

BEFORE THE
POSTAL REGULATORY COMMISSION

MARKET TEST OF EXPERIMENTAL :
PRODUCT GLOBAL ECOMMERCE :
MARKETPLACE (GEM) NON-PUBLISHED : Docket No. MT2016-1
RATES :

MOTION OF UNITED PARCEL SERVICE, INC. FOR LEAVE TO
FILE REPLY IN FURTHER SUPPORT OF MOTION FOR
ACCESS

(MAY 16, 2016)

United Parcel Service, Inc. ("UPS") respectfully submits this motion for leave to file a reply to the United States Postal Service's Opposition to UPS's Motion for Access. Now that the Postal Service has explained its basis for opposing UPS's Motion for Access, UPS respectfully requests an opportunity briefly to respond to the Postal Service's arguments, which UPS believes lack merit. Although the Commission's rules do not authorize a reply to a response as a matter of right, the Commission may exercise its discretion to accept such a filing. See 39 C.F.R. § 3001.21(b). The Commission should exercise its discretion here and accept UPS's reply comments.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson

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