

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

PERIODIC REPORTING)
(UPS PROPOSALS ONE, TWO AND THREE)) Docket No. RM2016-2

**UNOPPOSED MOTION OF
AMAZON FULFILLMENT SERVICES, INC.,
FOR ACCESS BY AI DENG AND BEN MERMELSTEIN
TO MATERIALS FILED UNDER SEAL
BY UNITED PARCEL SERVICE, INC.
AND UNITED STATES POSTAL SERVICE**

(November 16, 2015)

Pursuant to 39 C.F.R. § 3007.40, Amazon Fulfillment Services, Inc. (“Amazon” or “AFSI”), respectfully requests the Commission allow two additional reviewing representatives, Ai Deng and Ben Mermelstein, to gain access to (1) UPS library reference UPS-RM2016-2/LR-NP1 (filed by UPS under seal in this docket on October 8, 2015), and (2) the non-public data filed in Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*.

In Order No. 2810, the Commission granted Amazon’s unopposed motion to make this material available to T. Scott Thompson, an economist affiliated with the economic consulting firm, Bates White, LLC. Since then, Dr. Thompson has asked that Dr. Deng and Dr. Mermelstein, both of whom are professional colleagues of Dr. Thompson at Bates White and will assist him in this case, also be authorized to review the material. Certificates of compliance with the

Commission's protective conditions, executed by Drs. Deng and Mermelstein, are attached to this motion.

The Postal Service and UPS have authorized Amazon to state that they do not oppose this request.

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.

November 16, 2015

CERTIFICATION

The undersigned represents that:

Access to the materials provided by the United States Postal Service and United Parcel Service in the matters identified as PRC Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*, and PRC Docket No. RM2016-2, *Periodic Reporting (UPS Proposals One, Two and Three)*, has been authorized by the Commission. The cover or label of the copies 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 PRC Docket No. RM2016-2. 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: Ai Deng

Firm: Bates White LLC

Title: Principal

Representing: Amazon Fulfillment Services, Inc.

Signature: 

Date: 11/12/2015

CERTIFICATION

The undersigned represents that:

Access to the materials provided by the United States Postal Service and United Parcel Service in the matters identified as PRC Docket No. RM2015-7, *Periodic Reporting (Proposal Thirteen)*, and PRC Docket No. RM2016-2, *Periodic Reporting (UPS Proposals One, Two and Three)*, has been authorized by the Commission. The cover or label of the copies 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 PRC Docket No. RM2016-2. 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: Ben Mermelstein

Firm: Bates White, LLC

Title: Senior Economist

Representing: Amazon Fulfillment Services, Inc.

Signature: 

Date: November 12, 2015