

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

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Critical Entry Time (CET) Changes For Periodicals,  
2022  
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) Docket No. N2022-2  
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**MOTION OF NEWS/MEDIA ALLIANCE  
FOR ACCESS TO NON-PUBLIC MATERIALS  
FILED BY THE UNITED STATES POSTAL SERVICE**

(October 5, 2022)

Pursuant to 39 C.F.R. § 3011.301, the News/Media Alliance (“N/MA”) respectfully requests access to two non-public library references filed by the United States Postal Service in this docket: “USPS-LR-N2022-2-NP2” (filed on September 22, 2022) and “USPS-LR-N2022-2/NP3” (filed on October 3, 2022).

N/MA intends to provide the requested materials to the same individuals who were previously approved by the Commission as reviewing representatives for N/MA in the Presiding Officer’s Ruling No. N2022-2/1 (issued September 8, 2022). As before, N/MA would like its designated representatives to review the non-public library references in order to better assess the impact of the Postal Service’s proposed changes and to aid its participation in this proceeding.

N/MA is authorized to state that the Postal Service does not oppose this motion.

For the Commission’s convenience, the reviewing representatives to whom N/MA plans to provide the library references once again are:

- Holly Lubart (consultant for N/MA)

- Rita Cohen (consultant for N/MA)
- Sander Glick (SLS Consulting – economic consultant to N/MA)
- Peter M. Keisel (SLS Consulting – economic consultant to N/MA)
- Eric Berman (Venable – outside counsel for N/MA)
- William B. Baker (Potomac Law Group – outside counsel for N/MA)

Each of these individuals executed certifications committing to their compliance with the terms of the protective conditions established by the Commission to limit the disclosure and use of the non-public material, which N/MA filed with the Commission on September 7, 2022. These individuals will continue to abide by the terms of the protective conditions that they previously signed.

Respectfully submitted,

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October 5, 2022