

SECURE DESTRUCTION PILOT PROJECT

*United States Postal Service
Office of Sustainability*



Sustainability
PUTTING OUR STAMP ON A
GREENER TOMORROW

- **Final Draft FAQs Sheet (Short Version)**
- **SD Service Type IDs (STIDs) and Option Types**
- **SD Markings on Mailpiece**
- **Selection Criteria and Proposed SD Pilot Sites**
- **Anticipated Pilot Project Schedule**
- **Postal SD Services vs. NAID Security Standards**
- **Legal Update**
- **Mailer Survey**
- **Discussion**

Prepared Frequently Asked Questions for Interested Mailers

1. What is Secure Destruction?

Secure Destruction of Intelligent Mail Services

1. What is Secure Destruction?

Secure Destruction describes a potential new mail program under consideration by the Postal Service that will allow mailers to opt to have mail that would otherwise be returned-to-sender disposed of in a secure manner. This means that an undeliverable-as-addressed (UAA) mail piece will be shredded by USPS Employees at USPS facilities, to ensure the mail piece will be rendered unreadable prior to disposal. A typical description of Secure Destruction is that the mail piece will be shredded into smaller pieces so that it is impractical to attempt to retrieve information from the mail piece.

As part of the provision of the Secure Destruction program, the US Postal Service will also look to implement, where practical, industry best practices regarding the recycling of mail and other materials.

2. Why is the Postal Service Proposing Secure Destruction as a Service?

Today, the Postal Service returns over 1.2 billion pieces of First-Class Mail each year. Returning mail to the sender adds cost to both postal operations and to mailer operations. Disposing of this UAA mail instead of returning it can reduce the cost impact to both the Postal Service and the mailer. However, many mailers are reluctant to allow their sensitive mail to be disposed of unless they can be assured that this mail cannot be retrieved and used to obtain sensitive data. The Postal Service has developed the Secure Destruction service to respond to mailer's concerns, allowing savings to be achieved by both the Postal Service and mailers.

3. How will Secure Destruction be performed?

Secure destruction of UAA mail will be triggered by the presence of the appropriate Service Type Identification (STID) embedded in the Intelligent

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Proposing Secure

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Secure Destruction Service Type Identification (STID)

- **16 Service Type Identification (STID) numbers will be created for Secure Destruction**
- **Numbers will be available for use after the Postal Automated Redirection System (PARS) software is updated this spring**
- **Initial use of SD STIDs will be limited to mailers participating in the Pilot Project**
- **Future use of SD STIDs will be based on the outcome of the Pilot Study**

SD Service Type IDs (STIDs)

Service Type Identification Numbers for Secure Destruction Effective July 1, 2013 for 7 Pilot Sites

Class of Mail	Address Correction Option	Basic & Non-auto option w/o IMb Tracing	Basic and Non-auto option with IMb Tracing	Full-Service w/o IMb Tracing	Full-Service with IMb Tracing
First-Class Mail	Traditional ACS Format – Change Service Requested Opt 1 w/Secure Destruction	528	527	525	523
	Traditional ACS Format – Change Service Requested Opt 2 w/Secure Destruction	531	526	533	532
	OneCode ACS – Change Service Requested Opt 1 w/Secure Destruction	520	518	-	-
	OneCode ACS – Change Service Requested Opt 2 w/Secure Destruction	315	321	-	-
	Full-Service ACS – Change Service Requested Opt 1 w/Secure Destruction	-	-	524	522
	Full-Service ACS – Change Service Requested Opt 2 w/Secure Destruction	-	-	335	331

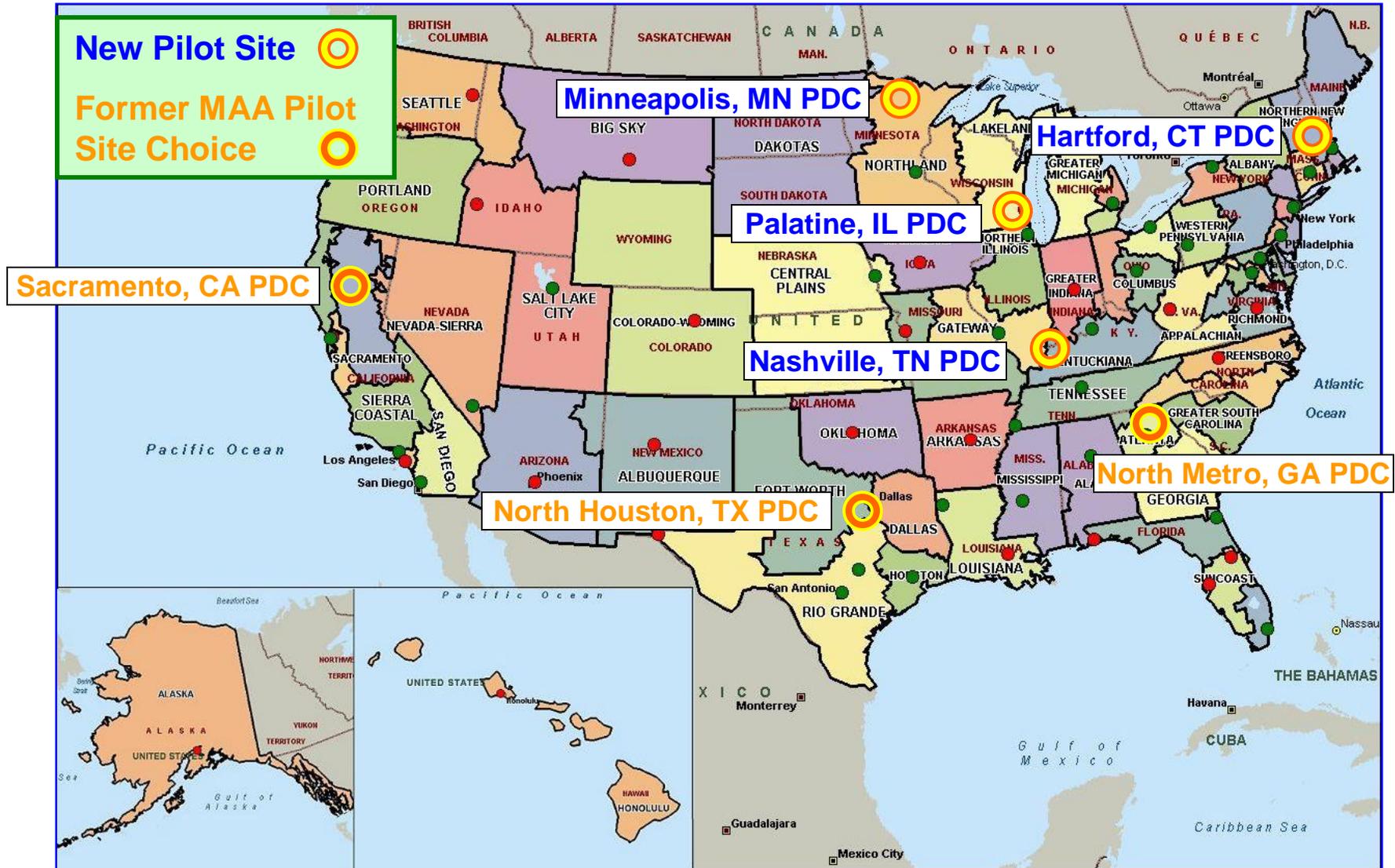
Option 1 and 2 Descriptions

Change Service Requested, Option 1		
	COA, months 1 - 12	Mail is disposed, separate address correction provided.
	COA, months 12+ to 18	Mail is disposed, separate address correction provided.
	Nixie (i.e. undeliverable for reasons other than a move).	Mail is disposed, separate address correction provided.
Change Service Requested, Option 2		
	COA, months 1 - 12	Mail is forwarded , separate address correction provided.
	COA, months 12+ to 18	Mail is disposed, separate address correction provided.
	Nixie (i.e. undeliverable for reasons other than a move).	Mail is disposed, separate address correction provided.

Note: all mail is disposed of and an ACS record provided, except Option 2, with a forwardable COA. Those pieces are forwarded and an ACS record provided.

1. Final PARS site
2. Within top 50% by PARS Volume
3. Within top 50% by PARS Waste Volume
4. Low, Moderate and High Volume Site with Representation across top 50%
5. Recycling Contract in Place
6. More than 1 CIOSS Machine in Place
7. PARS Software Updates in Place for SD Label Intercept Mode
8. Previously Suggested Site by MAA
9. One Location Per USPS Area
10. Level of Mailer Interest and Participation in Pilot

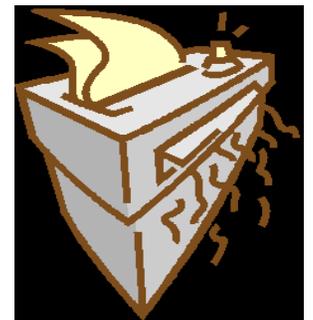
Proposed SD Pilot Sites



IMS 5.5 (i.e. PARS Software Upgrades)

- Pre-beta and Beta Tests - March 9, 2013 to May 4, 2013
- IMS 5.5 Deployment – May 27, 2013 til June 21, 2013

Anticipated start time for SD Pilot Project is July 1, 2013 with a projected end time of September 1, 2013 (i.e. 60 days)



- USPS will use industrial cross-cut shredders
- NAID Max. shred size = width $\frac{3}{4}$ inch x length 2.5 inches
- USPS Max. shred size will be $\frac{1}{4}$ inch x 1 $\frac{7}{8}$ inch
- USPS will also meet international industry standards for Security Level 3 (i.e. confidential documents that should be made illegible)
- Current approach exceeds NAID and equipment can be modified if standards change

Excerpt from the NAID Auditing Criteria

PAPER or PRINTED MEDIA is destroyed by commercial grade destruction equipment with the following OEM specifications or produces particle sizes no larger than those listed below (applicant to check and complete details for all equipment used):

→ STRIP CUT

Continuous Shred:
Width (max): 5/8 inch & Length: Indefinite

Cross Cut or Pierce & Tear: *→ CROSS CUT*
Width (max): 3/4 inch & Length (max): 2.5 inches

Pulverizer, Disintegrator or Hammermill* *→ DISINT*
Screen Size (max): 2-inch diameter holes

Unspecified Equipment
Please describe the type of equipment and cutting mechanism specifications (screen hole size*, blade width, etc.): _____

“Mail sent back for destruction would be considered live mail and part of the mail stream. Therefore, the mailers would be at no greater risk for liability than they are when they drop outgoing mail off for delivery. The Postal Service is a trusted institution that is enshrined in the U.S. Constitution. See U.S. Const. Art. 1, s. 8, cl. 7; 39 U.S.C. s. 101 (The Postal Service is “a basic and fundamental service provided to the people by the Government of the United States, authorized by the Constitution, created by Act of Congress, and supported by the people.”). Therefore, it is difficult to imagine a scenario under which a company would be found liable for entrusting the Postal Service to deliver mail to its final destination, whether that be a mailbox or a shredder located on-site at a USPS facility. Further, the Federal Tort Claims Act (FTCA) includes a specific “postal matter” exception which excludes liability for any “claim arising out of the loss, miscarriage, or negligent transmission of letters or postal matter.” 28 U.S.C. 2680(b). This exception covers USPS employee misappropriation of this information. See *C.D. of NYC, Inc. v. U.S. Postal Service*, 157 Fed. Appx. 428 (2d. Cir. 2005) (USPS not liable for mail stolen by USPS employees).”

*Carrie M. Branson
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After looking into this further, FISMA does not apply to the Postal Service. We comply with it voluntarily as a general rule. However, we are not included in the definition of “agency” in the law.

***The details:* FISMA defines “agency” by cross-reference to the definition of “agency” in the Paperwork Reduction Act (44 USC 3502). See 44 USC 3452(a) . Courts have consistently found that the Postal Service is not an “agency” under the Paperwork Reduction Act definition. See *Kuzma v. USPS*, 798 F.2d 29 (2nd Cir. 1986); *Shane v. Buck*, 658 F.Supp. 908 (D. Utah 1985), *aff’d* 817 F.2d 87 (10th Cir. 1987). The law clearly falls within the scope of 39 USC 410(a), which exempts the Postal Service from laws generally regulating the operation of Federal agencies.**

Status

- **Mailer comments received and survey updated**
- **Basic and Full Service IMB Mailing List Identified**
- **Developing Sampling Methodology that is statistically valid and relevant**
- **Representation from Mailers in Applicable Industry Sectors is key**



USPS Secure Destruction Services Reduce Greenhouse Gas Emissions

Participate and Reduce Your Carbon Footprint!