

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 SECOND NOTICE  
REGARDING SECOND MOTION FOR ACCESS

January 22, 2016

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On January 21, 2016, United Parcel Service, Inc. ("UPS") filed a notice regarding the consent of the Postal Service and Canada Post to UPS's narrowed request for access to NP13.<sup>1</sup>

In that notice, UPS noted that the anonymous Counterparty cited in the Postal Service's response was still considering its position, but that UPS had proactively addressed the Counterparty's concerns expressed in its letter by signing the Commission's protective order. See 39 C.F.R. Part 3007, Appendix A. UPS has since conferred with counsel for the Counterparty, and has reaffirmed its commitment to comply with the terms of the protective order that UPS's outside counsel and consultants have signed. UPS is thus authorized to represent that the Counterparty does not oppose UPS's motion to access NP13.

Accordingly, UPS respectfully requests that the Commission grant its outside counsel and consultants access to NP13.

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<sup>1</sup> UPS narrowed its original request without prejudice to renewing the request, at a later time, if it becomes necessary to access data within NP2, NP5, NP6, NP9, NP14, and NP22.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

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

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