007.22, for nonpublic treatment of the following:

- Exhibit NP-1: National Association of Presort Mailers survey data and data analysis (Excel file, labeled NAPM Survey Data – Data Analysis).

The NAPM survey data was collected for the purpose of preparing comments in this Docket No. RM2012-6, filed concurrently today by NAPM.

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 a sealed envelope and are labeled in a manner consistent with the descriptions stated above. The materials are entitled to non-public status.

The NAPM survey data and analysis provides empirical data on the mailing practices of 39 NAPM members that participated in the survey. This information is competitively sensitive to the participating NAPM members. A reasonably sophisticated person could likely deduce the identity of some or all of the participating members, and by doing so would obtain access to proprietary and confidential information regarding specific practices or levels of service offered by the participants which are not typically shared with competing firms. Thus, making this information public could allow competing firms to obtain a competitive advantage by gaining a better understanding of their rivals' costs and capabilities.

The data are submitted in support of Comments being filed concurrently today by NAPM in support of a new benchmark for the purposes of calculating worksharing discounts in Presort First-Class Letters. The information collected by the survey and presented in the analysis are highly relevant to these issues, while sensitive to the mailers concerned. Accordingly, non-public treatment pursuant to rule 3007.22 et seq. is appropriate.

Respectfully submitted,

    /s/    Robert Galaher      
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