

Parcel Return Service - Consolidator Payment and Refund Errors

AUDIT REPORT

Report Number 23-038-R24 | January 9, 2024



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Highlights

Background

Consumers return about one-in-six online purchases. Despite growth in the returns market, the U.S. Postal Service's Parcel Return Service (PRS) volume has declined in recent years. Introduced in 2003, the PRS product caters to private-sector consolidators that facilitate returns on behalf of merchants, generating \$241.8 million in Postal Service revenue in fiscal year (FY) 2022 on 70.3 million packages. Growing the PRS product aligns with the Postal Service's *Delivering for America* 10-year plan.

What We Did

Our objective was to evaluate the process for, cause of, and validity of refunds associated with the PRS product and examine the accuracy of manifested prices—the postage payments consolidators submit based on contractual rates. We conducted site visits and interviews, and analyzed package data and consolidator refund requests.

What We Found

The Postal Service accepted 22.8 million PRS packages at the wrong price, resulting in \$25 million in lost revenue between October 2020 and September 2023. Although the Postal Service reviewed some aspects of manifested prices, it did not track the type of facility—processing plant or delivery unit—where packages were retrieved, a significant factor in determining price. Integrating this element into its verification process would help ensure that the Postal Service consistently receives the correct postage.

Also, the Postal Service did not always comply with contractual requirements to hold packages for at least 48 hours to give consolidators time to retrieve them. Those violations made 3.2 million packages eligible for refunds during our scope period. While robust procedures and training exist, employees sometimes failed to follow the process and management did not consistently hold them accountable. Without automation to reduce human error, the Postal Service risks losing business in the returns market. Finally, the Postal Service granted ██████████ in PRS refunds between November 2021 and September 2023 that may not have been warranted, due to a flawed refund verification process. The flaws exposed the Postal Service to the risk that consolidators could request and receive refunds for additional packages that do not qualify.

Recommendations

We recommended management 1) strengthen the manifest verification process by incorporating facility type, 2) simplify the return delivery unit processes to improve compliance and enable better supervision, 3) conduct analysis on automating the process to align package handling with established PRS procedures or identifying alternatives to improve compliance, 4) develop and maintain an accurate list of active return delivery units, and 5) enhance the PRS refund review process to include an automated validation that refunds are warranted.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

January 9, 2024

MEMORANDUM FOR: THOMAS FOTI
VICE PRESIDENT, PRODUCT SOLUTIONS

ELVIN MERCADO
VICE PRESIDENT, RETAIL AND POST OFFICE OPERATIONS

A handwritten signature in black ink, reading "Amanda H. Stafford", is centered below the recipient names.

FROM: Amanda H. Stafford
Deputy Assistant Inspector General
Retail, Marketing, & Supply Management

SUBJECT: Audit Report – Parcel Return Service Payment and Refund
Errors (Report Number 23-038-R24)

This report presents the results of our audit of Parcel Return Service.

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

Attachment

cc: Postmaster General
Corporate Audit Response Management

Results

Introduction/Objective

This report presents the results of our self-initiated audit of Parcel Return Service (PRS) refunds and manifested prices (Project Number 23-038). Our objective was to evaluate the process for, cause of, and validity of refunds associated with the U.S. Postal Service's PRS product and examine the accuracy of manifested prices. See [Appendix A](#) for additional information about this audit.

Background

Consumers return about one-in-six online purchases. In fiscal year (FY) 2022, 70.3 million of those returned packages were sent using the Postal Service's PRS product. When consumers initiate those online returns, the merchants provide PRS labels, which the consumers attach to their return packages before depositing them into the mailstream. The Postal Service then hands the packages to PRS partners — consolidators hired by the merchants to complete the returns process.

The shipping of online returns is a \$14 billion industry, and the Postal Service wants to grow its share of the returns market. However, the Postal Service's PRS volume declined for four consecutive years — falling 21 percent between FYs 2018 and 2022 — despite significant growth in the online returns market. PRS, which was introduced in 2003, is one of several Postal Service offerings for returns. The Postal Service administers PRS through negotiated service agreements (contracts) with three consolidators, which accounted for more than 99 percent of PRS volume in FY 2022.¹ The PRS product, which the Shipping & Commerce Product Management group oversees, generated \$241.8 million in revenue for the Postal Service that year. The Postal Service made growing its package returns business a goal of the *Delivering for America* 10-Year Plan and aims to be a provider of choice in the returns market.

PRS Pricing Depends on Where Consolidators Retrieve Packages

Consolidators pay higher prices for packages they pick up from Postal Service processing plants and lower prices for packages retrieved from select delivery units. Delivery units are facilities — typically post offices — where mail carriers operate. The Postal Service has designated roughly 13,000 delivery units eligible for PRS package pickups. These facilities are called Return Delivery Units (RDU). Each consolidator can select the RDUs from which to pick up their PRS packages, making those RDUs “active” for that consolidator.² The lower RDU price applies for any packages retrieved from active RDU locations, and nearly two-thirds of PRS packages in FY 2022 were billed at that price. As of October 26, 2023, 7,201 RDUs were listed as active for at least one consolidator. The list of active RDUs is fluid, as consolidators can activate and deactivate RDUs at any time.

After consolidators retrieve PRS packages from plants or RDUs, they have 72 hours to submit a manifest and payment to the Postal Service. The manifest is a report that details package information, including the type of facility from which the package was retrieved (plant or RDU), the package's weight, and the price the consolidator paid (manifested price). The Postal Service continuously reviews a sample of PRS packages to verify the accuracy of manifested prices. Specifically, it compares package attributes (weight and dimensions) against the prices reflected in the manifest and regularly makes pricing adjustments to correct errors.

Whether a PRS package goes to a plant or RDU depends on whether the consumer deposits it into the mail at an RDU that is active for the consolidator that will receive the package, as shown in [Figure 1](#). If consumers mail their returns at an active RDU, then Postal Service employees must follow specific procedures for those packages, including separating them from all other incoming mail and holding them

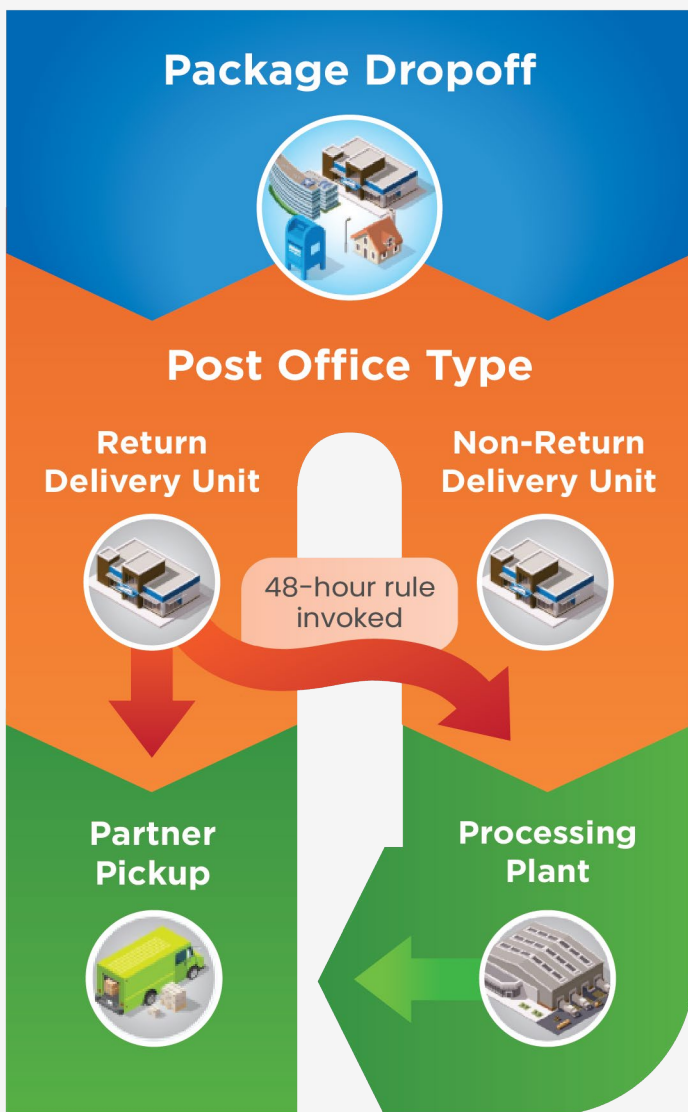
¹ PRS consolidators have long had negotiated service agreements, which are custom contracts for pricing and terms of service. In January 2023, the Postal Service eliminated published prices for PRS and began operating exclusively through negotiated service agreements. At that point, one longtime consolidator, which had an agreement in the past but had been paying published prices for two years, entered into a new PRS agreement.

² Consolidators frequently hire couriers to retrieve PRS packages from RDUs.

for 48 hours to give consolidators time to retrieve them (the 48-hour rule). If the consolidator retrieves the package within 48 hours, the lower RDU price applies. However, if the consolidator does not retrieve the package within 48 hours, the Postal Service will send the package to the plant, and the consolidator will pay the higher plant price. Likewise, if the consumer drops their PRS package at a facility that is not an active RDU for the consolidator that will receive the package, then the package will be sent to the plant, and the higher price applies.³

Figure 1. PRS Process Flow Chart

Parcel Return Service: From Consumer Dropoff to Partner Pickup



Source: OIG analysis of policy documents.

RDU must follow detailed PRS procedures, and the postmasters and managers who oversee RDUs must ensure that their facilities follow the process correctly. The External Customer Integration team at the Postal Service works to improve RDU compliance. The team created robust PRS procedures and training materials, which it pushes out weekly to RDU managers; holds quarterly internal webinars to train RDU staff on PRS procedures; and created internal dashboards to monitor RDU compliance.

PRS Refund Process

If RDUs do not follow PRS procedures, it can hurt the Postal Service financially. Specifically, if RDUs send PRS packages to the plant without waiting 48 hours, consolidators can request a refund for the difference between the higher plant price and the lower RDU price they would have paid if the package had been appropriately handled. The consolidators began submitting refund requests in November 2021 through the Postal Service’s Electronic Verification System (eVS), which facilitates the manifests and payments for PRS and other products. As of September 2023, only one consolidator requested refunds, and the Postal Service paid [REDACTED]. The consolidator weekly submitted detailed spreadsheets that identified each package, its weight, the amount the consolidator paid, the amount it should have paid, and the refund amount due.

The Postal Service’s refund verification process changed over time. Initially, the Postal Service did not dispute any of the refunds, approving them in full. In March 2022, the Postal Service began consistently verifying the refund amounts for each package, finding that the consolidator’s refund amounts were overstated by several thousands of dollars per batch. In January 2023, the Postal Service further strengthened the process by consistently confirming whether the facility that accepted the packages was an active RDU for the consolidator requesting the refund – a requirement for the refund to be valid. This additional check reduced the number of pieces eligible for refunds by an average of 16 percent.

³ If a consumer drops a PRS package into a blue collection box or in their home mailbox, a carrier will collect it and take it to their delivery unit. If that delivery unit is an active RDU for the consolidator that will retrieve the package, then the package is eligible for the RDU price. Otherwise, the package will go to the plant.

Finding #1: Pricing Verification Deficiencies Drive Revenue Loss

Between October 2020 and August 2023, the Postal Service accepted 22.8 million PRS packages at the wrong rate.⁴ This included 19.9 million underpayments, where packages were picked up from plants but manifested at the lower RDU rate, and 2.9 million overpayments, where a consolidator picked up packages from RDUs but manifested them at the higher plant rate as shown in Figure 2. This occurred because the Postal Service’s pricing verification process did not include the type of facility — a key element in determining the price consolidators pay for PRS packages.

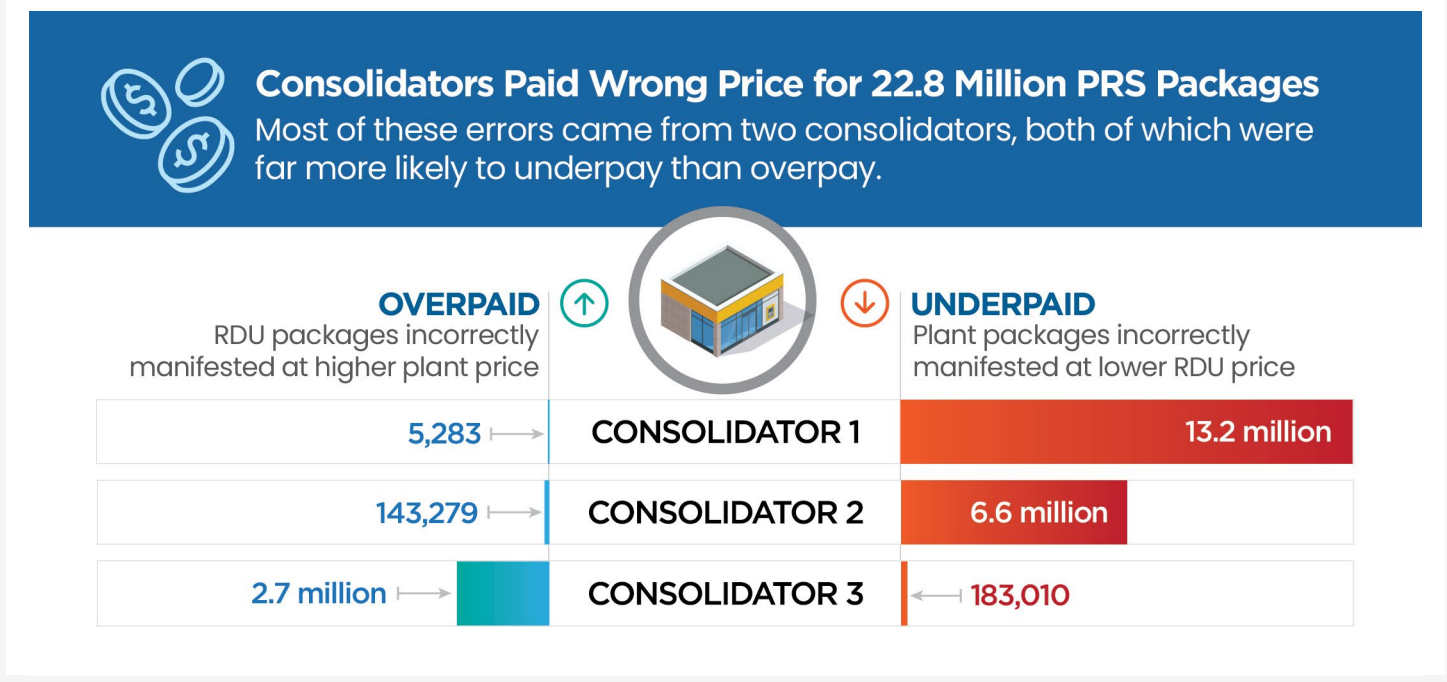
Postal Service policy requires that it verify postage is accurate and conforms to the pricing requirements of the agreement. The Postal Service acknowledged

the gap in its manifest review process and plans to eventually move PRS from eVS to USPS Ship, a new manifesting and payment system that Postal Service officials said will incorporate facility type into the pricing verification process. The Postal Service said in November 2023 Federal Register notice that it aims to migrate to the new system by February 1, 2025. Between October 2020 and August 2023, the Postal Service was underpaid by \$25 million.⁵ If past trends were to continue, we project the Postal Service would lose another \$29.4 million through July 2026, in questioned costs.⁶

Recommendation #1

We recommend the **Vice President, Product Solutions**, strengthen the Parcel Return Service manifest verification process by incorporating the facility type as a required parameter.

Figure 2. Manifest Errors



Source: OIG analysis of PRS scans and manifest data from October 2020 to August 2023.

4 The data required to do our analysis were only available going back to October 2020.

5 The most recent 24 months (\$19.6 million) are categorized as revenue loss. Revenue loss applies to funds such as postage, retail sales, rent leases, or fees the Postal Service is entitled to receive but was underpaid or not realized because policies, procedures, agreements, or requirements were lacking or not followed.

6 Questioned Costs are costs the OIG believes are unnecessary, unreasonable, or an alleged violation of law, regulation, or contract. The OIG analyzed 35 months of manifest error data (October 2020 to August 2023), which enabled us to forecast questioned costs out 35 months into the future to July 2026.

Finding #2: PRS Contract Requirements Not Met

Between October 2020 and August 2023, the Postal Service incorrectly sent 3.2 million PRS packages to the plant less than 48 hours after applying the “available for pickup” scan, which does not comply with the PRS contracts. Additionally, our analysis of PRS package scan data showed other frequent procedural violations, including:

- Failing to apply required scans,
- Applying the wrong scans, and
- Holding packages for too long.

One in six PRS packages had one of these four types of errors. This demonstrates that RDU managers are not adequately enforcing PRS compliance, as required. We observed some of these issues when we visited 21 active RDUs in New York City, Philadelphia, Chicago, and Dallas. Despite readily available training materials, management at two-thirds of the RDUs we visited did not provide that training to their staff. Additionally, the staff we interviewed were often unfamiliar with the proper procedures if a consolidator failed to pick up packages.

Officials from the External Customer Integration team acknowledged that PRS procedures are cumbersome and expressed concerns with RDU managers not providing adequate supervision over the process, despite significant efforts to disseminate training. Persistent compliance issues have fueled discussions within the External Customer Integration team about the viability of the current RDU processes. At least one consolidator had indicated that the poor scanning performance was causing its PRS customers to look for alternatives to the Postal Service for their returns.

The Postal Service could improve compliance and reduce PRS contract violations by implementing automated guardrails that align package handling practices with established PRS procedures. Postal Service officials stated that some RDUs have begun using package processing equipment to apply the first two scans to PRS parcels, and such initiatives could be expanded. If the Postal Service continues

to make frequent package handling and scanning errors, PRS volume may continue to decline, putting the Postal Service farther behind on its goal to be a provider of choice in the online returns market.

Recommendation #2

We recommend the **Vice President, Retail and Post Office Operations**, simplify the return delivery unit processes to improve compliance and enable better supervision.

Recommendation #3

We recommend the **Vice President, Retail and Post Office Operations**, align package handling with Parcel Return Service procedures by 1) conducting a cost, benefit, and feasibility analysis for establishing and implementing an automated process, or 2) identifying and implementing alternatives to improve compliance.

Finding #3: Refund Review Process Insufficient to Determine Eligibility

Between November 2021 and September 2023, the Postal Service issued ██████████ in PRS refunds that may not have been warranted.⁷ This was due to an inadequate refund review process, which fell short in two critical ways. First, the Postal Service relied on an outdated list of active RDUs to verify refund eligibility. Consolidators frequently activate and deactivate RDUs, so it is essential to have an RDU list that aligns with the dates when the packages were accepted. The Postal Service acknowledged that the RDU activation data in its Facilities Database are frequently wrong. Further, seven of the 21 RDUs we visited had incorrect activation data.

Second, the Postal Service only conducted informal spot-checks of a few packages to determine whether the refunds were warranted, rather than reviewing scan data for each package in the consolidator’s refund request. Our review of the complete scan data showed that only 14 percent of the packages requested for refunds were sent to the plant less than 48 hours after receiving an “available for pickup” scan. Nevertheless, the Postal Service approved refunds for 97 percent of the packages submitted.

⁷ The scope period for this audit is October 2020 to August 2023. The refund dates differ because consolidators began requesting refunds in November 2021. Four of the refunds included in our audit were issued in September 2023, though they were requested during our scope period.

Postal Service policy requires only qualified refunds to be issued. Without an accurate list of RDUs or a review of scan data for each package, the Postal Service cannot verify whether a package should be refunded. As such, the Postal Service faces the risk that consolidators could abuse the refund process, requesting and receiving refunds for additional packages that do not qualify. As a result of the insufficient refund review process, the entire [REDACTED] in PRS refunds that the Postal Service issued during our scope period are unsupported questioned costs.⁸

Recommendation #4

We recommend the **Vice President, Retail and Post Office Operations**, develop and maintain an accurate list of active return delivery units in the Facilities Database.

Recommendation #5

We recommend the **Vice President, Product Solutions**, enhance the Parcel Return Service refund review process to include an automated validation to verify that refunds are warranted, including an assessment of whether the return delivery units that received the packages were active at the time of mailing.

Management's Comments

Management agreed with all findings and recommendations and with the monetary impact.

Regarding recommendation 1, management agreed to incorporate facility type into the manifest verification process. It will accomplish this by moving PRS from the eVS manifest and payment system to USPS SHIP, which examines facility type. The target implementation date is February 1, 2025.

Regarding recommendation 2, management stated it has made modifications to its Delivery Schemeless Sortation (DSS), Passive Adaptive Scanning System (PASS), and Mobile Delivery Device in Office (MDDIO) devices in RDUs to streamline the PRS process and improve compliance. The target implementation date is January 31, 2024, and the Postal Service requested that the recommendation be closed upon issuance of the final report.

Regarding recommendation 3, management stated it will further automate PRS package handling and adjust processes and measurements that improve visibility of PRS compliance and performance issues. These changes will support PRS dashboard enhancements. The target implementation date is August 31, 2024.

Regarding recommendation 4, management stated they completed changes in July 2023 that created a direct link to the Facilities Database to allow consolidators to update the active RDUs. Accordingly, management said (1) the Facilities Database represents a current, accurate list of active RDUs; (2) consolidators are responsible for updating RDU activation status; and (3) RDU status is validated through weekly meetings with consolidators. The target implementation date is January 31, 2024, and the Postal Service requested that the recommendation be closed upon issuance of the final report.

Regarding recommendation 5, management stated it will enhance the PRS refund review process by migrating from the eVS to USPS SHIP. The target implementation is February 1, 2025.

See [Appendix B](#) 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 recommendations 1, 2, 3, and 5 in the report, and the corrective actions should resolve the issues identified.

Regarding recommendation 4, management asserted that the Facilities Database constitutes an accurate list of active RDUs due to the Postal Service's July 2023 changes to the systems that govern the RDU activation status. To test the Facility Database's accuracy, we reviewed a random sample of active RDUs on December 11, 2023. We spoke with the postmasters, managers, or supervisors, asking them which PRS consolidators picked up packages from the facility and compared their responses to the consolidators listed as active in the Facilities

⁸ Unsupported Questioned Costs are those costs that are called into question because of missing or incomplete documentation, or because of failure to follow required procedures.

Database on that day. We found that the Facilities Database was inaccurate for six of the 27 facilities, an error rate of 22 percent. This confirmed our observations during our field visits in August and September 2023, where the Facilities Database was inaccurate for seven of the 21 RDUs we visited. To monitor whether an RDU is properly handling PRS packages, the Postal Service must know whether the facility is active. The Postal Service should develop a solution to maintain an accurate list of active RDUs in the Facilities Database, as indicated in recommendation 4. As a result, we do not agree that the actions taken have corrected the issues identified and will not close the recommendation upon issuance of the report, but instead will further engage with management on the recommendation.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. Recommendations 1, 3, 4, and 5 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. We agree to close recommendation 2 as implemented upon the report's issuance.

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Appendix A: Additional Information

Scope and Methodology

Our audit scope was the Parcel Return Service product, including manifested packages, violations of the 48-hour rule, and the associated refunds from October 2020 through August 2023. To accomplish our objective, we:

- Interviewed Postal Service officials, supervisors, and clerks responsible for key aspects of the PRS process and the refunds due to 48-hour rule violations.
- Reviewed and analyzed PRS package scanning data to determine the scope of 48-hour rule violations and whether scans match the manifested pricing category (e.g. packages manifested at the RDU rate were scanned as having been picked up from an RDU).
- Reviewed detailed data related to requested refunds for PRS.
- Obtained and reviewed documentation related to the PRS product, including negotiated service agreements, Postal Service publications, and training materials outlining the proper package handling procedures.
- Visited 25 facilities (RDUs and plants) to observe compliance with PRS procedures and interview staff about handling PRS packages.

We conducted this performance audit from February through December 2023 in accordance with generally accepted government auditing standards and included such tests of internal controls as we considered necessary under the circumstances. Those standards require that we plan and perform

the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our observations and conclusions with management on December 7, 2023, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of the PRS internal control structure to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the product and mitigating associated risks. Additionally, we assessed the internal control components and underlying principles, and we determined that the following three components were significant to our audit objective: control activities, information and communication, and monitoring.

We developed audit work to ensure that we assessed these controls. Based on the work performed, we identified internal control deficiencies related to the Postal Service’s PRS pricing verification and refund review processes that were significant within the context of our objectives. Our recommendations, if implemented, should correct the weaknesses we identified.

We assessed the reliability of computer-generated data from the Postal Service’s Product Tracking and Reporting system by reviewing and analyzing the package scan 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>Parcel Return Service - Los Angeles District</i>	To evaluate operations and control over the processing and distribution of PRS mail in the Los Angeles District	MS-AR-18-004	June 1, 2018	None

Appendix B: Management's Comments



December 29, 2023

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Parcel Return Service — Consolidator Payment and Refund Errors (Report Number 23-038-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, *Parcel Return Service (PRS) — Consolidator Payment and Refund Errors*.

Management agrees with Finding #1:

'Pricing Verification Deficiencies Drive Revenue Loss'

Management agrees to not only examine the attributes of weight and dimension during the verification process; but also include the type of facility. Management will be moving Parcel Return Service (PRS) from the Electronic Verification System (eVS) to USPS Ship, a new manifesting and payment system, which will incorporate the facility type into the pricing verification process.

Management agrees with Finding #2:

'PRS Contract Requirements Not Met'

Management has already implemented changes to the Delivery Scanning System (DSS), Passive Adaptive Scanning System (PASS), and Mobile Delivery Devices In Office (MDDIOs) processes and training is ongoing.

Management agrees with Finding #3:

'Refund Review Process Insufficient to determine Eligibility'

There were concerns with the accuracy of the active Return Delivery Units (RDUs), as consolidators frequently activate and deactivate the RDUs. To ensure timely and accurate lists, Management is in the process of migrating from eVS information to USPS Ship. However, management made immediate changes that allows data to flow from the Business Customer Gateway (BCG) portal directly into the Facilities Database (FDB) on a nightly basis. This has eliminated all delays of data processing. Additionally, weekly meetings are held to discuss PRS accuracy with our partners.

Management agrees with the monetary impact concerns shared by the OIG. The PRS refund verification process has been reviewed and is being modified to an automated system to eliminate human errors.

Following are Managements comments on each of the five recommendations.

Recommendation 1:

We recommend the Vice President, Product Solutions, strengthen the Parcel Return Service manifest verification process by incorporating the facility type as a required parameter.

Management Response/Action Plan:

Management agrees with the recommendation to include the type of facility along with the attributes of weight and dimension during the verification process. Management plans to move PRS from eVS to USPS Ship, a new manifesting and payment system which will incorporate the facility type into the pricing verification process.

Target Implementation Date: 02/01/2025

Responsible Official: Director Commercial Product Payment and Policy

Recommendation 2:

We recommend the Vice President, Retail and Post Office Operations, simplify the return delivery unit processes to improve compliance and enable better supervision.

Management Response/Action Plan:

Management agrees with the recommendation. Changes which have streamlined and improved compliance with RDU processes have been made to the DSS, PASS, and MDDIO devices. Additionally, daily, and weekly performance messaging will continue to be sent out to the Field with reviews conducted for poor performing offices.

Target Implementation Date: 01/31/2024

Requesting closure with issuance of the Final Report.

Responsible Official: Manager, Customer Operations and Acquisition

Recommendation 3:

We recommend the Vice President, Retail and Post Office Operations, align package handling with PRS procedures by 1) conducting a cost, benefit, and feasibility analysis for establishing and implementing an automated process, or 2) identifying and implementing alternatives to improve compliance.

Management Response/Action Plan:

Management agrees with the recommendation. Management will work with the Delivery Integration and Engineering departments to further automate PRS package handling. This will include changes to the PRS process and measurements reflected in the USPS Enterprise Data Warehouse (EDW) database to provide greater visibility and identification of compliance and performance opportunities. These changes will support current and future dashboard enhancements.

Target Implementation Date: 08/31/2024

Responsible Official: Manager, Customer Operations and Acquisition

Recommendation 4:

We recommend the Vice President, Retail and Post Office Operations, develop and maintain an accurate list of active return delivery units in the Facilities Database.

Management Response/Action Plan:

Management agrees with the recommendation. Changes were completed in July 2023 and information is now fed directly from the BCG portal into FDB to reflect an accurate, current list of RDUs. The customer is responsible for updating and making the necessary required changes in their BCG account. The information is validated in both the BCG portal and FDB through weekly mailer meetings.

Target Implementation Date: 01/31/2024

Requesting closure with issuance of the Final Report.

Responsible Official: Manager, Customer Operations and Acquisition

Recommendation 5:

We recommend the Vice President, Product Solutions, enhance the PRS refund review process to include an automated validation to verify that refunds are warranted, including an assessment of whether the return delivery units that received the packages were active at the time of mailing.

Management Response/Action Plan:

Management agrees with the recommendation. This will be accomplished with the migration of eVS to USPS Ship.

Target Implementation Date: 02/01/2025

Responsible Official: Director Commercial Product Payment and Policy

E-SIGNED by THOMAS.J FOTI
on 2023-12-29 09:59:46 EST

Thomas J. Foti
Vice President, Product Solutions

E-SIGNED by TRACY.R RAYMOND
on 2023-12-29 11:53:53 EST

Tracy R. Raymond
on behalf of Elvin Mercado, Vice President,
Retail and Post Office Operations

cc: *Corporate Audit and Response Management*

OFFICE OF INSPECTOR GENERAL

UNITED STATES



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