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

PERIODIC REPORTING (PROPOSAL THIRTEEN)	))	Docket No. RM2015-7

UNOPPOSED MOTION OF
AMAZON FULFILLMENT SERVICES, INC.,
FOR ACCESS TO DOCUMENTS
FILED BY UNITED PARCEL SERVICE, INC.

(June 9, 2015)

Pursuant to 39 C.F.R. § 3007.40, Amazon Fulfillment Services, Inc. ("Amazon"), respectfully requests access to UPS-LR-RM2015-7/NP2, *Non-Public Material Supporting Supplemental Report of Dr. Neels*, a nonpublic library reference filed by United Parcel Service, Inc. ("UPS") yesterday in this docket. UPS has authorized us to state that it consents to this request. The United States Postal Service has authorized us to state that it does not oppose this request. Because comments on the UPS filing are due on July 8, Amazon respectfully requests that the Commission rule expeditiously on this motion.

Amazon designates the following individuals as its reviewing representatives pursuant to Appendix A to Part 3007 of 39 C.F.R.:

Christian T. Lundblad	Edward M. O'Herron Distinguished Scholar and Professor of Finance, Kenan-Flagler Business School, The University of North Carolina at Chapel Hill (economic consultant to Amazon)

Philip Howard	Ph.D. candidate in finance, Kenan-Flagler Business School, The University of North Carolina at Chapel Hill (economic consultant to Amazon)
Lawrence G. Buc	President, SLS Consulting (economic consultant to Amazon)
Sander Glick	Vice President, SLS Consulting (economic consultant to Amazon)
Peter M. Kiesel	Consultant, SLS Consulting (economic consultant to Amazon)
David M. Levy	Partner, Venable LLP (legal counsel for Amazon)
Robert P. Davis	Counsel, Venable LLP (legal counsel for Amazon)

Executed copies of the Appendix A protective conditions are attached.

Respectfully submitted,

/s/

David M. Levy
Robert P. Davis
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4732

Counsel for Amazon Fulfillment Services, Inc.

June 9, 2015

Appendix A

STATEMENT OF COMPLIANCE WITH PROTECTIVE CONDITIONS

This Statement of Compliance concerns library reference UPS-LR-RM2015-7/NP2, Non-Public Material Supporting Supplemental Report of Dr. Neels, a non-public library reference filed by United Parcel Service, Inc., in Commission Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*. UPS requests confidential treatment of the materials (hereinafter "these materials").

The following protective conditions limit access to these materials. Each person seeking to obtain access to these materials must agree to comply with these conditions, complete the attached certifications, and provide the completed certifications to the Commission and counsel for UPS.

1. Access to these materials is limited to a person as defined in rule 5(f), 39 CFR 3001.5(f), or an individual employed by such person, or acting as agent, consultant, contractor, affiliated person, or other representative of such person for purposes related to the matter identified as Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*. However, no person involved in competitive decision-making for any entity that might gain competitive advantage from use of this information shall be granted access to these materials. "Involved in competitive decision-making" includes consulting on marketing or advertising strategies, pricing, product research and development, product design, or the competitive structuring and composition of bids, offers or proposals. It does not include rendering legal advice or performing other services that are not directly in furtherance of activities in competition with a person or entity having a proprietary interest in the protected material.

2. No person granted access to these materials is permitted to disseminate them in whole or in part to any person not authorized to obtain access under these conditions.

3. Immediately after access has terminated under rule 39 CFR 3007.41 or 3007.51, a person (and any individual working on behalf of that person) who has obtained a copy of these materials shall certify to the Commission:

   (a) That the copy was maintained in accordance with these conditions (or others established by the Commission); and

(b) That the copy (and any duplicates) either have been destroyed or returned to the Commission.

4. The duties of each person obtaining access to these materials shall apply to material disclosed or duplicated in writing, orally, electronically, or otherwise, by any means, format, or medium. These duties shall apply to the disclosure of excerpts from or parts of the document, as well as to the entire document.

5. All persons who obtain access to these materials are required to protect the document by using the same degree of care, but no less than a reasonable degree of care, to prevent the unauthorized disclosure of the document as those persons, in the ordinary course of business, would be expected to use to protect their own proprietary material or trade secrets and other internal, confidential, commercially sensitive, and privileged information.

6. These conditions shall apply to any revised, amended, or supplemental versions of these materials provided in the matter identified as Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*.

7. The duty of nondisclosure of each person obtaining access to these materials is continuing, terminable only by specific order of the Commission, or as specified in paragraphs 9 and 10, below.

8. Each person granted access to these materials consents to these or such other conditions as the Commission may approve.

9. Any written materials that quote or contain materials protected under these protective conditions are also covered by the same protective conditions and certification requirements, and shall be filed with the Commission only under seal. Documents submitted to the Commission as confidential shall remain sealed while in the Secretary's office or such other place as the Commission may designate so long as they retain their status as stamped confidential documents.

10. If a court or other administrative agency subpoenas or orders production of confidential information which a person has obtained under the terms of this protective order, the target of the subpoena or order shall promptly (within 2 business days) notify UPS and the Postal Service of the pendency of the subpoena or order to allow it time to object to that production or seek a protective order.

CERTIFICATION

The undersigned represents that:

Access to these materials provided by the Postal Service in the matter identified as Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*, 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 Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*. 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: Lawrence G Rec

Firm: SLS Consulting, Inc

Title: President, SLS

Representing: Amazon Fulfillment Services, Inc.

Signature: [illegible]

CERTIFICATION

The undersigned represents that:

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Name: Robert Davis

Firm: Venable LLP

Title: of Counsel

Representing: Amazon Fulfillment Services, Inc.

Signature:

CERTIFICATION

The undersigned represents that:

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Name: Sander Glick

Firm: SLS Consulting, Inc.

Title: Vice President

Representing: Amazon Fulfillment Services, Inc.

Signature: Sander Glick

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Name: Philip Howard

Firm: Kenan-Flagler Business School

Title: PhD Canidate in Finance

Representing: Amazon Fulfillment Services, Inc.

Signature: Philip Howard

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Name: Peter M. Kiesel

Firm: SLS Consulting

Title: Consultant

Representing: Amazon Fulfillment Services, Inc.

Signature: Peter M. Kiesel

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Name: David M. Levy

Firm: Venable LLP

Title: Partner

Representing: Amazon Fulfillment Services, Inc.

Signature: David M. Levy

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Name: Christian T. Lundblad

Firm: Christian T. Lundblad

Title: Professor of Finance

Representing: Amazon Fulfillment Services, Inc.

Signature: CT. Lund