



Office of Inspector General | United States Postal Service

Management Alert

Key Issues with Channel Partners

Report Number 22-069-1-R23 | October 13, 2022



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Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

October 13, 2022

MEMORANDUM FOR: SHIBANI GAMBHIR
VICE PRESIDENT, BUSINESS DEVELOPMENT

THOMAS FOTI
VICE PRESIDENT, PRODUCT SOLUTIONS

A handwritten signature in black ink, reading "Amanda H. Stafford", is positioned above the "FROM:" field.

FROM: Amanda H. Stafford
Deputy Assistant Inspector General for Retail, Delivery, and
Marketing

SUBJECT: Management Alert – Key Issues with Channel Partners
(Report Number 22-069-1-R23)

This management alert presents issues identified during our ongoing audit of *Channel Partner Visibility and Compliance* (Project Number 22-069). The objective of this management alert is to communicate issues identified during our audit that require accelerated attention to U.S. Postal Service officials.

We appreciate the cooperation and courtesies provided by your staff. If you have questions or need additional information, please contact Janet Sorensen, Director, Sales, Marketing, and International, at 703-248-2100.

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction

This management alert presents issues the U.S. Postal Service Office of Inspector General (OIG) identified during the *Channel Partner Visibility and Compliance* audit (Project Number: 22-069). Our objective is to provide notification of these issues for accelerated attention and action. Specifically, we found material weaknesses in internal controls over the U.S. Postal Service's Channel Partner programs.

In recent years, the Postal Service designed a strategy to address issues related to its relationships with Channel Partners. Most recently, the Postal Service issued termination letters for its Resellers' contracts, effective September 30, 2022. The Postal Service established the USPS Connect eCommerce program in May 2022, to foster direct relationships with partners, including those that previously worked through Resellers. Although termination of the Resellers' contracts addresses some of the issues we have identified, it does not mitigate other risks that could continue with implementation of the Connect eCommerce program.

See [Appendix A](#) for additional information about this management alert.

Background

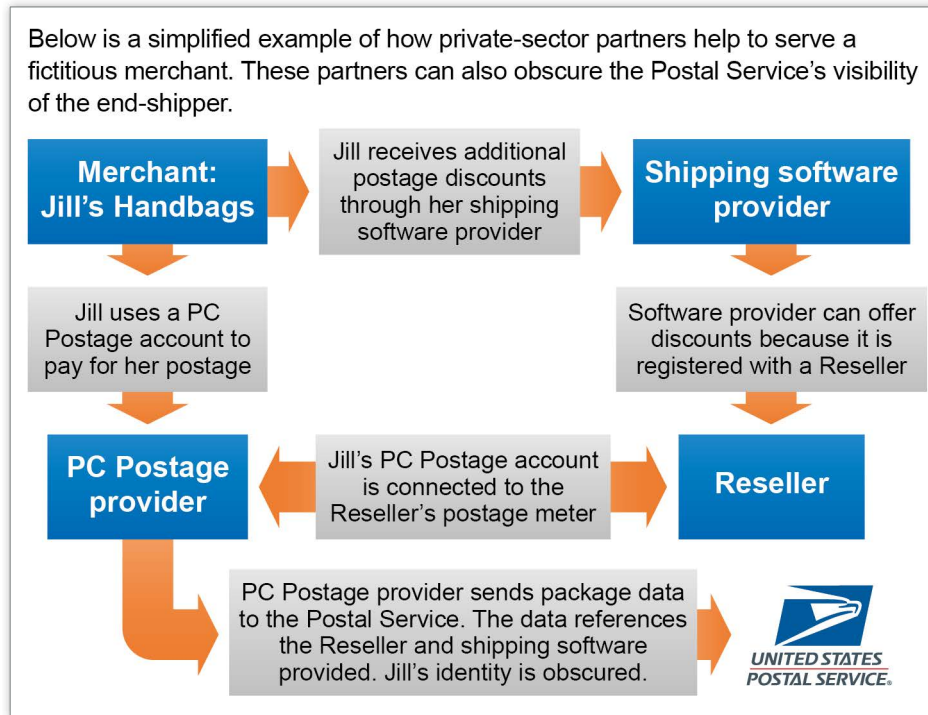
While the rapidly-growing ecommerce space is dominated by a handful of large online retailers, there are also thousands of smaller merchants that sell goods online and need to ship their items to consumers. To reach these smaller merchants, the Postal Service works with a variety of private sector partners. These partners, or "middlemen," include PC Postage providers, Resellers, online marketplaces, shipping software providers, and ecommerce platforms, which the Postal Service collectively refers to as Channel Partners. This management alert will focus primarily on PC Postage providers and Resellers.

The Postal Service has authorized three PC Postage providers to facilitate online payment and printing of postage — via virtual postage meters — for Postal Service customers. Virtual postage meters, as opposed to physical postage meters, allow PC Postage providers to digitally link customers to specific postage rates and allow customers to print labels electronically. PC Postage providers also provide the back-end software integration that allows merchants to use the Postal Service as a shipping option on various online platforms. About \$9.8 billion in revenue flowed through PC Postage in fiscal year (FY) 2021.

There are five Resellers that act as outsourced sales partners for the Postal Service. Resellers can pursue two different types of businesses. First, they can target small-and medium-sized merchants that the Postal Service may not have the resources to pursue directly. Resellers offer those merchants postage discounts that they could not get on their own, because they may not send enough packages to qualify. Merchants accounted for about [REDACTED] of Resellers' volume in FY 2021. In addition to the merchants, Resellers also target other middlemen, including shipping software providers and online marketplaces. In fact, most shipping software providers and online marketplaces that offer Postal Service shipping work through Resellers, rather than having direct agreements with the Postal Service. Resellers have Negotiated Service Agreements (NSA) that detail their relationship with the Postal Service, including the different categories of shippers they can serve (small, medium, and large merchants and other middlemen), the rates that they can offer those shippers, and the discount the Reseller can earn for each of those categories. About [REDACTED] in postage flowed through Resellers in FY 2021.

PC Postage providers and Resellers often work together to serve the same shippers and their various needs. In FY 2021, more than [REDACTED] of Reseller volume flowed through PC Postage providers. The chart in [Figure 1](#) provides an example of how Channel Partners and merchants work together to ship a mailpiece and how the end customer's identity is not always visible to the Postal Service.

Figure 1. Example of Channel Partner Relationships and Roles



Note: The additional discount Jill receives from the shipping software provider is an upgrade from Commercial Base Pricing to Commercial Plus Pricing, which includes cubic pricing.
Source: OIG-created based on Channel Partner relationships.

Prior OIG Work and Current Channel Partner Landscape

The OIG previously reported on the Postal Service's relationships with Channel Partners.¹ At a high level, these reports explained how the Postal Service's management of these partnerships had not kept pace with their growth in size, importance, and complexity; and summarized the associated harm to the Postal Service. The OIG made 11 recommendations to the Postal Service in those reports. To respond to the recommendations, in part, the Postal Service established a formal Channel Partner strategy, updated Resellers' agreements, developed internal policies and processes, and restructured internal departments

¹ Those OIG reports included *Postal Partnerships: The Complex Role of Middlemen and Discounts in the USPS Package Business* (RARC-WP-18-010), *Assessing the Effectiveness of Competitive Negotiated Service Agreements* (RARC-WP-19-004), and *The Postal Service and the Evolution of PC Postage* (RARC-WP-19-005).

responsible for Channel Partners in this rapidly evolving ecommerce environment. The Postal Service's goals included gaining customer visibility and Channel Partner oversight, fostering direct relationships with merchants, and preventing unnecessary price erosion (the increased prevalence of steep discounts) and Channel Partner arbitrage (e.g., partners profiting by placing existing Postal Service customers onto their platforms).

In July 2022, the Postal Service notified Resellers of its decision to terminate the Resellers' contracts, effective September 30, 2022. Specifically, the Postal Service cited that its relationship with Resellers was not resulting in the benefits and efficiencies that it had originally envisioned and had caused difficulties in monitoring compliance with pricing and other terms. The Postal Service anticipates that the software platforms and online marketplaces that work through Resellers could transition to the USPS Connect eCommerce program, which was announced in May 2022. Even with the cancellation of the Reseller contracts, we believe that enhancements to the internal control environment, as detailed below, will be relevant to the entire ecosystem and critical as the Postal Service navigates its direct relationships with additional Channel Partners.

Finding #1: Weaknesses in Channel Partner Programs

Weaknesses in the design and oversight of Channel Partner programs have resulted in significant revenue risk for the Postal Service during FYs 2020 and 2021. This occurred as package volume share migrated from higher-priced commercial tiers to Channel Partners with steeper discounts. Specifically, we noted:

- At least one PC Postage provider systematically routed merchants to Channel Partner postage meters, even if the merchant did not have a relationship with the Channel Partner. This significantly reduced the Postal Service's revenue from those merchants and inhibited the merchants' ability to have a direct relationship with the Postal Service.

- The Postal Service did not adequately enforce requirements in the Reseller contracts, leading to a lack of visibility of the merchants, shipping software providers, and online marketplaces whose packages flow through Resellers.
- The Postal Service’s methodology for identifying and collecting incorrectly discounted postage from Resellers, known as the chargeback process, was incomplete and inaccurate.

Exploitation of Channel Partner Meters

We noted that some merchants had their packages routed to Channel Partner postage meters without the merchants’ awareness.

We examined this issue and found compelling evidence that at least one PC Postage provider was systematically routing merchants’ packages through Channel Partners, even if the merchants did not have a relationship with the Channel Partner receiving their volume.

This practice significantly reduced the Postal Service’s revenue. When a PC Postage provider routes a merchant’s packages through a Channel Partner, the Channel Partner keeps a percentage of the merchant’s postage payments before passing the remainder onto the Postal Service. This practice can reduce the Postal Service’s revenue from the merchant by up to [REDACTED].²

Further, when a merchant’s volume is routed to a Channel Partner meter, it inhibits the merchant’s ability to have a direct relationship with the Postal Service. This is because the Postal Service can no longer see the merchant’s shipments, which are, instead, attributed to the Channel Partner. If the merchant has an existing agreement with the Postal Service that requires the merchant to ship a minimum number of packages, the merchant will appear to be in violation of that requirement if its volume is suddenly attributed to a Channel Partner. In the cases we reviewed, merchants in this situation expressed frustration at the disruptions and, in one case, the merchant discontinued its contractual relationship with the Postal Service. In addition, merchants may be unable to secure a direct agreement with the Postal Service in the future (e.g., for customized packaging),

because they will be unable to demonstrate that they ship enough Postal Service packages to qualify.

Postal Service policy³ does not include guardrails for the transfer of merchants from their own individual postage meter to postage meters assigned to Channel Partners. Specific policy language prohibiting inappropriate transfer of merchants to Channel Partner meters would significantly enhance the integrity of the Channel Partner program and reduce the risk of revenue loss for the Postal Service.

Inadequate Enforcement of Reseller Contracts

Reseller contracts include requirements that the Postal Service did not enforce. One of these was that the Reseller identify the merchants, shipping software providers, and online marketplaces whose packages flow through the Reseller, so the Postal Service could tie a package back to the entity that sent it. The Resellers were unable to reliably supply this information, creating uncertainty as to whether the [REDACTED] packages flowing through Resellers in FY 2020 and FY 2021 came through at the correct discount levels, or whether they should have received any discount at all. Nonetheless, the Postal Service accepted the Reseller volume.

Inaccurate Chargebacks

The Postal Service developed processes to attempt to determine which packages came through at the wrong discount levels, calculated the additional amount the Resellers owed, and invoiced them for the postage due. These invoices were referred to as “chargebacks.” We examined the Postal Service’s methodology for calculating chargebacks and found it to be incomplete and inaccurate. While the Postal Service made some improvements to its chargeback processes in FY 2022, there were still material deficiencies. For example, we determined that the Postal Service was not evaluating all mail classes, used incorrect postage rates in calculating chargebacks, and did not construct its analysis in a way that could be recreated (e.g., audited). These errors were caused by a lack of internal controls, including the absence of a formal process for calculating

2 [REDACTED]

3 Requirements for PC Postage are in Postal Service regulations (39 C.F.R. §501) as well as a collection of policy documents called the Intelligent Mail Indicia Performance Criteria.

chargebacks and the lack of quality assurance for the analysis. This resulted in the Postal Service significantly understating the chargebacks. Due to the way the Postal Service conducted the analysis and maintained its records, we could not determine the specific amount by which the chargebacks were off. As processes are corrected, the Postal Service should conduct additional analyses to determine the total revenue due from partners and take appropriate action.

Impact

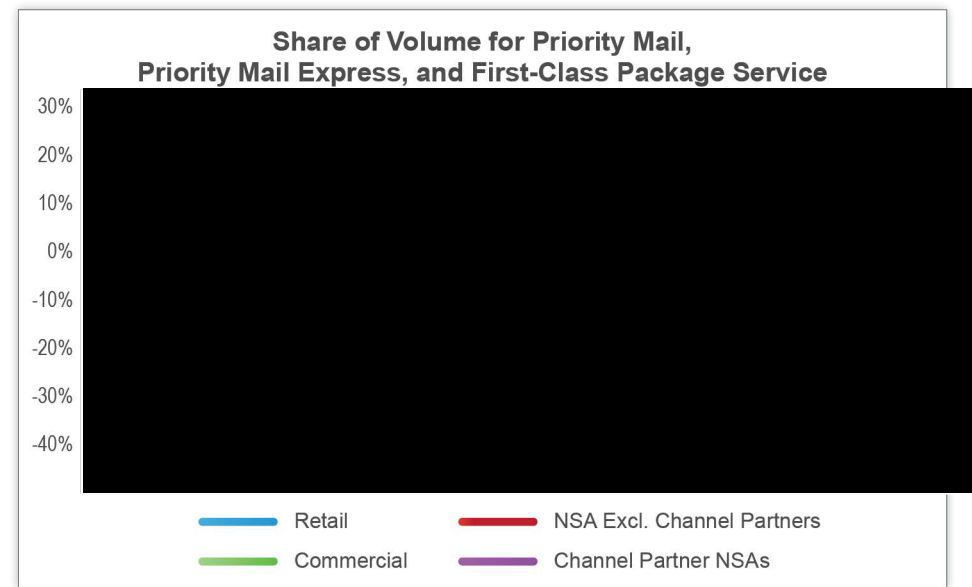
The Postal Service took steps to address challenges with Channel Partners in 2016 and formalized its strategy beginning in 2019. The written goals of the Channel Partner strategy included preventing unnecessary price erosion and removing arbitrage opportunities for Channel Partners. These strategic reforms were, in part, in response to previous OIG reports showing a significant shift in volume from higher-priced tiers to lower-priced tiers that Channel Partners controlled.

However, between FY 2016 and FY 2021, the share of the Postal Service's volume flowing to each price tier continued to shift significantly toward lower-priced tiers. Specifically, the share of volume flowing through Channel Partners with NSAs ██████████ percentage points between FYs 2016 and 2021.⁴

At the same time, the share of volume going through commercial channels ██████████ percentage points.

As shown in Figure 2, there was a marked relationship between the decline in volume share going to commercial channels and the ██████████ share going to Channel Partner NSAs — particularly in FYs 2020 and 2021.

Figure 2: Volume Shift FY 2016-FY 2021.



Source: OIG analysis of Postal Service volume data.

While we recognize a portion of the volume shift was the result of the COVID-19 pandemic as well as other economic and market driven factors, we believe that the systematic movement of customers from their own commercial meters to Channel Partner meters was also a significant contributor to this shift. However, we cannot specify the amount due to the lack visibility of end shippers that flowed through Channel Partners. Given the rapid growth in the ecommerce shipping marketplace, it is imperative that the Postal Service have strong internal controls and reliable end-shipper visibility.

PRICING ILLUSTRATION

How much does the Postal Service get paid to deliver a two pound Priority Mail package from Chicago to Washington, DC? It depends. If the customer paid for their shipment at a post office window, they would pay the retail rate of \$10.70 and the Postal Service would receive all of those funds. If the customer used a PC Postage account to pay for the package, they would pay the commercial rate of \$8.49 and the Postal Service would receive the full amount. If that same customer worked through a Channel Partner (e.g., a Reseller or shipping software provider) NSA, the customer would still pay the commercial rate of \$8.49, but the Postal Service would receive roughly ██████████ after paying the Channel Partner its cut.

⁴ For NSAs with at least 1 million pieces and for the following mail products: Priority Mail, Priority Mail Express, and First-Class Package Service.

Looking Forward

Management stated it intends to enter into direct agreements with partners, including an estimated 400-500 partners that previously worked through the Resellers. Considering the announced termination of these contracts and the initiation of more direct relationships with partners through the Connect eCommerce program, it is critical to ensure that internal controls are in place to prevent and detect price erosion and Channel Partner arbitrage in the future.

Recommendation #1

We recommend the **Vice President, Product Solutions**, modify Postal Service policy on PC Postage to include parameters surrounding the transfer of merchants to Channel Partner meters.

Recommendation #2

We recommend the **Vice President, Business Development**, enhance and implement internal controls that provide the Postal Service with visibility into merchant activity on Channel Partner meters.

Recommendation #3

We recommend the **Vice President, Business Development**, develop mechanisms to directly identify the end shipper for each package and enforce non-compliance.

Recommendation #4

We recommend the **Vice President, Business Development**, in coordination with the **Senior Vice President, Finance and Strategy**: (1) develop and formalize a technical process, which includes the detailed calculation of all chargeback opportunities for Channel Partners and a quality assurance process, and (2) consider retroactively calculating and invoicing Resellers for the correct chargeback amounts for previous periods.

Recommendation #5

We recommend the **Vice President, Business Development**, develop mechanisms to identify trends and risks in the composition of price tiers.

Management's Comments

Management partially agreed with Finding 1 and agreed with Recommendations 1 through 3. Management disagreed with Recommendations 4 and 5. Management stated that the OIG's report should not be issued as a management alert, because of actions the Postal Service had in progress prior to this report's issuance, and the commercial sensitivity of the material. The Postal Service also reiterated how its Channel Partner strategy has evolved over time. Management disagreed that they did not adequately enforce requirements in the Reseller program. Management also disagreed that the chargeback process was inaccurate and incomplete, stating they did not view the process as wholly inaccurate and incomplete.

Regarding recommendation 1, management stated they will evaluate and update current PC Postage policies to ensure that better controls are in place to prohibit the transfer of merchants to Channel Partner meters. The target implementation date is June 30, 2023.

Regarding recommendations 2 and 3, management stated they terminated the Reseller program (effective September 30, 2022) and are implementing the Connect eCommerce program with contractual modifications to enable pricing flexibility. The target implementation date was September 30, 2022, coinciding with the termination of the Reseller program.

Regarding recommendation 4, management stated they did not see a need to develop and formalize a technical chargeback process due to the termination of the Reseller program. Management has chosen to forgo retroactively invoicing Resellers for correct chargeback amounts for previous periods.

Regarding recommendation 5, management stated they did not see a need to develop mechanisms to identify trends and risks in the composition of price tiers as the Reseller program is being terminated and there will no longer be Reseller pricing tiers.

See [Appendix B](#) for management's comments in their entirety.

Evaluation of Management's Comments

The OIG considers management's comments responsive to recommendation 1 and non-responsive to recommendations 2 through 5. The corrective actions for recommendation 1 should resolve the issue identified in the report.

Regarding management's disagreement with our assessment of the inaccuracy of the chargeback process, OIG has provided management with documentation detailing the inaccuracy of chargeback calculations. While management stated it has collected \$900,000 from Resellers and identified an additional \$2.4 million in potential chargebacks, we noted that these amounts are inaccurate. Specifically, the chargebacks did not use the correct postage rates, did not evaluate all mail classes, and did not construct the analysis in a way that it could be recreated, as identified in our report. Further, in subsequent conversations, the Postal Service confirmed it has not invoiced Resellers for chargebacks since FY 2021, and does not intend to collect outstanding chargebacks from Resellers.

Regarding recommendations 2 through 4, while we understand management has terminated the Reseller program, the OIG identified that deficiencies existed within the control environment surrounding Channel Partners related to end-shipper visibility, which remain even with the cancellation of the Reseller program. As such, there remains a need to develop controls to enhance end-shipper visibility. As the Postal Service seeks to establish direct agreements with

hundreds of platforms, those new agreements are expected to require registration of the merchants shipping through each platform, similar to the requirement under the Reseller agreements. In the likely event that challenges with end-shipper visibility continue under the new agreements due to the reliance on PC Postage providers for customer identifying information, the Postal Service may need a chargeback process to enforce the end-customer visibility requirements. That process should include robust quality controls.

Regarding recommendation 5, we continue to believe that a mechanism to identify trends and risks in the composition of price tiers (retail, commercial, etc.) would benefit the Postal Service as it navigates this ecosystem. We will continue to evaluate this as part of the OIG's broader audit on Channel Partners and will not pursue this recommendation through the formal audit resolution process.

All recommendations require OIG concurrence before closure. We view the responses to recommendations 2, 3, 4, and 5 as non-responsive. We consider recommendation 5 closed, not implemented, with the issuance of this report. We will pursue recommendations 2, 3, and 4 through the formal resolution process. The OIG requests written confirmation when corrective actions are completed for all recommendations. 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.

Appendix A: Additional Information

Scope and Methodology

The objective is to provide Postal Service officials immediate notification of the issues identified during our ongoing audit (Channel Partner Visibility and Compliance, Project Number 22-069).

To accomplish our objective, we:

- Reviewed and analyzed transactions in the Marketing Operational Data Store and the Enterprise Data Warehouse for FY 2021.
- Reviewed Resellers' agreements, PC Postage Providers' Package Business Incentive agreements, and other Postal Service strategy documents.
- Reviewed federal regulations and technical guidelines outlined in the IMI-PC.
- Reviewed sales records in Panorama.
- Analyzed the Postal Service's computer programs and processes used to assess chargebacks.
- Interviewed Postal Service sales representatives, managers, and executives.

We conducted this performance audit from June through October 2022 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.

We notified management of the identified issues prior to the draft of this management alert. We discussed our observations and conclusions with management on September 8, 2022, and included their comments where appropriate.

We assessed the reliability of computer-generated data from the Postal Service's Marketing Operational Data Store and Enterprise Data Warehouse by reviewing the data and interviewing Postal Service officials. We determined that the data were sufficiently reliable for the purposes of this report.

Prior Audit Coverage

Report Title	Objective	Report Number	Final Report Date	Monetary Impact
<i>The Postal Service and the Evolution of PC Postage</i>	Explain the history of PC Postage and assess the program's challenges and effectiveness.	RARC-WP-19-005	6/3/2019	None
<i>Postal Partnerships: The Complex Role of Middlemen and Discounts in the USPS Package Business</i>	Explore the Postal Service's use of partners and discounts in its package business and identify opportunities for improvement.	RARC-WP-18-010	7/23/2018	\$3.6 billion
<i>Assessing the Effectiveness of Domestic Competitive Negotiated Service Agreements</i>	To assess the processes surrounding NSAs and the effectiveness of the agreements.	RARC-WP-19-004	5/3/2019	None

Additional information or recommendations regarding the issues addressed in this Management Alert may also be included in the final report resulting from our related ongoing audit.

Appendix B: Management's Comments



September 29, 2022

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Key Issues with Channel Partners
(Project Number 22-069-1-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft audit report, *Key Issues with Channel Partners*.

USPS disagrees that this report be released as a Management Alert. Management applied learnings from and had already executed channel partner changes prior to the issuance of this report, therefore alert to management was not needed. Additionally, the Management Alert is written with references to channels partners, PC Postage providers and resellers without making proper distinctions. As this is a highly complex ecosystem, the Management Alert may create confusion for the stakeholders reviewing the report resulting in disruption in a highly competitive market. The Management Alert is silent on the substantive changes made to the reseller program beginning January 2020. The 2020 reseller program ensured reseller consistency, merchant visibility and accountability.

As a result of the new reseller contract structure, USPS was able to identify additional ways to improve upon the channel strategy. USPS is currently executing changes to our channel strategy to remove layers between USPS and merchants. As competitors began to pursue small and mid-size merchants through platforms, USPS channel strategy needed to evolve to effectively compete. Under the 2020 strategy, the USPS did not offer competitive pricing to merchants on platforms and was unable to effectively compete as competitors were able to dynamically adjust price on these platforms. With the launch of the Connect eCommerce program, USPS will have more direct relationships with platforms and merchants. Additionally, because of the fast-paced, changing market conditions outlined above, it was determined necessary to terminate the reseller program and empower the USPS Business Development and Sales team to develop direct relationships with platforms and merchants. Per the provisions in the reseller contracts, a termination notice was issued to all domestic resellers on June 30, 2022, with an effective contract termination date of September 30, 2022.

Finding #1: At least one PC Postage provider routed merchants to channel partner meters.
Response: USPS agrees that in some cases, resellers switched merchants' meters to receive spread unbeknownst to the merchant. USPS agrees this practice reduced the visibility or direct relationship between USPS and the merchant.

Finding #2: The Postal Service did not adequately enforce requirements in the reseller program leading to a lack of visibility in the reseller program.
Response: Management disagrees that USPS did not adequately enforce requirements in the reseller program. In fact, since the effective date of the contracts, USPS did collect \$900,000 in chargebacks from resellers due to inaccurate or lack of merchant information.

Finding #3: The Postal Service's chargeback methodology process was incomplete and inaccurate.

Response: Management disagrees that the process was wholly inaccurate and incomplete. In fact, management did collect \$900,000 in chargebacks from the resellers since the contract effective date. In June of 2022, USPS did identify a calculation error within the chargeback process and identified an additional \$2.4M in chargebacks that USPS could recoup. Due to the termination of the reseller agreements effective September 30, 2022, USPS made a business decision to forgo these additional chargebacks.

Recommendation [1]:

We recommend the Vice President, Product Solutions, modify Postal Service policy on PC Postage to include parameters surrounding the transfer of merchants to Channel Partner meters.

Management Response/Action Plan:

Management agrees with this recommendation. Current PC Postage policies will be evaluated and updated to ensure better controls are in place to prohibit the transfer of merchants to channel partner meters without merchant knowledge and consent and prior notification to USPS.

Target Implementation Date: 6/30/2023

Responsible Official:

Director of Commercial Product Payment & Policy

Recommendation [2]:

We recommend the Vice President, Business Development, enhance and implement internal controls that provide the Postal Service with visibility into merchant activity on Channel Partner meters.

Management Response/Action Plan:

Management agrees with this recommendation. To achieve direct relationships with platforms and merchants, USPS launched Connect eCommerce in May of 2022, implemented contractual modifications to enable pricing flexibility to merchants on existing direct platform agreements, and terminated the reseller program effective September 30, 2022.

Target Implementation Date: 09/30/2022

Responsible Official:

Vice President, Business Development

Recommendation [3]:

We recommend the Vice President, Business Development, develop mechanisms to directly identify the end shipper for each package and enforce non-compliance.

Management Response/Action Plan:

Management agrees with this recommendation. Please see the response to Recommendation #2.

Target Implementation Date: 09/30/2022

Responsible Official:

Vice President, Business Development

Recommendation [4]:

We recommend the Vice President, Business Development, in coordination with the Senior Vice President, Finance and Strategy: (1) develop and formalize a technical process, which includes the detailed calculation of all chargeback opportunities for Channel Partners and a quality assurance process, and (2) consider retroactively calculating and invoicing Resellers for the correct chargeback amounts for previous periods.

Management Response/Action Plan:

Management disagrees with this recommendation. We do not see the need to develop such a process currently. Termination notice of the reseller program was issued June 30, 2022, effective September 30, 2022. USPS has made a business decision to forgo retroactively invoicing Resellers for correct chargeback amounts for previous periods.

Target Implementation Date: N/A

Responsible Official:

N/A

Recommendation [5]:

We recommend the Vice President, Business Development, develop mechanisms to identify trends and risks in the composition of price tiers.

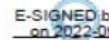
Management Response/Action Plan:

Management disagrees with this recommendation. As the reseller program is being terminated effective September 30, 2022, there will no longer be reseller pricing tiers.


Target Implementation Date: N/A

Responsible Official:

N/A

 E-SIGNED by Shibani S Gambhir
on 2022-09-29 12:47:49 CDT

Shibani Gambhir
Vice President, Business Development

 E-SIGNED by Thomas J Foti
on 2022-09-29 14:53:03 CDT

Thomas Foti
Vice President, Product Solutions

cc: *Manager, Corporate Audit Response Management*

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