

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

ANNUAL COMPLIANCE REVIEW, 2014

Docket No. ACR2014

**UNITED PARCEL SERVICE, INC.'S NOTICE OF FILING OF ADDITIONAL  
CERTIFICATIONS OF COMPLIANCE WITH PROTECTIVE CONDITIONS  
IN CONNECTION WITH REQUEST FOR ACCESS**

(January 16, 2015)

On January 15, 2015, the Commission granted the request by United Parcel Service, Inc. ("UPS"), that three individuals (Steig D. Olson of Quinn Emanuel Urquhart & Sullivan, LLP, Kevin Neels of the Brattle Group, and John McKeever of McKeever & Mitchell) be permitted to access certain non-public data submitted by the Postal Service as part of its Annual Compliance Report. See Order Granting Request For Access, Order No. 2321. In connection with their work, Mr. Olson and Mr. Neels will be assisted by others at their respective firms working under their direction. These persons are listed on Exhibit 1, attached hereto, which also includes signed copies of Appendix A of 39 C.F.R. part 3007, acknowledging their willingness to comply with protective conditions.

UPS respectfully requests that the Commission's grant of access to the non-public data be extended to these additional persons. UPS has conferred with the Postal Service, which has no objection to this request. Accordingly, UPS respectfully requests that the Commission grant this request as promptly as practicable, in light of the time pressures presented by this proceeding.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson\_\_\_\_\_

Steig D. Olson

Quinn Emanuel Urquhart & Sullivan, LLP

51 Madison Ave., 22<sup>nd</sup> Floor

New York, NY 10010

(212) 849-7152

steigolson@quinnemanuel.com

***Attorney for UPS***

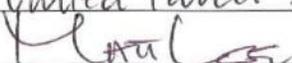
# **Exhibit 1**

1. Matthew Lee
2. Shea Gibbons
3. David LeRay
4. Leslie Epstein
5. Nicholas Powers
6. Mitchell Levy
7. Christine McCaffrey
8. Coleman Bazelon
9. Sarah Germain
10. Kristin Stenerson

CERTIFICATION

The undersigned represents that:

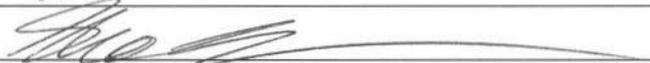
Access to these materials provided in the matter identified as Commission Docket No. ACR2014 by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as Commission Docket No. ACR2014. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Matthew Lee</u>
Firm	<u>Quinn Emanuel Urquhart &amp; Sullivan LLP</u>
Title	<u>Associate</u>
Representing	<u>United Parcel Service</u>
Signature	<u></u>
Date	<u>1/15/2015</u>

CERTIFICATION

The undersigned represents that:

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Name	<u>Shea Gibbons</u>
Firm	<u>Quinn Emanuel</u>
Title	<u>Associate</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1-15-2015</u>

CERTIFICATION

The undersigned represents that:

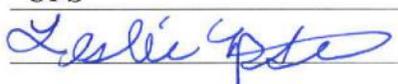
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Name	<u>David LeRay</u>
Firm	<u>Quinn Emanuel</u>
Title	<u>Associate</u>
Representing	<u>UPS</u>
Signature	<u>[Handwritten Signature]</u>
Date	<u>01-15-15</u>

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Name	<u>Leslie Epstein</u>
Firm	<u>Quinn Emanuel Urquhart &amp; Sullivan, LLP</u>
Title	<u>Paralegal</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>January 15, 2014</u>

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Name	<u>Nicholas E Powers</u>
Firm	<u>The Brattle Group</u>
Title	<u>Senior Associate</u>
Representing	<u>UPS</u>
Signature	<u>NE Powers</u>
Date	<u>1/15/2015</u>

CERTIFICATION

The undersigned represents that:

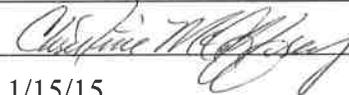
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Name	<u>Mitchell Levy</u>
Firm	<u>The Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/15</u>

CERTIFICATION

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Name	<u>Christine McCaffrey</u>
Firm	<u>The Brattle Group</u>
Title	<u>Administrative Assistant</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/15</u>

CERTIFICATION

The undersigned represents that:

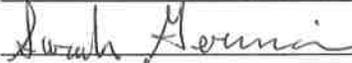
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Name	<u>Coleman Bazelon</u>
Firm	<u>The Brattle Group</u>
Title	<u>Principal</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/15</u>

CERTIFICATION

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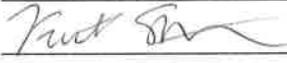
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Name	<u>Sarah Germain</u>
Firm	<u>The Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/15</u>

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Name	<u>Kristin Stenerson</u>
Firm	<u>The Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1/15/15</u>