

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

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**RATE AND SERVICE CHANGES TO  
IMPLEMENT BASELINE NEGOTIATED  
SERVICE AGREEMENT WITH LIFE LINE  
SCREENING**

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**DOCKET NO. MC2007-5**

**JOINT MOTION OF LIFE LINE SCREENING AND THE UNITED STATES  
POSTAL SERVICE FOR EXTENSION OF TIME TO RESPOND TO  
COMMISSION ORDER NO. 39**

**(October 16, 2007)**

On October 9, 2007, the Commission issued Order No.39, denying the joint motion of Life Line Screening and the Postal Service for the establishment of protective conditions for the Postal Service's responses to Office of the Consumer Advocate interrogatories OCA/USPS-T1-1-2. In that Order, the Commission stated, "If Life Line seeks protective conditions with respect to the interrogatory responses addressed in this Order, it shall make further request to the Commission no later than October 16, 2007." Order No. 39 at 9. Pursuant to Rule 16 of the Commission's Rules of Practice, Life Line and the Postal Service request permission to file a response to this Order out of time.

The workpaper sought by these interrogatories contains commercially sensitive data that Life Line does not intend to reveal publicly. Life Line is currently drafting an affidavit outlining the competitive harm publicly filing this information could cause Life Line. The data contained in the workpaper, when combined with other information that

is already publicly available, would allow Life Line's competitors to reverse engineer Life Line's mailing practices. Life Line is currently the industry leader, and its proprietary mailing practices have played an important role in allowing Life Line to achieve this position. Publicly revealing this information could allow Life Line's competitors to benefit from the advantages Life Line derives through its mailing practices without expending the same resources as Life Line did in developing those practices. This inequity would place Life Line at a serious competitive disadvantage.

Life Line witness Eric Greenberg will prepare an affidavit that more fully describes how this information could be used to cause Life Line competitive harm. Regrettably, due to other business commitments, this affidavit will not be completed by the October 16<sup>th</sup> deadline. Life Line believes, however, that no party will be prejudiced by a short delay in filing this affidavit. In fact, the party most likely to suffer from the delay is Life Line itself, as Life Line has a strong interest in the speedy resolution of these proceedings and the implementation of the negotiated rates.

Accordingly, Life Line and the Postal Service move to file a response to Order No. 39, including an affidavit from witness Greenberg explaining the competitive harm publicly filing these workpapers will cause Life Line, out of time.

Respectfully submitted,

LIFE LINE SCREENING

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