

OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

mental stants

Inbound International Mail Operations –

Service Center

Audit Report

Report Number MS-AR-17-003

December 30, 2016



OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Highlights

subjec	t to inspection by U.S.
CBP.	

With limited exception, all

inbound international mail is

Background

The international mailing and shipping industry is growing significantly — global eCommerce topped \$1.55 trillion in 2015, and is projected to grow another 162 percent by 2020. The

International Service Center (ISC) in is one of five major facilities the U.S. Postal Service uses to receive inbound international mail. The Postal Service recorded inbound international mail volume of about 219 million pieces in fiscal year (FY) 2015, nearly for the service of which arrived at the service is a service of the service is a service is a service of the service is a service of the service is a service of the service is a service is a service of the service is a service is a service of the service of the service is a service of the service is a service of the service is a service of the service of the service is a service of the service is a service of the service

With limited exception, all inbound international mail is subject to inspection by U.S. Customs and Border Protection (CBP).



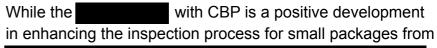
The significant mail volume at the ISC poses unique operational and technical challenges to the Postal Service and CBP. Specifically, CBP does

The Postal Service and CBP collaborated on a at the ISC beginning in November 2015 where the Postal Service provided to CBP

CBP can more quickly analyze these mailings to determine which to and relay those requests back to the Postal Service, which can remove the

Our objective was to assess inbound international mail operations and safety and security concerns with inbound international mail at the ISC.

What the OIG Found





First, the Postal Service



showed the Postal Service mailpieces that CBP

This occurred due to a combination of system and data integration complications, operational issues, and lack of sufficient controls to ensure these

Second, the Postal Service could improve the effectiveness of

Inbound International Mail Operations International Service Center Report Number MS-AR-17-003



OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

the	at the	ISC by		
				It only
received about	percent of	of this data on		
between late No	vember 20	15 and August	2016.	

Both the Postal Service and CBP recognize the importance of advance electronic data in helping CBP

. While international postal policy does not require postal operators to submit advance electronic data for international mailings, posts can request this information as part of separate (bilateral) international mailing agreements. We found examples of current Postal Service bilateral agreements that do not request this information and we think that including requests

In other matters, we noted that Postal Service data showed inconsistent performance at the ISC. We reported

We are not making a separate

recommendation on this issue as the Postal Service is finalizing corrective actions based on the September 2015 report.

If the Postal Service does not address these weaknesses, the Postal Service, its employees, and the public may be subject to unnecessary safety, security, financial, and operational risk; and the Postal Service's brand and public image may be impacted.

What the OIG Recommended

We recommended management develop controls to ensure that and take action to obtain additional advance electronic data from foreign postal

operators, such as requesting it in future bilateral agreements.

Inbound International Mail Operations International Service Center Report Number MS-AR-17-003

Transmittal Letter

OFFICE OF INSPECTOR GENI UNITED STATES POSTAL SE	
December 30, 2016	
MEMORANDUM FOR:	ROBERT CINTRON VICE PRESIDENT, NETWORK OPERATIONS FRANCA DAVIS MANAGING DIRECTOR, GLOBAL BUSINESS
	PLANT MANAGER, INTERNATIONAL SERVICE CENTER E-Signed by Rita Oliver ERIFY authenticity with eSign Desktt
FROM:	<i>for</i> Janet M. Sorensen Deputy Assistant Inspector General for Retail, Delivery and Marketing
SUBJECT:	Audit Report – Inbound International Mail Operations – International Service Center (Report Number MS-AR-17-003)
	results of our audit of Inbound International Mail Operations – tional Service Center (Project Number 16RG016MS002).
questions or need addition	eration and courtesies provided by your staff. If you have any onal information, please contact Joe Wolski, director, Retail, nal, or me at 703-248-2100.
Attachment	
cc: Corporate Audit and	Response Management

Table of Contents

Cover	
Highlights	1
Background	1
What the OIG Found	1
What the OIG Recommended	2
Transmittal Letter	3
Findings	5
Introduction	5
Summary	6
of Inbound International Mailings	7
Enhancements	8
Other Matters	10
Recommendations	12
Management's Comments	12
Evaluation of Management's Comments	12
Appendices	13
Appendix A: Additional Information	14
Background	14
Objective, Scope, and Methodology	15
Prior Audit Coverage	16
Appendix B: Management's Comments	17
Contact Information	19

Inbound International Mail Operations – International Service Center Report Number MS-AR-17-003

Findings

FY 2015. The

about

about

About 219 million pieces of

international mail entered the

U.S. from foreign countries in

mailings, many of which were

ISC received

pieces, or

of these

Introduction

This report presents the results of our self-initiated audit of the U.S. Postal Service's **Content of Service** International Service Center (ISC) in **Content** (Project Number 16RG016MS002). Our objective was to assess inbound international mail operations and safety and security concerns with inbound international mail at the **Content** ISC. See Appendix A for additional information about this audit.

ISCs receive inbound international mail from foreign countries and distribute and dispatch international mail received from a designated service area to specific foreign countries or a gateway exchange office.¹ The Postal Service operates ISCs in New York, Chicago, Los Angeles, San Francisco, and Miami.² With limited exceptions, all inbound international mail is subject to inspection by U.S. Customs and Border Protection (CBP).³

CBP ⁴			_
Generally when inbound international mail arrives at the	ISC, Postal Service employees		

About 219 million pieces of international mail⁵ entered the U.S. from foreign countries in fiscal year (FY) 2015. The ISC received about pieces, or about of these mailings (see Table 1), many of which were

Table 1. Inbound International Mail Volume at ISCs

ISC	FY	2015	FY	2014	FY	2013
	Volume (in millions)	Percent of Total	Volume (in millions)	Percent of Total	Volume (in millions)	Percent of Total
TOTAL	219.2	100.0%				

Source: U.S. Postal Service Office of Inspector General (OIG) analysis of Postal Service Enterprise Data Warehouse data.

1 Gateway exchange offices perform functions similar to those of ISCs. They distribute and dispatch international mail received from a designated service area in addition to low-volume mail received from ISCs.

- 2 Each ISC processes different categories of mail for different regions of the world.
 - Code of Federal Regulations, Title 19, Customs Duties, April 1978, Section 145.2 (Mail Subject to Customs Examination). International Mail Manual, May 2015, Section 711.1 (What Is Subject to Examination); Handbook T-5, International Mail Operations, May 2015, Section 381, Mail Requiring Customs Treatment.
- 4 The terms

3

6

5 For the purposes of this report, we focused on international mailings such as "mailings" or "mail" throughout the report. CBP inspects, and refer to them as

Inbound International Mail Operations -International Service Center Report Number MS-AR-17-003

The significant mail volume entering the USC poses unique operational and technical challenges to the Postal Service and CBP

	Specifically, CBP
	For example, CBP
s s s s s s s s s s s s s s s s s s s 	As these CBP recognized the need to enhance its inspection capabilities and operations. The Postal Service and CBP collaborated on a CBP at the CBP ISC that began in November 2015 and is designed to help CBP select CBP Under this CBP , the Postal Service takes advance electronic data (such as name,
CBP recognized the need	address, and item content) received from the sender
to enhance its inspection	
capabilities and operations.	
The Postal Service and CBP	While the with CBP is a positive development in enhancing the inspection process for the safety and security significant concerns have recently been discussed regarding both Postal Service ISC operations as well as the safety and security

collaborated on a

As

ISC that began in at the

November 2015 and is designed

to help CBP select

of inbound international mail. For example:

- Congressional interest The U.S. Senate Committee on Homeland Security and Governmental Affairs held a roundtable discussion in April 2016 to discuss synthetic drug smuggling in both the mail and express consignment environments. The Senate Judiciary and Finance committees both held subsequent hearings to discuss synthetic drug smuggling. During both of these events, the availability of advance electronic data on packages sent from foreign postal operators through the Postal Service, along with the challenges faced by CBP in inspecting growing volumes of mail, was highlighted for congressional stakeholders.
- Proposed legislation Legislation was introduced in September 2016 to require advance electronic data for non-letter class inbound international mail.7
- Recent OIG work We recently issued a series of reports highlighting operational issues at various ISCs. We found the

The expected continued growth in the international mailing and shipping marketplace poses interesting challenges for the Postal Service. This growth presents a significant revenue opportunity, with border-less commerce and active competitors. But it also presents sizable challenges related to promoting efficient operations and the safety and security of the mail.

Synthetics Trafficking & Overdose Prevention (STOP) Act, S. 3292, 114th Congress § 2(e), September 7, 2016.

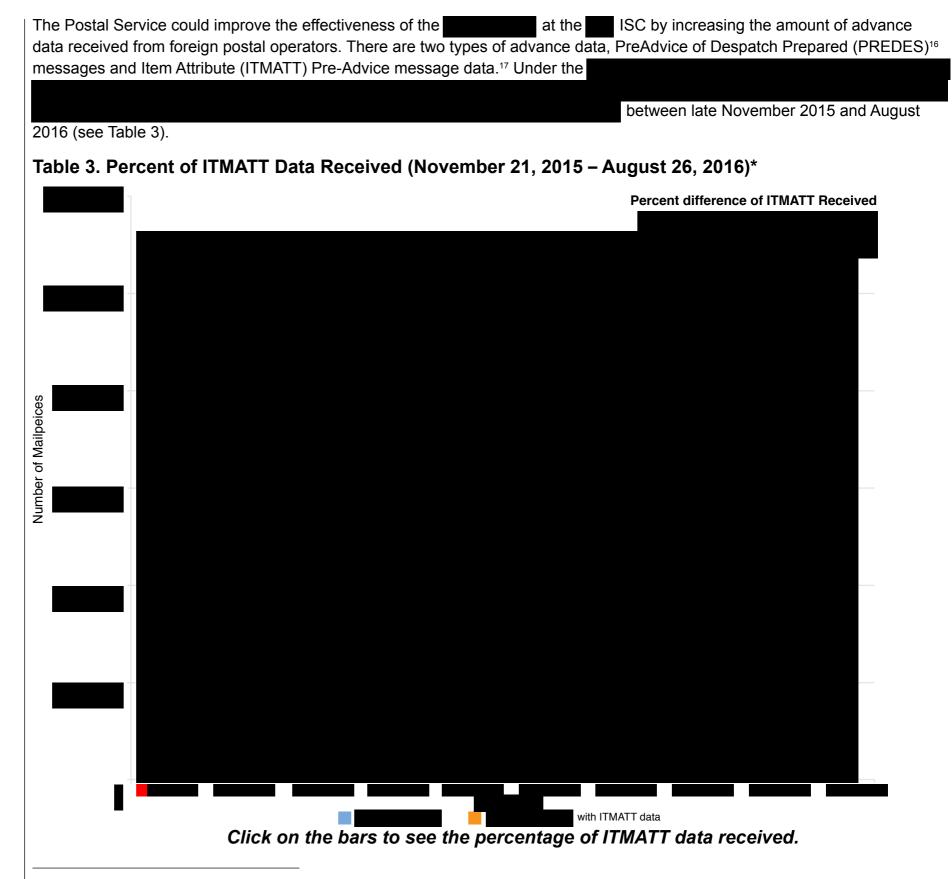
International Inbound Mail Verification (Report Number MR-MT-16-001, dated January 28, 2016). 8 9

Inbound International Mail Operations -International Service Center (Report Number MS-MT-16-003, dated September 21, 2016) and U.S. Postal Service International Service Center in Handling of Inbound International Mail at the (Report Number NO-MA-15-006, dated September 3, 2015). 10 Inbound International Mail Operations -International Service Center (Report Number MS-MT-16-004, dated September 28, 2016).

	Summary While the with CBP is a positive development in enhancing the inspection process for .
While the Sector with CBP is a positive development in enhancing the inspection	First, the Postal Service . Specifically, data showed the Postal Service mailpieces that CBP . Specifically, data . This occurred due to a combination of system and data integration complications, operational issues, and an accompanying lack of sufficient controls to ensure these .
process for	Second, the Postal Service could improve the effectiveness of the second at the second ISC by second It only received about between late November 2015 and August 2016. Both the Postal Service and CBP recognize the importance of this data in helping CBP second . While international postal policy does not require postal operators to submit advance electronic data for international mailings, posts can request this information as part of separate (bilateral) international mailing agreements. We found examples of current Postal Service bilateral agreements that do not request this information and we think including requests
	We also noted that Postal Service data showed inconsistent and performance at the service USC We reported on a similar issue in September 2015. ¹² The service issues we identified during this audit occurred due to The Postal Service completed We are not making a separate recommendation on this issue as the Postal Service is finalizing corrective actions based on the September 2015 report.
	If the Postal Service does not address these weaknesses, the Postal Service, its employees, and the public may be subject to unnecessary safety, security, financial, and operational risk; and the Postal Service's brand and public image could be impacted.
	The Postal Service was a sequired. Specifically, data showed the Postal Service mailpieces that CBP from November 2015 through September 2016. As shown in Table 2, these challenges occurred due to a variety of reasons, including:
	System and data integration complexities – in these categories.
	 11 We reviewed data for received on June 15 and 18, 2016. 12 U.S. Postal Service Handling of Inbound International Mail at the International Service Center in International Service Center in International Center in International

Table 2.	(Novem	nber 3, 2015 – September 2, 2016)
	Activity	Number of Items
Source: OIG analysis of Postal Servi	ce data.	
Nith limited exceptions, ¹ o CBP examination. ¹⁴	federal regulations state that all mail arriving from	outside the U.S. for delivery within the U.S. is subject
The Postal Service and C	BP recognize the challenges in this area and continu	ue to enhance their coordination through the
at the ISC. During ou	· · · · · · · · · · · · · · · · · · ·	reduce the number of as a result of
operational issues. CBP	are now are accountability. An ISC employee has also be	een assigned to monitor compliance. While these actions
vill help reduce	that occur due to operational issues, it will be dif	fficult for them to eliminate all Therefore, the
Postal Service must continuity of the service must continue to the service	nue to improve controls to ensure the ISC h	The Postal Service could consider as already dispatched.
	affect employees	, public safety, and security; and reflect poorly on the
Postal Service's brand of		, public callety, and coounty, and relieve poony on the
En	hancements	
	nancements	

The Postal Service and CBP recognize the challenges in this area and continue to enhance the coordination through the co



¹⁶ A PREDES message is sent from the country of origin to the country of final destination post. The message contains information about mail, including the number of items, the item number, weight, etc.

17 ITMATT: ITEM ATTribute pre-advice; ITMATT messages are exchanged between the origin and destination posts to provide information about an item including details of the sender, addressee, and item content,

Source: Postal service provided data from GBS.

*This includes all received at the New York, Miami, Los Angeles, Chicago, and San Francisco ISCs and the Honolulu Processing and Distribution Center.

We also noted that Postal Service data showed

inconsistent **performance** at the **ISC**.

International mail exchanged between postal operators is not required to include this data per domestic and international postal policy. Specifically, current U.S. laws and regulations¹⁸ do not require the Postal Service to obtain this advance electronic data for inbound international mailings and Universal Postal Union (UPU)¹⁹ regulations do not require the transmission of ITMATT data. But Postal Service and CBP officials recognize that advance electronic data assists the effectiveness of their mail processing and inspections operations. The Postal Service and other foreign postal operators can request this information as part of separate (bilateral) international mailing agreements. We found examples of current Postal Service bilateral agreements that do not request this information **20** and including requests for this information in future agreements could not only benefit Postal Service and CBP operations, but also foreign postal operators, whose mailings would be processed more timely.

brand or public image. While this

; affect employees, public safety, and security; and reflect poorly on the Postal Service's

Other Matters

ble 4.	Summary (Jul	y 12, 2016, for	and May – July 2	2016 for)
	Mailings				Subtotal
	4,806	60	250	1	311
	458	179	1	0	180
tal	5,264	239	251	1	491

Trade Act of 2002, Public Law, 107-210; §§ 343(a)(3)(K), August 6, 2002; Final Rule, Require Advance Electronic Presentation of Cargo Information, Federal Registe Volume 68, pages 68140 and 68150 (December 5, 2003).

19 Established in 1874, the UPU is the second oldest international organization worldwide. With its 192 member countries, the UPU is the primary forum for cooperation between postal administrations and creating international postal policies.

20 We reviewed the Postal Service's bilateral agreement with and found there was no requirement to provide ITMATT data.

We are r ns based on the Septe	The Postal Service com not making a separate re mber 2015 report. Spec processes. However, th	pleted ecommendation on this is cifically, Postal Service m hey still need to review	during this audit occurred ssue as the Postal Service nanagement has already d requirements for all m treamlined for reliability.	e is finalizing elivered service

Recommendations

We recommend the vice president, Network Operations, in coordination with the plant manager, U.S. Postal Service International Service Center in **Example**:

 1. Implement controls to ensure that include using _______. These could that have already been dispatched from the International Service Center.

We recommend management develop controls to ensure that

and take action to obtain additional advance electronic data from foreign postal operators, such as requesting it in future bilateral agreements.

We recommend the vice president, Network Operations, in coordination with the managing director, Global Business:

2. Take actions to obtain additional advance electronic data from foreign postal operators, such as requesting it in future bilateral agreements.

Management's Comments

Management agreed with our findings and recommendations.

Regarding recommendation 1, management stated they have already implemented some updates as of October 2016. The Postal Service has updated GBS to add

Needs Statement to add functionality to current equipment

The Postal Service has also drafted a Business

. Management stated they have already

implemented GBS updates and reporting enhancements and provided a target implementation date of August 2017 for

Regarding recommendation 2, management stated they have various initiatives underway to facilitate the transmission of Customs advance electronic data, including entering into two multilateral agreements for exchanging the data. The Postal Service has also entered into related agreements for the exchange of Customs data with foreign postal operators and solicited signatures on bilateral data sharing agreements with over foreign postal operators for transmitting ITMATT associated with Finally, the Postal Service is proposing to include

Management stated that obtaining additional advance electronic data from foreign postal operators is ongoing and provided a target implementation date of March 30, 2017, for incorporating related requirements for the pending bilateral agreements.

See Appendix B for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations.

Regarding the recommendations, management's corrective actions should address the issues identified in the report. The recommendations still require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. The recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendices

Click on the appendix title to the right to navigate to the section content.

Appendix A: Additional Information	14
Background	14
Objective, Scope, and Methodology	15
Prior Audit Coverage	16
Appendix B: Management's Comments	17

Appendix A: Additional Information

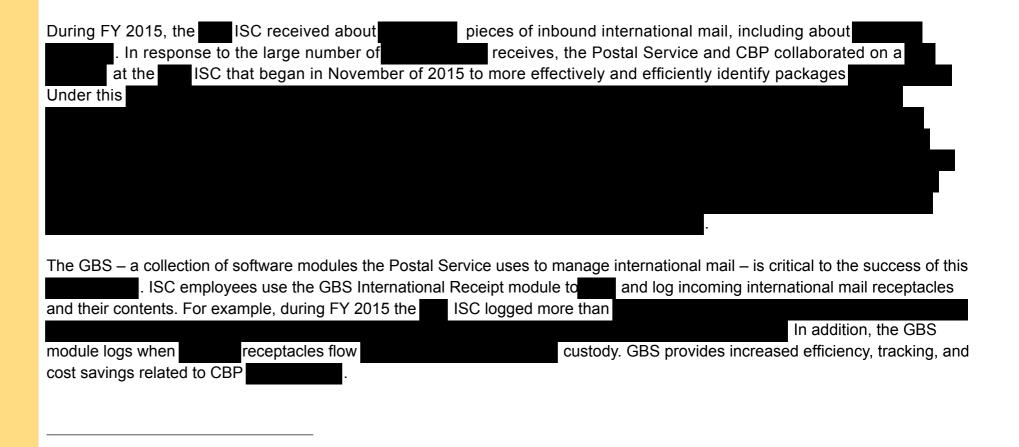
Background

The Postal Service established ISCs in 1996 to become more competitive in the international mail market. The Postal Service operates ISCs in New York, Chicago, Los Angeles, San Francisco, and Miami.²¹ ISCs receive inbound international mail from foreign countries and distribute and dispatch international mail received from a designated service area to specific foreign countries or to gateway exchange offices.²²

The Postal Service has verification processes for inbound international mail at all five ISCs to ensure that mail is prepared in accordance with Postal Service requirements and includes sufficient postage. The processes also include specific actions for identifying and handling authorized mailings, including how the Postal Service is to coordinate with other organizations such as the U.S. Postal Inspection Service and CBP. With limited exception, all inbound international mail is subject to inspection by CBP.²³



CBP officers have direct responsibility for monitoring incoming international mail to ensure that it does not present a health risk and is safe for processing.²⁴ CBP's approach is aligned with the president's National Strategy for Global Supply Chain Security, which calls for the protection of a global supply chain system that supports innovation and prosperity by securely, promptly, and reliably moving goods across our borders and around the world.²⁵



²¹ Each ISC processes different categories of mail for different regions of the world.

Inbound International Mail Operations International Service Center Report Number MS-AR-17-003

²² International gateway exchange offices distribute and dispatch international mail received from a designated service area in addition to low-volume mail received from other international Postal Service facilities.

²³ Code of Federal Regulations, Title 19, Customs Duties, April 1978, Section 145.2 (Mail Subject to Customs Examination). *International Mail Manual*, May 2015, Section 711.1 (What Is Subject to Examination); Handbook T-5, *International Mail Operations*, May 2015, Section 381 (Mail Requiring Customs Treatment).

²⁴ U.S. Postal Service Mandatory Stand-Up Talk, Security Measures in Place to Safeguard You and the Mail, March 17, 2011.

²⁵ CBP Performance and Accountability Report FY 2014.



Source: Postal Service.

The Trade Act of 2002 mandates that private transportation companies, such as UPS and FedEx, provide electronic manifest data to CBP before packages arrive in the U.S. Rather than require the Postal Service to comply with that requirement, the law directs the U.S. Department of Homeland Security and the U.S. Treasury Department, in consultation with the Postmaster General, to determine whether it is "appropriate" to apply this provision to the Postal Service.²⁶

Objective, Scope, and Methodology

Our objective was to assess inbound international mail operations and safety and security concerns with inbound international mail at the **ISC**. To accomplish our objective, we:

- Visited and observed operations at the ISC pertaining to inbound international mail.
- Interviewed managers and staff about the processing of inbound international mail procedures at the ISC.
- Interviewed CBP officials about their concerns about
- Reviewed inbound international mailing data from FYs 2013 2015.
- Reviewed the accuracy of international data.
- 26 Trade Act of 2002, Public Law, 107-210; §§343(a)(3)(K), August 6, 2002.

Reviewed past audit work and other publicly available research pertaining to the handling of inbound international mail.

Reviewed Postal Service policies and processes for all types of inbound international mail.

Compared Postal Service actions to prescribed policies and procedures pertaining to the handling of the inbound international mail.

We conducted this performance audit from June through December 2016, in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on December 2, 2016, and included their comments where appropriate.

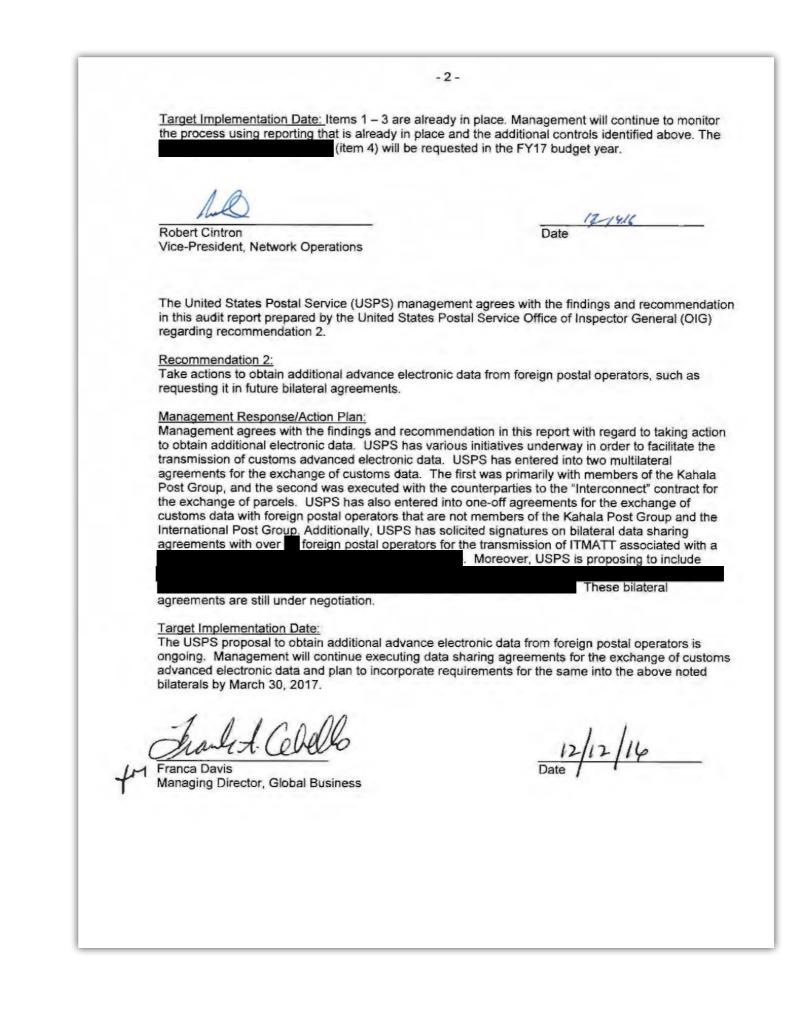
We assessed the reliability of inbound international mail volume, GBS **Contraction**, and Product Tracking System data by reviewing prior OIG work and verifying the data for reasonableness and discussing it with knowledgeable Postal Service staff. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Report Number	Objective	Final Report Date	Monetary Impact
Inbound International Mail Operations – Service Center	MS-MT-16-004	Highlight significant safety and security weaknesses at the Postal Service's ISC.	9/28/2016	
Inbound International Mail Operations – Marcon International Service Center	MS-MT-16-003	Highlight significant inbound international mail security weaknesses at the Postal Service's ISC.	9/21/2016	None
International Inbound Mail Verification	MR-MT-16-001	Highlight significant international inbound mail verification weaknesses at Postal Service ISCs at the locations.	1/28/2016	None
U.S. Postal Service Handling of Inbound International Mail at the International Service Center in	NO-MA-15-006	Determine whether the Postal Service is complying with established inbound international mail policies and procedures.	9/3/2015	None

Appendix B: Management's Comments

	ED STATES AL SERVICE
POSI	IL SERVICE
Dece	mber 12, 2016
	au Dillard tor, Audit Operations
This	correspondence is in response to Audit Report – Inbound International Mail Operations – International Service Center (OIG Recommendations Project Number 16RG016MS00)2.
	ecommend the Vice President, Network Operations, in coordination with the Plant Manager, d States Postal Service (USPS)
	These could include using that have dy been dispatched from the International Service Center.
Mana	gement Response/Action Plan:
	gement agrees with the OIG recommendations to implement further controls to ensure . USPS has already mented the following updates as of October 2016;
	Global Business Systems (GBS) has been updated to add an label which includes the barcode USPS personnel and THS employees have been trained to for CBP.
2.	GBS was also updated to create a module to CBP had previously USPS operations will now
3.	USPS is now generating a report by tour of all receptacles that have been (with user ID, workstation and time) The report is generated at the end of each tour to
4.	In addition to the changes already in place above, USPS is drafting a Business Needs Statement (BNS) to
475 L'EN	FANT PLAZA SW
WASHING	





Contact us via our Hotline and FOIA forms. Follow us on social networks. Stay informed.

> 1735 North Lynn Street Arlington, VA 22209-2020 (703) 248-2100