THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, Plaintiff, v. AMAZON.COM, INC., Defendant.	No. 2:14-CV-01038-JCC **DECLARATION OF AARON RUBENSON IN SUPPORT OF AMAZON.COM, INC.'S RESPONSE TO FTC'S MOTION TO SEAL** NOTED ON MOTION CALENDAR: Friday, June 26, 2015

Aaron Rubenson declares:

1. I am a Director of the Amazon Appstore and have been since July 2011. I make this declaration based upon personal knowledge as to which I am competent to testify.

2. I have reviewed the document that I understand was filed as Exhibit I to the FTC's Motion to Compel Discovery Responses. I am familiar with the document, dated July 2012, which is a confidential and proprietary internal Amazon PowerPoint presentation titled "In-App Purchasing Customer Refunds."

3. Exhibit I contains confidential and proprietary information about Amazon's data and practices relating to refunds of customers' in-app purchases. It includes confidential return-rate data for in-app purchases made through Amazon's Appstore; includes confidential sales information; and outlines proprietary, strategic proposals and plans for lowering refunds,

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

including future product and engineering solutions and customer-service education policies. This is the type of information that Amazon takes care to keep confidential. When relevant to its operations, to maintain its competitive position, or to ensure customer satisfaction, Amazon analyzes data that it collects and maintains. The data and analysis contained in Exhibit I represent one example of this, and disclosure of the information contained in Exhibit I would likely result in competitive harm to Amazon.

4. Amazon makes significant efforts to keep information like that in Exhibit I confidential. Those efforts include prohibiting distribution of such documents outside of Amazon, limiting the people within Amazon who may access such documents, and storing such documents in secure locations.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED at SEATTLE, WA this 24TH day of June, 2015.

Aaron Rubenson

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

CERTIFICATE OF SERVICE

I certify that on June 24, 2015, I electronically filed the foregoing Declaration of Aaron Rubenson In Support of Amazon's Response to FTC's Motion to Seal with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to attorneys of record.

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 24th day of June, 2015.

s/ David J. Burman

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000