

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

**RATE AND SERVICE CHANGES TO
IMPLEMENT BASELINE NEGOTIATED
SERVICE AGREEMENT WITH BOOKSPAN**

DOCKET NO. MC2005-3

**MOTION OF BOOKSPAN FOR PROTECTIVE ORDER REGARDING
RESPONSE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER
ADVOCATE, REDIRECTED FROM USPS WITNESS YORGEY
(OCA/USPS-T2-14)**

(August 19, 2005)

Bookspan hereby moves to file the response of Bookspan Witness Epp to Office of the Consumer Advocate Interrogatory OCA/USPS-T2-14 (redirected from Postal Service Witness Yorgey) under seal. Bookspan respectfully asks the Commission to issue a protective order prohibiting the public disclosure of this information in accordance with Rule 31a of the Commission's Rules of Practice and Procedure.

This interrogatory seeks detailed information about Bookspan's mailing practices beyond the classes of mail covered by this NSA. This information is highly confidential and commercially sensitive. Publicly revealing this information could damage Bookspan's competitive position and cause irreparable harm to Bookspan's business interests. Bookspan is willing, however, to submit a response to this interrogatory to the Commission under seal.

Bookspan respectfully requests that the Presiding Officer enter an appropriate protective order, such as that issued by the Presiding Officer in response to a similar request earlier in this docket (POR-2, MC2005-3).

Respectfully submitted,

Ian D. Volner
Rita L. Brickman
Matthew D. Field
Venable LLP
575 7th Street, NW
Washington, DC 20004-1601
(202) 344-4814
idvolner@venable.com
Counsel to Bookspan

dc2/674568