OFFICE OF
INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

Mail Collection Box — Management of Service Status

Audit Report

**Report Number
DR-AR-17-009**

September 8, 2017

Highlights

Background

Mail collection boxes, introduced in 1858, are used primarily to collect mail from customers. Nationwide, there were about 153,000 collection boxes at the end of fiscal year (FY) 2016; however, the U.S. Postal Service has been removing underused boxes, with about 14,000 boxes removed over the past five years. Postal Service policy requires approval by the Area and public notification in order to permanently remove a collection box.

Each district is required to enter all collection boxes in the Collection Point Management System (CPMS), a database that includes the details of collection points such as the addresses, location types (e.g., Business, Residential, Post Office Lobby), and the days and times the collection point is accessed.

The CPMS is a major source of information for management review and analysis of trends affecting collection boxes. If a collection box is temporarily unable to be collected from, a local request is made to the CPMS district administrator for the box to be placed into an out-of-service status in the system. The Postal Service allows collection boxes to be placed in an out-of-service status temporarily if they are damaged and awaiting repair, removed for a parade, or cannot be collected due to unusual circumstances. While there is no policy governing the use of the out-of-service status, according to Postal Service Headquarters, collection boxes placed in out-of-service status should be for a temporary time period.

Our objective was to assess the Postal Service's processes for managing out-of-service mail collection boxes in the Great Lakes, Northeast, Pacific, Southern, and Western Areas. We reviewed out-of-service collection boxes in previous audit projects for the Eastern and Capital Metro areas. As of March 31, 2017, 3,221 collection boxes were in an out-of-service status greater than seven days for the five Postal Service areas. These collection boxes were in this status from as low as an average of 223 days to a high of 817 days.

What the OIG Found

The Postal Service did not always effectively manage out-of-service mail collection boxes. Our analysis of 205 statistically sampled boxes showed that 113 (55 percent) were permanently removed from the street without area approval and 102 of those (50 percent) were removed without public notification. Also, 515 employees in the five areas of operations had CPMS district level administrative privileges, which allowed them to place a box in an out-of-service status. Postal Service area management stated that generally one to three staff with this access level are sufficient to perform necessary duties. Area management indicated, of the 515 employees with administrative privileges, only 320 should continue to have access.

Additionally, while there is no policy on reporting out-of-service status, CPMS users have the ability to see reports on out-of-service boxes. However, they do not have the ability to see the

date boxes were placed out-of-service or the duration they were in that status in order to monitor how long they have been out-of-service.

These conditions occurred because the Postal Service did not have policies or procedures to clearly define the purpose, appropriate use, duration, approval requirements, and need for notification to the public for out-of-service boxes. Also, managers did not perform system access privileges reviews to determine if CPMS access rights were current or appropriate. Additionally, the CPMS did not have business intelligence reports for management to more effectively, monitor, track, and manage out-of-service mail collection boxes, where appropriate.

Without clearly defined policy and procedures, the management of out-of-service boxes will not be consistently applied which may negatively impact management decisions and service to the public.

What the OIG Recommended

We recommended management establish national policies or procedures for out-of-service collection boxes to ensure consistent use, duration, and approval levels. We also recommended management communicate to managers the importance of periodic reviews of employee access levels to CPMS, and modify the system to add adequate reporting, tracking tools, and system controls.

Transmittal Letter

OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

September 8, 2017

MEMORANDUM FOR: KEVIN MCADAMS
VICE PRESIDENT, DELIVERY OPERATIONS

JEFFREY C. JOHNSON
VICE PRESIDENT, INFORMATION TECHNOLOGY

E-Signed by Janet Sorensen
ERIFY authenticity with eSign Deskt̄

FROM: Janet M. Sorensen
Deputy Assistant Inspector General
 for Retail, Delivery, & Marketing

SUBJECT: Audit Report – Mail Collection Box – Management of Service
Status (Report Number DR-AR-17-009)

This report presents the results of our audit of the Mail Collection Box – Management of
Service Status (Project Number 17RG007DR001).

We appreciate the cooperation and courtesies provided by your staff. If you have any
questions or need additional information, please contact Rita F. Oliver, director, Delivery,
or me at 703-248-2100.

Attachment

cc: Vice Presidents, Area Operations
    Corporate Audit Response Management

Table of Contents

Findings

Our objective was to assess the Postal Service's processes for managing out-of-service mail collection boxes in the Great Lakes, Northeast, Pacific, Southern, and Western areas.

Introduction

This report presents the results of our self-initiated audit of the Mail Collection Box Management of Service Status (Project Number 17RG007DR001). Our objective was to assess the Postal Service's processes for managing out-of-service mail collection boxes in the Great Lakes, Northeast, Pacific, Southern, and Western areas. We reviewed out-of-service collection boxes in previous audit projects for the Eastern and Capital Metro areas.

Mail collection boxes, introduced in 1858, are used primarily to collect mail from customers. Nationwide, there were about 153,000 collection boxes at the end of fiscal year (FY) 2016; however, the U.S. Postal Service has been removing underused boxes, with about 14,000 boxes removed over the past five years. Postal Service policy requires Area approval and public notification prior to permanently removing a collection box. Collection points are locations where customers drops off mail for collection by the Postal Service. Each district is required to enter all collection boxes in the Collection Point Management System (CPMS), a database that includes the details of collection points such as the addresses, location types (e.g., Business, Residential, Post Office Lobby), and the days and times the collection point is accessed.

CPMS is a major source of information for management review and analysis of trends affecting collection boxes. If a collection box is temporarily unable to be collected from, a local request is made to the CPMS district administrator for the box to be placed into an out-of-service status in the system. The Postal Service allows collection boxes to be placed in an out-of-service status temporarily if they are damaged and awaiting repair, removed for a parade, or cannot be collected due to unusual circumstances. While there is no policy governing the use of the out-of-service status, according to Postal Service Headquarters, collection boxes placed in out-of-service status should be for a temporary time period. Our analysis of CPMS data as of March 31, 2017, for the five areas of operations, showed 3,221 collection boxes in an out-of-service status greater than seven days. Specifically, collection boxes were in this status from as low as, an average of 223 days to a high of 817 days for the areas (see Table 1). Please see Appendix A for additional background information.

Table 1. Out-of-Service Collection Boxes

AREA	TOTAL COLLECTION BOXES OUT-OF-SERVICE MORE THAN A WEEK	AVERAGE DURATION COLLECTION BOXES WERE OUT-OF-SERVICE (IN DAYS)
GREAT LAKES	510	774
NORTHEAST	966	817
PACIFIC	1,091	462
SOUTHERN	175	223
WESTERN	479	306
TOTAL	**3,221**	**582**

Source: The U.S. Postal Service Office of Inspector General (OIG) analysis of CPMS "out-of-service data", as of March 31, 2017.

Summary

The Postal Service does not effectively manage out-of-service mail collection boxes. Our analysis of 205 statistically sampled boxes showed that 113 (55 percent) were permanently removed from the street without area approval and 102 of those (50 percent) were removed without public notification. Also, 515 employees in the five areas of operations had CPMS district level administrative privileges, which allowed them to place a box in an out-of-service status. Postal Service area management indicated generally one district lead and two district backup persons with this access level are sufficient to perform necessary duties. Area management indicated, of the 515 employees with administrative privileges, only 320 should continue to have access. Additionally, while there is no policy on reporting out-of-service status, CPMS users have the ability to see reports on out-of-service boxes. However, they do not have the ability to see the date boxes were placed in out-of-service or the duration they were in that status in order to monitor how long they have been out-of-service.

These conditions occurred because the Postal Service did not have policies or procedures to clearly define the purpose, appropriate use, duration, approval requirements, and need for notification to the public for collection boxes placed in an out-of-service status. Further, managers did not perform system access privileges reviews to determine if CPMS access rights were current or appropriate. Additionally, the CPMS did not have business intelligence reports for management to more effectively, monitor, track, and manage out-of-service mail collection boxes, where appropriate.

Without clearly defined policy and procedures, the management of out-of-service boxes will not be consistently applied which may negatively impact management decisions to ensure proper availability for collection boxes to provide service to the public.

The Postal Service did not always manage out-of-service mail collection boxes.

Management of Out-of-Service Collection Boxes

The Postal Service did not always manage out-of-service mail collection boxes. We statistically sampled 205 of the 3,221 out-of-service boxes for review in the five areas of operations. Based on data analysis and discussions with the responsible management officials, we determined, 113 (55 percent) boxes were permanently removed from the street without area approval, and 102 of the 113 boxes were removed without public notification[1] (see Table 2).

Table 2. OIG Analysis of Out-of-Service Collection Boxes

Area	Statistical Sample by Area	Permanently Removed From the Street	No Area Approval for Permanent Removal	Public Notification Not Provided Prior to Removal
Great Lakes	33	8	8	7
Northeast	60	41	41	39
Pacific	68	46	46	43
Southern	13	5	5	1
Western	31	13	13	12
Total	**205**	**113**	**113**	**102**

Source: OIG analysis of CPMS "out-of-service data", as of March 31, 2017.

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1 Public Notification not applicable for 11 collection boxes (one box in Great Lakes, two boxes in Northeast, three boxes in Pacific, four boxes in Southern, and one box in the Western areas) because there were multiple boxes at the same location.

Area management provided their original justification for placing these boxes in out-of-service based on our inquiries. Specifically, boxes in out-of-service included 78 for damage, 56 due to nearby construction, five because the property owner requested the box to be removed, and 66 for other reasons. Other reasons include: the box was stolen; the box was to be relocated; and the box was seasonally inaccessible during the winter in a national park (see Table 3).

Table 3. OIG Analysis of Rationale for Placing Collection Boxes Out-of-Service

| Area | Sample | Rationale for Placing Collection Boxes Out-of-Service | | | |
		Damage	Nearby Construction	Property Owner Request	Other Reason
Great Lakes	33	6	8	1	18
Northeast	60	18	29	0	13
Pacific	68	37	7	3	21
Southern	13	6	5	0	2
Western	31	11	7	1	12
Total	**205**	**78**	**56**	**5**	**66**

Source: OIG analysis of CPMS "out-of-service data", as of March 31, 2017.

As a result of our audit, management implemented or planned corrective actions for 70 of the 205 out-of-service boxes to be placed back on the street and/or returned to service in the CPMS. Also, of the 70 collection boxes, 19 were CPMS status errors only, which means mail was being collected from the boxes but the box showed as out-of-service (see Table 4).

Table 4. Corrective Action Taken on Sample Out-of-Service Collection Boxes

Area	Statistical Sample Provided to Each Area	Placed Back on the Street and/or Returned to Service
Great Lakes	33	20
Northeast	60	8
Pacific	68	22
Southern	13	4
Western	31	16
Total	**205**	**70**

Source: OIG analysis of CPMS "out-of-service data", as of March 31, 2017.

We also identified 515 employees with District Administrative (DA) privileges in the CPMS, which allows employees to place a collection box in an out-of-service status. Employee access to the CPMS is managed through eAccess.[2] Employees should not maintain access when there are changes in job responsibilities, transfers, or terminations.[3] During our fieldwork, management

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2   eAccess is the portal for requesting applications and resources in the Postal Service.
3   Postal Service policies require managers to periodically review employee access levels to Postal Service Information Systems. In addition, managers must ensure access is revoked for personnel who no longer require access due to changes in job responsibilities, transfers, or termination.

made revisions to the number of personnel authorized to have DA privileges because of changes in job, transfers, or terminations. Area management indicated, of the 515 employees with DA privileges, only 320 should continue to have access (see Table 5). (See Appendix B for district information).

Table 5. Area Summary Administrative Access Privileges in CPMS

Area	District Administrative Access Privileges	Revised District Administrative Access
Great Lakes	92	62
Northeast	99	74
Pacific	102	66
Southern	144	89
Western	78	29
Total	**515**	**320**

Source: OIG analysis of CPMS DA Users, as of May 3, 2017.

Under the information technology, principle of least privilege[4] and discussions with Postal Service area management, generally one district lead and two district backup persons with this access level are sufficient to perform necessary duties.

Additionally, while CPMS users have the ability to see reports on out-of-service boxes, they do not have the ability to see specific data on these boxes. CPMS users cannot see the date boxes were placed in out-of-service or the duration of that status in order to monitor how long they have been out-of-service.

These conditions occurred for the following reasons:

- The Postal Service did not have policies or procedures to clearly define the purpose, appropriate use, duration, approval requirements, and need for notification to the public for collection boxes placed in an out-of-service status. While Postal Service policy sets forth procedures for collection box removals, it does not for procedures related to out-of-service status.

- Managers did not perform system access privileges reviews to determine if CPMS access rights were current or appropriate. Such reviews are required under policy for managers to periodically review employee access levels to Postal Service Information Systems and to ensure access is revoked for personnel who no longer require access due to changes in job responsibilities, transfers, or termination.

- The CPMS does not have business intelligence reports for management to more effectively, monitor, track, and manage out-of-service mail collection boxes, where appropriate. Specifically, CPMS reporting and tracking tools and system controls had not been created to assist management with overseeing the status of collection boxes placed out-of-service. Postal Service area management stated that the CPMS lacks a report to identify collection boxes that have been out-of-service for an extended period of time. In addition, we were unable to identify sufficient system controls to ensure boxes placed out-of-service longer

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4   *Handbook AS-805-Information Security, November 2016, 9-3.1.4 defines "least privilege" as* providing personnel with the minimum level of information resources and system functionality needed to perform their duties.

than appropriate could be identified and flagged, or a requirement for an estimated return to service date, limiting the length of time a box could be out-of-service before it must be approved and/or removed.

Without clearly defined policy and procedures for managing out-of-service boxes and management reports, the management of out-of-service boxes will not be consistently applied and may negatively impact management decisions to ensure proper availability for collection boxes to provide service to the public.

Management Corrective Actions

Postal Service Headquarters management informed the OIG in June 2017, they initiated actions to correct some issues identified in this report.

Specifically, headquarters:

- Instructed all areas of operations to conduct a review to either provide (1) a return to service date for out-of-service boxes or (2) justify the reason the out-of-service box is identified for removal and is complying with the policy in the POM 9.[5]

- Initiated steps to develop a comprehensive collection box Standard Operating Procedure (SOP) that will address the use of the out-of-service status. Management stated after the SOP is reviewed, they anticipate implementation by the end of July 2017.

Also, management stated they recognized the CPMS needs enhancements to properly track and monitor out-of-service status. Management is working to develop a business needs statement and has requested initial funding for FY 2018 to develop enhancements to the system. These enhancements will include:

- Adding a history table that has the ability to identify when and who placed a box in out-of-service.

- Providing user capabilities to include comments for box records.

- Creating an out-of-service page that would list all out-of-service boxes for the district, including area approval dates and expiration dates.

- Adding a requirement to input a return to service date with and dropdown box listing the 10 exception reasons listed in the POM 9 or the action being taken in the CPMS, which will guide subsequent activity in the collection box records.

Postal Service Headquarters management informed the OIG they initiated actions to correct some issues identified in this report.

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[5] *Postal Operations Manual, Issue 9, July 2002, updated with Postal Bulletin revisions through December 24, 2015, Chapter 3, Collection Service-National Service Standards,* December 24, 2015.

Recommendations

We recommend management establish national policies or procedures for out-of-service collection boxes, communicate to managers the importance of periodic reviews of employee access levels to CPMS, and modify the CPMS to add adequate reporting, tracking tools, and system controls.

We recommend the vice president, Delivery Operations:

1. Establish national policies or procedures for out-of-service collection boxes to ensure consistent use, duration, and approval levels to maintain complete and updated information in the Collection Point Management System (CPMS).

2. Communicate to managers the importance of periodic reviews of employee access levels to CPMS.

We recommend the vice president, Delivery Operations to coordinate with vice president, Information Technology:

3. Modify the CPMS to add adequate reporting, tracking tools, and system controls to improve management and oversight for collection boxes placed in out-of-service status.

Management's Comments

Management agreed with recommendations 1 and 3, and disagreed with recommendation 2 and some of the report's statements and methodologies. Management disagreed that the out-of-service designation can only be limited to seven days. While they agreed that a number of conditions warrant the use of the out-of-service designation last a week or less, they stated there are however, many temporary circumstances that can extend well beyond a week. Management also stated that the recommendation to communicate the importance of periodic reviews of employee access levels, to modify CPMS to add additional reporting, tracking tools, and system controls is vague, subjective and non-quantifiable.

In response to recommendation 1, management agreed to establish national policies or procedures for out-of-service collection boxes to ensure consistent use, duration, and approval levels to maintain complete and updated information in the CPMS. Management also plans enhancements to the CPMS to assist with maintaining complete and updated information. Management's target implementation date is October 1, 2018.

In response to recommendation 2, management disagreed with communicating to managers the importance of periodic reviews of employee access levels to CPMS because the recommendation was vague, subjective and non-quantifiable. However, management stated they have been disseminating the up to date lists of area and district CPMS Administrators to the managers, Delivery Programs Support and lead area CPMS Administrators every other month for access level review and correction since May 2017 and will continue to do so at least twice annually. Management's target implementation date is September 30, 2017.

In response to recommendation 3, management agreed to modify the CPMS to add adequate reporting, tracking tools, and system controls to improve management and oversight for collection boxes placed in an out-of-service status. Management has prepared a Business Needs Statement for the enhancement of the CPMS. Management's target implementation date is October 1, 2018.

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

Evaluation of Management's Comments

The OIG considers management's comments responsive to the recommendations and corrective actions should resolve the issues in the report.

Regarding management's comments that the out-of-service designation cannot be limited to only seven days, as many temporary circumstances can extend well beyond a week, we agree. However, anything longer than seven days may warrant obtaining additional information regarding the status of the collection box.

Regarding management's disagreement with recommendation 2, management's proposed actions to disseminating current lists of area and district CPMS Administrators to the managers, Delivery Programs Support and lead area CPMS Administrators for access level review and correction satisfies the intent of our recommendation.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. 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**

The CPMS national database is a major source of information for management review and analysis of trends affecting collection boxes throughout the Postal Service.

Background

Collection boxes were introduced in 1858. The boxes originally served a number of purposes including serving as storage facilities for carriers who made their rounds on foot, holding items such as rain gear and coats. However, now that most carriers have vehicles, the gear is in the truck and the mailboxes are used primarily to collect mail. There were about 153,000 collection boxes at the end of FY 2016.

Collection points are locations where a customer drops off mail for collection by the Postal Service and are important access channels for Single-Piece First-Class Mail. They can include collection boxes, mail chutes, firm pickups, Self-Service Kiosks, lobby drops, and mail collection racks. The responsible district is required to enter all collection points in the CPMS, a database that includes collection point addresses, location types (e.g., Business, Residential, Post Office Lobby), box types (e.g., standard, jumbo, snorkel), days of the week the point is accessed, and the times it is accessed, including the final collection time. Collection boxes are a subset of collection points.

The CPMS is a nationwide database that manages information pertaining to all collection points, including Postal Service regular and Express Mail collection points. The CPMS provides a user interface that facilitates the entry and modification of data, while providing other services such as the printing collection box labels. The national database is a major source of information for management review and analysis of trends affecting collection boxes throughout the Postal Service. It is also available as a resource for auditing firms that perform independent audits of Postal Service customer service. The basic building block of the National database is the information provided by each district.

The CPMS is used to manage collection point information, which includes collection box type, location, service status, and location type. The service status indicates if the box is active or out-of-service.[6] If a collection box is temporarily unable to be collected from, the box can be placed into an out-of-service status in the CPMS, until collection services are restored. The Postal Service allows collection boxes to temporarily be placed in an out-of-service status if they are damaged and awaiting repair, removed for a parade, or cannot be collected due to unusual circumstances.

Objective, Scope, and Methodology

Our objective is to assess the Postal Service's processes for managing out-of-service mail collection boxes in the Great Lakes, Northeast, Pacific, Southern, and Western areas. To accomplish our objective, we:

- Reviewed and evaluated policies and procedures related to mail collection boxes.

- Obtained and analyzed collection box data from the CPMS Business Project Leader to identify Great Lakes, Northeast, Pacific, Southern, and Western area's collection boxes that were out-of-service.

- Interviewed headquarters, Postal Service Delivery officials to confirm our understanding of out-of-service and removal policies, collection box analysis tools, and exception reports.

- Selected a statistical sample of out-of-service collection boxes from the five areas that were out-of-service for longer than seven days as of March 31, 2017.

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6   Also referred to as "Suspended" or "Not in Service".

- Conducted site visits to Great Lakes, Northeast, Pacific, Southern, and Western areas and interviewed with area managers, Delivery Programs Support (DPS) and other responsible employees to gain a better understanding of their area's mail collection box out-of-service process, policies, oversight, and specific decisions for placing a statistical sample of collection box into an out-of-service status.

- Reviewed CPMS reporting capabilities, available reports, and administrator roles.

- Reviewed area and district personnel with CPMS system access with Area Delivery Program Support Managers.

- Reviewed controls to determine if they are sufficient to avoid potential financial and operational risks to the Postal Service associated with placing boxes into an out-of-service status.

We conducted this performance audit from April through September 2017 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 August 7, 2017, and included their comments where appropriate.

We assessed the reliability of CPMS data by interviewing agency officials knowledgeable about the data and conducting limited data testing. 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
Mail Collection Box Management Process – Capital Metro Area	To assess the process used to remove collection boxes or to place them out-of-service in the Capital Metro Area.	DR-AR-17-005	5/9/2017	None
Collection Box Removal Process – Eastern Area	To assess the collection box removal process in the Eastern Area.	DR-AR-16-007	8/22/2016	$3.5 million

District CPMS Administrative Access Privileges

Districts	District Administrative Access Privileges	Revised District Administrative Access
GREAT LAKES AREA		
Central Illinois	12	8
Chicago	10	5
Detroit	17	11
Gateway	16	10
Greater Indiana	13	11
Greater Michigan	10	6
Lakeland	14	11
GREAT LAKES TOTAL	**92**	**62**
NORTHEAST AREA		
Albany	8	6
Caribbean	6	5
Connecticut Valley	13	10
Greater Boston	11	9
Long Island	7	6
New York	18	12
Northern New England	5	4
Northern New Jersey	13	8
Triboro	9	7
Westchester	9	7
NORTHEAST TOTAL	**99**	**74**
PACIFIC AREA		
Bay Valley	14	8
Honolulu	9	6
Los Angeles	22	11
Sacramento	13	7
San Diego	10	9
San Francisco	15	8
Santa Ana	13	12
Sierra Coastal	6	5
PACIFIC TOTAL	**102**	**66**

Districts	District Administrative Access Privileges	Revised District Administrative Access
SOUTHERN AREA		
Alabama	12	9
Arkansas	10	4
Dallas	11	6
Fort Worth	6	4
Gulf Atlantic	9	9
Houston	21	11
Louisiana	7	4
Mississippi	5	5
Oklahoma	11	4
Rio Grande	16	9
South Florida	13	10
Suncoast	23	14
SOUTHERN TOTAL	**144**	**89**
WESTERN AREA		
Alaska	3	2
Arizona	10	2
Central Plains	4	2
Colorado/Wyoming	8	2
Dakotas	8	3
Hawkeye	4	2
Mid-America	10	3
Nevada Sierra	5	2
Northland	9	3
Portland	8	2
Salt Lake City	5	3
Seattle	4	3
WESTERN TOTAL	**78**	**29**
Grand Total	**515**	**320**

Source: OIG analysis of CPMS DA Users, as of May 3, 2017.

**UNITED STATES
POSTAL SERVICE**

August 30, 2017

LORI LAU DILLARD
DIRECTOR, AUDIT OPERATIONS

SUBJECT: Collection Box - Management of Service Status
          Report Number DR-AR-17-DRAFT

Headquarters City Delivery appreciates the opportunity to address the findings
and recommendations rendered by the Office of Inspector General (OIG) in its
Collection Box - Management of Service Status Report.

Specifically, the section of that Report, titled "What OIG Found," states as
follows:

"We recommended management establish national policies or procedures for
out-of-service collection boxes to ensure consistent use, duration, and approval
levels. We also recommended management communicate to managers the
importance of periodic reviews of employee access levels to CPMS, and modify
the system to add additional reporting, tracking tools, and system controls."

Headquarters City Delivery disagrees with the following presumptions and
methodologies:

That the out-of-service (OOS) designation can only be limited to seven days. As
stated in the audit: "The Postal Service allows collection boxes to temporarily be
placed in an out-of-service status if they are damaged and awaiting repair,
removed for a parade, or cannot be collected due to unusual circumstances."
While we agree that typically speaking a number of conditions that warrant the
utilization of the OOS designation last a week or less, there are however, many
temporary circumstances that can extend well beyond a week, to include
instances such as serious or fatal accident and or crime scene investigations as
well as floods and other natural disasters. The "7" days seems to be a reference
to a portion of a comment made by HQ City Delivery where mention was made of
the shorter end of an OOS event but fails to include the other end of temporary
events that could be extended longer.

That the recommendation to "communicate to managers the importance of
periodic reviews of employee access levels to CPMS, and modify the system to
add additional reporting, tracking tools, and system controls" is vague, subjective
and non-quantifiable.

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The OIG recommends that the vice president, Delivery Operations:

Recommendation #1
Establish national policies or procedures for out-of-service collection boxes to ensure consistent use, duration, and approval levels to maintain complete and updated information in the Collection Point Management System (CPMS).

Management Response/Action Plan
Management agrees with this recommendation. It is Headquarters City Delivery's contention that the currently under review Draft of the National SOP for Collection Box Removals once finalized will establish the policies and procedures for OOS collection boxes to ensure consistent use and duration. This draft was shared with the OIG at the start of this audit. The second portion of this recommendation is being addressed in recommendation #3 below.

Target Implementation Date
October 1, 2018

Responsible Official:
Vice President, Delivery Operations

Recommendation #2
Communicate to managers the importance of periodic reviews of employee access levels to CPMS.

Management Response/Action Plan
Management disagrees with this recommendation. This recommendation is vague, subjective and non-quantifiable. Headquarters City Delivery has been disseminating the up to date lists of Area & District CPMS Administrators to the Managers, Delivery Programs Support & lead Area CPMS Administrators every other month for access level review and correction since May and will continue to do so at least twice annually.

Target Implementation Date
September 30, 2017

Responsible Official:
Vice President, Delivery Operations

The OIG recommends that the vice president, Delivery Operations to coordinate with vice president, Information Technology:

Recommendation #3
Modify the CPMS to add adequate reporting, tracking tools, and system controls to improve management and oversight for collection boxes place in OOS status.

Management Response/Action Plan

Management agrees with this recommendation. Headquarters City Delivery contends that the Business Needs Statement (BNS) for the enhancement of CPMS, occasionally referred to as CPMS rewrite fulfills this recommendation. Headquarters City Delivery agrees that enhancements to CPMS are needed in order to bring the application to date with current needs, to include the creation of a history table that allows the retention of historical records for any deleted collection points, to include the USER ID who submits any points for deletion and the Area Administrator who approved the record.

Target Implementation Date

October 1, 2018

Responsible Official:

Vice President, Delivery Operations & Vice President, Information Technology

Jeffrey C. Johnson
Vice President,
Information Technology
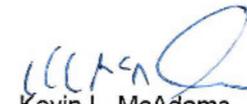
Kevin L. McAdams
Vice President,
Delivery Operations

cc: Kevin L. McAdams, Vice President, Delivery Operations
    Jeffrey C. Johnson, Vice President, Information Technology
    CARM

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