

BEFORE THE  
POSTAL REGULATORY COMMISSION

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ANNUAL COMPLIANCE REVIEW, 2015

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: Docket No. ACR2015  
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UNITED PARCEL SERVICE, INC.'S NOTICE OF FILING  
CERTIFICATIONS OF COMPLIANCE WITH PROTECTIVE  
CONDITIONS IN CONNECTION WITH MOTIONS FOR  
ACCESS

January 14, 2016

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On January 11, 2016, United Parcel Service, Inc. ("UPS") requested access to a selection of non-public library references the Postal Service filed with the Commission as part of its Annual Compliance Report. Attached in Exhibit 1 are docket-specific Certifications of Compliance with Protective Conditions for UPS's outside counsel and consultants.<sup>1</sup>

UPS respectfully requests that access be granted to the outside counsel and consultants listed below:

1. Steig Olson
2. John McKeever
3. David LeRay
4. Shea Gibbons
5. Leslie Epstein
6. Kevin Neels
7. Nicholas Powers
8. Mitchell Levy
9. Christine McCaffrey

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<sup>1</sup> As UPS made clear in its initial motions for access filed on January 11, UPS intends to use this data both in this docket and in the RM2016-2 docket, which UPS initiated to improve current costing methodologies. The Certifications have been edited to make this clear.

10. Coleman Bazelon
11. Sarah Germain
12. Kristin Stenerson
13. Jacob Light

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

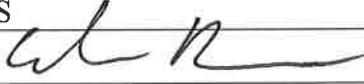
***Attorney for UPS***

# **Exhibit 1**

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as Commission Docket No. ACR2015 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 matters identified as Commission Docket Nos. ACR2015, RM2016-2, and any other docket to which the Commission grants me access. 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>Coleman Bazelon</u>
Firm	<u>The Brattle Group</u>
Title	<u>Principal</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>January 14, 2016</u>

CERTIFICATION

The undersigned represents that:

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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>1/13/2016</u>

CERTIFICATION

The undersigned represents that:

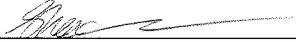
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Name	<u>Sarah Germain</u>
Firm	<u>The Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>UPS</u>
Signature	<u><i>Sarah Germain</i></u>
Date	<u>1/13/2016</u>

CERTIFICATION

The undersigned represents that:

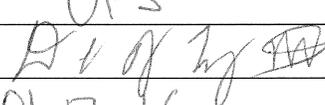
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Name	<u>Shea Gibbons</u>
Firm	<u>Quinn Emanuel Urquhart &amp; Sullivan</u>
Title	<u>Associate</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>1-14-2016</u>

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Name	<u>David LeRay</u>
Firm	<u>Quinn Emanuel</u>
Title	<u>Associate</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>01-13-16</u>

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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>1/14/2016</u>

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Name	JACOB LIGHT
Firm	THE BATTLE GROUP
Title	RESEARCH ANALYST
Representing	VPS
Signature	
Date	1/13/2016

CERTIFICATION

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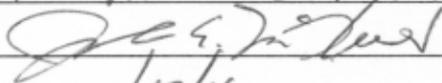
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Name	<u>Christine McCaffrey</u>
Firm	<u>The Brattle Group</u>
Title	<u>Administrative Assistant</u>
Representing	<u>UBS</u>
Signature	<u></u>
Date	<u>January 13, 2016</u>

CERTIFICATION

The undersigned represents that:

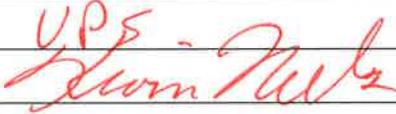
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Name	<u>JOHN E. MCKEEVER</u>
Firm	<u>MCKEEVER &amp; MITCHELL</u>
Title	<u>PARTNER</u>
Representing	<u>UNITED PARCEL SERVICE, INC.</u>
Signature	<u></u>
Date	<u>1/13/16</u>

CERTIFICATION

The undersigned represents that:

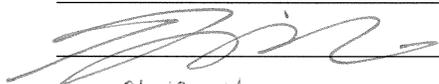
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Name	<u>Kevin Neels</u>
Firm	<u>The Brattle Group</u>
Title	<u>Principal</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>January 13, 2016</u>

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Name	<u>Steig Olson</u>
Firm	<u>Quinn Emanuel Urquhart &amp; Sullivan LLP</u>
Title	<u>Partner</u>
Representing	<u>UPS</u>
Signature	<u></u>
Date	<u>01-13-16</u>

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Name	<u>Nicholas Powers</u>
Firm	<u>The Brattle Group</u>
Title	<u>Senior Associate</u>
Representing	<u>UPS</u>
Signature	<u>Nicholas E Powers</u>
Date	<u>January 13, 2016</u>

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Name	<u>Kristin Skenerson</u>
Firm	<u>The Brattle Group</u>
Title	<u>Research Analyst</u>
Representing	<u>Guinn Emanuel</u>
Signature	<u></u>
Date	<u>1/13/2016</u>