

OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

Los Angeles International Service Center – International Air Mail Records Unit

Audit Report

October 26, 2011

Report Number FT-AR-12-001



OFFICE OF INSPECTOR GENERAL UNITED STATES POSTAL SERVICE

HIGHLIGHTS

October 26, 2011

Los Angeles International Service Center – International Air Mail Records Unit

Report Number FT-AR-12-001

IMPACT ON:

International mail records processed at the Los Angeles International Air Mail Records Unit (records unit).

WHY THE OIG DID THE AUDIT:

Our objective was to determine whether the records unit, at the Los Angeles International Service Center (ISC), processes inbound international mail transactions timely and accurately so that bills to the foreign postal administrations are correct and timely.

WHAT THE OIG FOUND:

The Los Angeles records unit generally processed international mail transactions timely to ensure the St. Louis International Accounting Branch (accounting branch) timely billed foreign postal administrations. However, the records unit did not maintain supporting documentation, such as manifests or verification notes, to help ensure the accounting branch accurately billed foreign postal administrations. Also, the records unit did not perform a complete weekly audit of verification notes and management did not perform a complete review of the System for International Revenue and Volume Inbound (SIRVI) test data or approve test data daily.

WHAT THE OIG RECOMMENDED:

We recommended the plant manager, Los Angeles ISC, monitor compliance with policies for filing and retaining dispatch supporting documentation and provide targeted training to those not complying, reiterate the requirements for weekly verification notes audits, and ensure the audits are conducted in accordance with procedures.

We recommended the district manager, Los Angeles District, direct the manager Statistical Programs, Los Angeles District, to train all persons responsible for performing the review of SIRVI test data on the correct way to perform the review, reiterate the requirement to transmit SIRVI test data at the end of an assigned tour, and train additional personnel to perform the review and approval of test data daily.

WHAT MANAGEMENT SAID:

Management agreed with our findings and recommendations and stated they will begin a monitoring process to assess compliance with document filing and retention policies and conducted training to address the recommendations in this report.

AUDITORS' COMMENT:

The U.S. Postal Service Office of Inspector General considers management's comments responsive to the recommendations, and corrective actions taken or planned should resolve the issues identified in this report.

Link to review the entire report



October 26, 2011

MEMORANDUM FOR:	JOHN W. HOLDEN, PLANT MANAGER, LOS ANGELES INTERNATIONAL SERVICE CENTER
	EDUARDO H. RUIZ, JR DISTRICT MANAGER, LOS ANGELES DISTRICT
	SEROTINA ANDRADA MANAGER, STATISTICAL PROGRAMS, LOS ANGELES DISTRICT
	John E. Cillota
FROM:	John E. Cihota

John E. Cihota Deputy Assistant Inspector General for Financial Accountability

SUBJECT: Audit Report – Los Angeles International Service Center - International Air Mail Records Unit (Report Number FT-AR-12-001)

This report presents the results of our audit of the Los Angeles International Service Center – International Air Mail Records Unit (Project Number 11BM002FT002).

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Lorie K. Nelson, director, Financial Reporting, or me at 703-248-2100.

Attachments

cc: Joseph Corbett Giselle E. Valera Deborah Giannoni-Jackson Timothy F. O'Reilly Steven R. Phelps Robin M. Stewart Mary J. Mahnke Daniel L. Mastren Corporate Audit and Response Management

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Introduction

This report presents issues pertaining to inbound international mail at the Los Angeles International Service Center (ISC) – International Air Mail Records Unit (records unit) (Project Number 11BM002FT002). We identified these issues during our audit of the fiscal year (FY) 2011 U.S. Postal Service Financial Statements – St. Louis Information Technology and Accounting Service Center (Project 11BM002FT001). The objective was to determine if the records units process inbound international mail transactions timely and accurately to ensure that the St. Louis International Accounting Branch (accounting branch) can correctly and timely bill the foreign postal administrations.¹ This audit was self-initiated and addressed financial risk. See Appendix A for additional information about this audit.

Inbound international mail or dispatch is foreign-originating mail destined for delivery in the U.S. Foreign postal administrations pay the U.S. Postal Service for sorting, dispatching, and delivering inbound international mail at the ISCs. To assist in streamlining international mail processing, the Postal Service developed the Global Business System, which is comprised of the Receipt System, Dispatch System, and International Reconciliation System.² The International Reconciliation System assesses all records based on a set of validation rules and assigns a validation status -- pass or fail -- to each record. One reason records may fail the initial validation status is because the scan data from the Receipt System does not agree with the electronic data interface (EDI)³ data received from the foreign postal administrations. To complete the validation process, clerks must update the system with the most reliable data source in accordance with the Postal Service procedures and within established timelines. Clerks sometimes use verification notes ⁴ and manifests⁵ as tools in this process.

Foreign postal administrations pay terminal dues⁶ to the Postal Service for the delivery of mail to the final U.S. destination. Data from the System for International Revenue and Volume Inbound (SIRVI)⁷ provide country-specific volume estimates used to determine the terminal dues paid to the Postal Service for the delivery of foreign origin incoming mail. The data also supports regulatory requirements for revenue, pieces, and weight reporting, as well as cost analysis.

¹ Foreign postal administrations are posts outside the U.S. where mail is sent and received.

² The Receipt System captures the initial scan of international mail at the inbound receiving terminal. The Dispatch System captures the scan of outbound mail. The International Reconciliation System aids the tracking of international mail records, the identification of issues, and the reconciliation of discrepancies.

³ Foreign postal administrations can provide EDI data to the Postal Service before mail arrives at the ISCs. EDI contains dispatch information, including the dispatch date, and is prepopulated into the Receipt System. When the receiving unit clerk scans the 29-character barcode upon arrival at the ISC, the scan retrieves the EDI data and matches it with the receiving unit data.

⁴ These notes are formal messages between foreign postal administrations to relay information regarding the exchange of mail, in particular irregularities in the preparation, dispatch, and receipt of mail.

⁵ A document used to detail the inbound mail dispatches carried by third parties to the Postal Service for delivery through our network.

⁶ Payment to the Postal Service for a portion of the costs incurred to support, transport, and deliver foreign mail to its final U.S. address.

⁷ SIRVI is one of the data collection systems for international mail that captures pieces and weights from foreign origin mail entering the U.S..

Conclusion

The Los Angeles records unit generally processed international mail transactions timely to ensure the St. Louis accounting branch timely billed foreign postal administrations. However, the records unit did not maintain supporting documentation, such as manifests or verification notes, to help ensure the accounting branch accurately billed foreign postal administrations. Also, the records unit did not always perform a complete weekly audit of verification notes, and management did not always perform a complete review of SIRVI test data or review and approve SIRVI tests daily. Such reviews and approvals are necessary to ensure that country-specific volume estimates used to determine the terminal dues paid to the Postal Service for the delivery of foreign country incoming mail are correct.

Records Unit Supporting Documentation Retention

The Los Angeles records unit was not always able to support the international inbound dispatch data⁸ provided to the accounting branch for billing. Specifically, the unit was unable to provide supporting documentation, such as manifests or verification notes, for 15 of the 90 dispatches sampled for Quarters 1 and 2, FY 2011. We are 95-percent confident that the error rate was at least 10.58 percent for the 12,842 dispatches included in our universe. See Appendix B for statistical sampling and projection information. This occurred because the records unit misplaced, misfiled, or did not request supporting documentation.

The accounting branch uses scanned (SIRVI) data provided by the records unit to timely bill the foreign postal administrations, but manifests and verification notes provide the support for accurate billing. While the accounting branch has the ability to bill based on the scanned data, it needs a manifest or verification note as proof of billing accuracy if a foreign postal administration questions the amount it is being asked to pay. Additionally, the SIRVI data helps determine the accuracy of the terminal dues owed, but without the manifests or verification notes, the Postal Service is not in the position to effectively negotiate with a foreign postal administration.

The retention period for the supporting documentation is dependent on the mail class and whether the country settles via EDI. Specifically, for non-exclusion⁹ countries, the records unit is required to retain Express Mail[®] and letter bill supporting documentation for 30 months after the close of a quarter. Parcel bill supporting documents, for nonexclusion countries, are to be retained 18 months after the close of a quarter. Retaining dispatch documentation helps management support quarterly, annual, and supplemental billing in the event of a dispute with a foreign postal administration.

⁸ Inbound dispatch data related to a failed validation status.

⁹ The records unit is required to fix failed records for the 170 non-exclusion countries that settle using traditional Universal Postal Union (UPU) procedures for mail flows. The unit is not required to fix failed records for exclusion countries because they agree to settle via EDI messaging. One of the UPU's responsibilities is to establish international mailing procedures.

In FY 2010, we also reported that the Los Angeles records unit did not properly support inbound international letter post, Parcel Post[®], and Express Mail[®] service. In response to our recommendations, management finalized and communicated standard operating procedures related to obtaining and retaining Express Mail manifests and began daily and weekly talks stressing the importance of obtaining and maintaining supporting documentation for billing inbound international mail.¹⁰ These actions have not been sufficient to address the issue noted. We believe additional oversight and more targeted training may help address this repeat issue.

Oversight of Verification Notes

The supervisors did not always conduct weekly verification note (notes) audits in accordance with procedures. Specifically, a past supervisor did not perform the audit for 3 of 6 weeks, and the current supervisor, for 3 of 29 weeks. The supervisors incorrectly believed they audited the correct number of notes. Additionally, management did not monitor the supervisor's performance of these audits to ensure they audited the correct number of notes weekly. The records unit's standard operating procedures and a key Sarbanes-Oxley control¹¹ require supervisors to audit six notes of adjusted mail data weekly to verify the notes were created and responded to timely. Weekly audits are important to ensure the communications to the foreign postal administration are adequate and the accounting branch has the evidence needed to support the billing settlement process. Further, without adequate monitoring controls, supervisors miss opportunities to address errors in the clerks' input of inbound mail data. Detecting errors through the weekly audit process is a key factor in accurate recording of revenue, accelerates acceptance of the billing, and enhances cash collection.

Management advised that starting in July 2011, Headquarters, International Accounting, began monitoring weekly audits to ensure they were conducted in accordance with Postal Service procedures.

SIRVI Test Review and Approval

Management did not perform a complete review of SIRVI test data or approve SIRVI test data daily.¹² The Postal Service uses SIRVI test data in the billing and collection of terminal dues paid by foreign postal administrations for the delivery of foreign origin incoming mail. The Postal Service has identified the review as a key control in financial reporting. Management was unable to demonstrate the review of SIRVI test data because they did not receive formal or on-the-job training on how to perform a complete review of SIRVI test data. Also, the review and approval of SIRVI tests are not

¹⁰ Los Angeles International Service Center – Inbound International Mail (Report Number FT-AR-10-001, dated October 13, 2009).

¹¹ International Air Mail Records Units Standard Operating Procedures, May 31, 2011, and, Postal Service Control Number 114.CA010.

Web Base Unit Review Policy and the Statistical Programs

Management Guide. Management approve the tests so that they may be aggregated into the with other SIRVI test data.

performed daily because additional personnel are not trained to perform the daily review and approval when management is not available. In addition, the data collection technician delayed transmission of SIRVI test data to the **Sector** Web Base Unit,¹³ further contributing to delays in approving SIRVI tests. SIRVI test data that is fully reviewed and approved daily improves the reporting of accurate country-specific volume estimates, which contributes to the correct billing, recording, and collection of terminal dues.

Recommendations

We recommend the plant manager, Los Angeles International Service Center:

- 1. Monitor International Air Mail Records Unit staff compliance with Global Business policies for filing and retaining dispatch supporting documentation, and provide targeted training to those that are not complying with the policies.
- 2. Reiterate the requirements for weekly verification note audits, and ensure they are conducted in accordance with standard operating procedures.

We recommend the district manager, Los Angeles District, direct the manager, Statistical Programs, Los Angeles District, to:

- 3. Train all persons responsible for performing the completeness and reasonableness review of the System for International Revenue Volume Inbound test data on how to perform the review and provide periodic updates.
- 4. Train additional personnel to perform the review and approval of System for International Revenue and Volume Inbound test data daily.
- 5. Reiterate to all data collection technicians to transmit the System for International Revenue and Volume Inbound test data at the end of their assigned tour.

Management's Comments

Management agreed with our findings and recommendations. Regarding recommendations 1 and 2, in early October 2011, management provided training to all records unit staff to reiterate policies for filing and retaining supporting documentation. Although management did not address the monitoring aspect of recommendation 1 in their written comments, subsequent discussions disclosed they plan to perform an audit of one country from each class of mail twice a month to identify documents that are missing or were requested. The records unit supervisor will inform employees of resulting omissions and follow-up to make sure that employees obtained the necessary documents. Records unit supervisors will also be responsible for providing the ISC manager with a copy of the audit results, and the ISC manager will then randomly monitor records unit staff to ensure compliance with Global Business policies. These

¹³ The **Method** Web Base Unit serves as a central gathering place of collected data from a district's data collectors.

actions are planned to begin November 4, 2011. Additionally, the records unit supervisor immediately started performing verification note audits and posting the results weekly. As of July 2011, Headquarters, International Accounting, began monitoring weekly audits to ensure they are conducted in accordance with standard operating procedures.

Regarding recommendations 3, 4, and 5, in late September 2011, management provided classroom training to data collection staff and supervisors regarding data collection policies and procedures and reminded the statistical programs manager and supervisor to follow-up and review transmissions daily.

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

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations and corrective actions taken and planned should resolve the issues identified in this report.

The OIG considers recommendation 2 significant, and therefore requires OIG concurrence before closure. Because management took appropriate action to address the recommendation, the Postal Service may consider this recommendation closed in its follow-up tracking system.

Appendix A: Additional Information

Background

Inbound international mail is foreign-originating mail destined for delivery in the U.S. Foreign postal administrations pay the Postal Service for sorting and dispatching inbound international mail at the ISCs.¹⁴ In FY 2010, international revenue for inbound mail was approximately \$352 million. Currently, five records units¹⁵ process failed dispatch records for non-exclusion countries before the data is transmitted from the International Reconciliation System to the Foreign Post Settlement System and, subsequently, to the St. Louis International Accounting Branch for billing the appropriate foreign postal administrations.

When the Receipt System data does not agree with the EDI data, clerks are required to update the failed dispatch record within established timelines. When a record has failed or the records unit has not received billing documents, a verification note is created to request the documentation or note billing changes made by the records unit. The requested billing documents are used by the records unit as support in the billing settlement process. Supervisors are responsible for monitoring the failed records process, which includes the resolution of failed dispatch records, tracking verification notes,¹⁶ and performing audits of these notes.¹⁷

Quarterly, the accounting branch submits a request to the Eagan Information Technology and Accounting Service Center to generate, print, and mail billing reports to the accounting branch. Annually, the accounting branch prints billing reports when necessary.

SIRVI captures pieces and weights from foreign origin mail entering the U.S. and provides volume estimates for use in the determination of terminal dues paid to the Postal Service. SIRVI tests are conducted by data collection technicians (DCTs) at international exchange offices that receive foreign origin international mail. DCTs must immediately upload all completed SIRVI tests to the **Methode Service** is collecting all revenue due, management is required to perform a daily review and approve SIRVI tests before they are transmitted to the San Mateo mainframe for aggregation with the nation's test.

¹⁴ Six ISCs in New York, Miami, Chicago, Los Angeles, San Francisco, and Honolulu, as well as the New Jersey Network Distribution Center, process international mail.

¹⁵ The five units are Chicago, Los Angeles, New York, Honolulu, and New Jersey.

¹⁶ To track verification notes, supervisors must complete weekly the VN Volume Report, included on the Postal Service's Blue Share. They must indicate the number of notes from foreign postal administrations their clerks worked and are outstanding according to the age of the note.

¹⁷ Weekly, the supervisor audits six notes of adjusted mail data to verify the accuracy and timeliness of notes created and responded to in accordance with Universal Postal Union and Postal Service policy. The audit results are posted on an internal site called the Blue Share.

Objective, Scope, and Methodology

The objective of this portion of the audit is to determine if the records units process international mail transactions timely and accurately to ensure that the St. Louis International Accounting Branch can correctly and timely bill the foreign postal administrations.

This report addresses work performed at the Los Angeles records unit.¹⁸ To accomplish our objective, we traced billing data residing in the Foreign Post Settlement System to inbound international letter post, Parcel Post, and Express Mail source documents, verification notes, and International Reconciliation System data. We used a total unrestricted random sample size of 90 Los Angeles ISC and 60 Miami¹⁹ ISC dispatch records from October 2010 through March 2011. See Appendix B for our statistical sampling of the letter post, Parcel Post, and Express Mail.

We used the verification note audit log on the Postal Service's Blue Share to ensure all weekly audits of notes from October 2010 through June 2011 complied with the records unit standard operating procedures.

We interviewed management, assessed the **Management** Web Base Unit event logs, and analyzed the SIRVI test data reports to determine whether management reviewed and approved SIRVI test data.

We conducted this audit from June through October 2011 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 September 9, 2011, and included their comments where appropriate.

We relied on computer-generated data from Global Business System and Foreign Post Settlement System to develop our findings. We assessed the reliability of the data on these applications by tracing selected information on inbound international mail volumes to supporting source documents, verification notes, and other system data. We determined that the data were sufficiently reliable for the purposes of this report.

¹⁸ Separate reports will be issued for audit work performed at the Chicago and New York ISCs.

¹⁹ Management consolidated the Miami ISC records unit operations into the Los Angeles records unit operations, effective January 1, 2011.

Prior Audit Coverage

Report Title	Report Number	Final Report Date	Monetary Impact	Report Results
Fiscal Year 2010 Postal Service Financial Statements Audit – St. Louis Information Technology & Accounting Service Center	FT-AR-11-009	3/31/2011	\$0	The Chicago records unit supervisor did not review inbound verification notes created by the clerks. No recommendations were made in the report.
Los Angeles International Service Center – Inbound International Mail	FT-AR-10-001	10/13/2009	\$163,000	We determined that volume data used to bill foreign postal administrations for inbound international letter post, Parcel Post, and Express Mail service was not always accurate and properly supported. Management agreed with our findings and recommendations.
Miami International Service Center – Inbound International Mail	FT-AR-08-012	9/3/2008	\$2,084,620	We determined that manually entered dispatches for inbound international Express Mail were not always billed to the foreign postal administrations. No recommendations were made in the report.
New York International Service Center – Inbound International Mail	FT-AR-08-005	1/24/2008	\$13,700,604	We identified a high number of discrepancies between supporting documents and billing data for Express Mail and letter post mail. Management agreed with our finding and recommendations.

Appendix B: Statistical Sampling and Projections for Inbound International Letter Post, Parcel Post, and Express Mail at the Los Angeles ISC

The objective was to determine whether the records unit processes inbound international mail transactions timely and accurately to ensure that the St. Louis International Accounting Branch can correctly and timely bill the foreign postal administrations.

In support of this objective, we employed a simple random sample for all mail types. The sample design allowed statistical projection of the number of mail records with errors.

The audit universe consisted of 21,019 inbound international mail records processed at the Los Angeles records unit: 8,177 records for the Miami ISC and 12,842 records for the Los Angeles ISC, for the period October 1, 2010, through March 31, 2011. We used unrestricted random sampling of records for each ISC. We based our sample sizes on hypothesis testing sampling theory, which is a type of simple random attribute sampling. Our sample sizes for the Miami and Los Angeles ISCs are shown as follows.

The Los Angeles records unit audit consisted of the following universe of inbound dispatches.

ISC	Total Records	Parcel Post	Express Mail Service	Empty Receptacles	Letter Post
Los Angeles	12,842	2,761	4,397	14	5,670
Miami	8,177	1,778	3,684	9	2,706
Totals	21,019	4,539	8,081	23	8,376

We pulled random samples of 90 records of inbound dispatches for the Los Angeles ISC and 60 records for the Miami ISC. Following are the details regarding the samples.

ISC	Sample Size	Parcel Post	Express Mail Service	Empty Receptacles	Letter Post
Los Angeles	90	18	30	0	42
Miami	60	19	26	0	15
Totals	150	37	56	0	57

Evaluation of Sample – Statistical Projections of the Sample Data

Based on the sample results, the Miami ISC had an acceptable error rate. We found that the Los Angeles ISC was not always able to support the international inbound dispatch data, and we are 95-percent confident that the error rate was at least 10.58 percent.

ISC	Universe	Sample Size	Number of Errors	Minimum Error Rate (Percentage)
Miami	8,177	60	0	N/A
Los Angeles	12,842	90	15	10.58%

N/A means not applicable.

Appendix C: Management's Comments



October 6, 2011

Shiran B. Holland Acting Director, Audit Operations Office of Inspector General

Subject: Draft Audit Report-Los Angeles International Service Center-International Service Center-International Airmail Records Unit (Report Number FT-AR-11-DRAFT)

This memo is in response to findings and recommendations identified in the audit of the Los Angles International Service Center- International Airmail Records Unit (Project Number 11BM002FT002).

Listed below are the actions taken relative to the findings and recommendations 1 and 2:

 Monitor International Airmail Records Unit staff compliance with Global Business policies for filing and retaining dispatch supporting documentation and provide targeted training to those that are not complying with the policies.

This finding has been completed and we are in agreement. Training was provided for one hour the week of October 3-7, 2011 to all IAMRU clerks to reiterate policies for filing and retaining documents according to Standard Operating Procedure (SOP). The training consisted of reviewing SOP volume 12 for International Airmail Records Unit which consists of proper procedure for handling inbound and outbound documents and the retention policy dated April 1, 2010, which outlined timeframes for retaining documents for each class of mail for audit and dispute resolution.

The training consisted of:

- · Procedure for setting up filing system
- Maintaining files
- Receipt of documents requested
- Storage of Non-Exclusion countries
- Storage of Exclusion countries
- Retention Policy
- Verification Note Management
- Reiterate the requirements for weekly verification note audits and ensure they are conducted in accordance with standard operating procedures.

The finding has been completed and we are in agreement. The Supervisor of IAMRU will perform weekly verification note audits and post results on Blueshare by COB Wednesday in accordance with the standard operating procedure. The audit will consist of a total of 6 VN's: 3 FPA VN's and 3 USPS VN's from each class of mail. The audit is to ensure that the VN's were completed accurately and in a timely manner. As of July 2011, Headquarters, International Accounting began monitoring weekly audits to ensure they are conducted in accordance with SOP.

John W Holden

Plant Manager Los Angeles ISC

Los Angeles District



September 28, 2011

Shiran B. Holland Acting Director, Audit Operations Office of Inspector General

Subject: Draft Audit Report – Los Angeles International Service Center – International Air Mail Records Unit (Report Number FT-AR-11-DRAFT)

This memo is in response to findings and recommendations identified in the audit of the Los Angeles International Service Center – International Air Mail Records Unit (Project Number 11BM002FT002).

Listed below are the actions taken relative to the findings and Recommendations 3, 4, and 5 relating to remediation of SIRVI Test Review and Approval deficiencies:

3. Train all persons responsible for performing the completeness and reasonableness review of the System for International Revenue and Inbound test data on how to perform the review and provide periodic updates.

This finding has been completed and we are in agreement. Training was provided in a classroom setting for 8 hours during the week of September 19-22, 2011. The training consisted of reviewing the F-85 Handbook, Data Collection User's Guide for International Revenue, Volume, and Performance Measurement, which outlines the proper procedures for conducting SIRVI tests, and a thorough review of the F-95, Statistical Programs Management Guide Section 8.6, Web Base Unit Review Policy for SIRVI; and hands-on training of the GBS (Global Business Systems) International Receipt User Guide. A total of 17 DCTs were trained, in addition to the Manager, Financial Programs Compliance, SMEs and Supervisor Statistical Programs.

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4. Train additional personnel to perform the review and approval of System for International Revenue and Volume Inbound test data daily.

This finding has been completed and we are in agreement. Training was provided in a classroom setting for 8 hours during the week of September 19-22, 2011. Training was conducted for 17 DCTs in addition to the Manager, Financial Programs Compliance, SMEs and Supervisor Statistical Programs. Training was in a classroom setting for 8 hours and in accordance with the review and approval policy outlined in the F-95, Statistical Programs Management Guide and the F-85 Handbook, Data Collection User's Guide for International Revenue, Volume, and Performance Measurement Systems.

The training consisted of:

- Scale Calibration
- GBS International Receipt Systems
- Receptacles selected by GBS
- Review of Country Group Codes
- Selecting and Returing Receptacles
- Conducting SIRVI tests
- Identifying Origin Country
- Identifying Receptacles Types
- Identifying Label Class
- · Reviewing Rceptacle Weight kg. and Alt. wt.
- Explain Transportation Modes
- Identifying Lock Out Times
- Identifying test timeframes for each tour
- · Performing daily transmission of tests on each tour
- · Identifying how to review and approve tests daily
- Identifying test printouts
- Establishing a filing system to maintain printouts and printer notices

5. Reiterate to all data collection technicians to transmit the System for International Revenue and Volume Inbound test data at the end of their assigned tour.

This finding has been completed and we are in agreement. Training was provided in a classroom setting for 8 hours during the week of September 19-22, 2011. Training was conducted for 17 DCTs in addition to the Manager, Financial Programs Compliance, SMEs and Supervisor Statistical Programs. All - 3 -

attendees were trained to transmit their tests at the end of their tour in accordance with the F-85 Handbook, Data Collection User's Guide for International Revenue, Volume, and Performance Measurement. The manager and supervisor were reminded to follow-up and review the transmissions daily on

Web Base Unit and the receptacles were returned and mail returned to mail processing, timely. They were also reminded to make sure they account for all tests

Martin ami



Eduardo H. Ruiz District Manager

CC:

John Holden, Plant Manager, Los Angeles ISC Daniel Mastren, Manager, Finance Serotina Andrada, Manager, Statistical Programs