

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

MARKET TEST OF EXPERIMENTAL PRODUCT  
GLOBAL ECOMMERCE MARKETPLACE (GEM)  
NON-PUBLISHED RATES

Docket No. MT2016-1

**RESPONSE OF SHOPEX LLC TO  
UNITED PARCEL SERVICE INC.'S MOTION FOR ACCESS**  
(May 17, 2016)

On behalf of Shopex, LLC, the United States Postal Service (Postal Service) hereby files this response to United Parcel Service Inc.'s (UPS's) motion for access to certain non-public materials that the Postal Service filed in this docket.<sup>1</sup>

As background, on May 11, 2016, UPS filed a motion for access pursuant to Commission Rule 3001.21, 3007.40, and 3007.50, seeking access under protective conditions to the non-public materials the Postal Service filed with the Postal Regulatory Commission (Commission) in both its initial pleading as well as responses to information requests.

The Postal Service has consulted with Shopex, LLC, who acts as a supplier in the GeM Merchant Solution and whose information is included in the non-public materials. Included with this response as Attachment 1 is a letter from Shopex, LLC that respectfully asks that the Commission deny the motion for access due to concerns about the disclosure of this information.

The Postal Service urges the Commission to give due consideration to the objections raised by third parties as expressed in the attachment to this pleading.

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<sup>1</sup> United Parcel Service, Inc.'s Motion for Access, Docket No. MT2016-1, May 11, 2016.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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May 17, 2016



May 17th, 2016

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**Re. Postal Regulatory Commission**

Dear Mr. Coppin:

We are aware of the United Parcel Service (UPS) motion for access to confidential material filed as part of the GeM Merchant Solution market test in docket MT2016-1. We understand that some information pertaining to Shopex LLC is included in the United Postal Service's filings with the Postal Regulatory Commission under seal. If UPS's motion for access is granted, UPS representatives will have access to the confidential information of Shopex LLC as well.

We oppose the UPS motion for access for the same reasons as those stated in the USPS United States Postal Service Answer in Opposition to Motion of United Parcel Service for Access to Non-Public Materials, filed on May 12, 2016. In addition, we are extremely concerned about the disclosure of the confidential and sensitive information of our company to any competitor, its consultants, or its attorneys. We have put a lot of effort to build our business over the past 10 years, which could be undermined by unnecessary disclosure of our confidential information to a direct competitor. As mentioned in the USPS response, there is always a risk of some unauthorized disclosure. The Commission should not underestimate that risk, or the harm that can be caused to our company in the event that our sensitive business information is inadvertently made public.

We urge the Postal Regulatory Commission (PRC) to deny the UPS motion for access. We authorize the USPS to file this letter publicly with the Commission on our behalf in order to oppose the UPS motion for access and in order to document our clear opposition.

Sincerely,



Raimundo Martinez  
CEO  
Shopex LLC