

Business Reply Mail Operations

AUDIT REPORT

Report Number 23-087-R24 | October 10, 2023

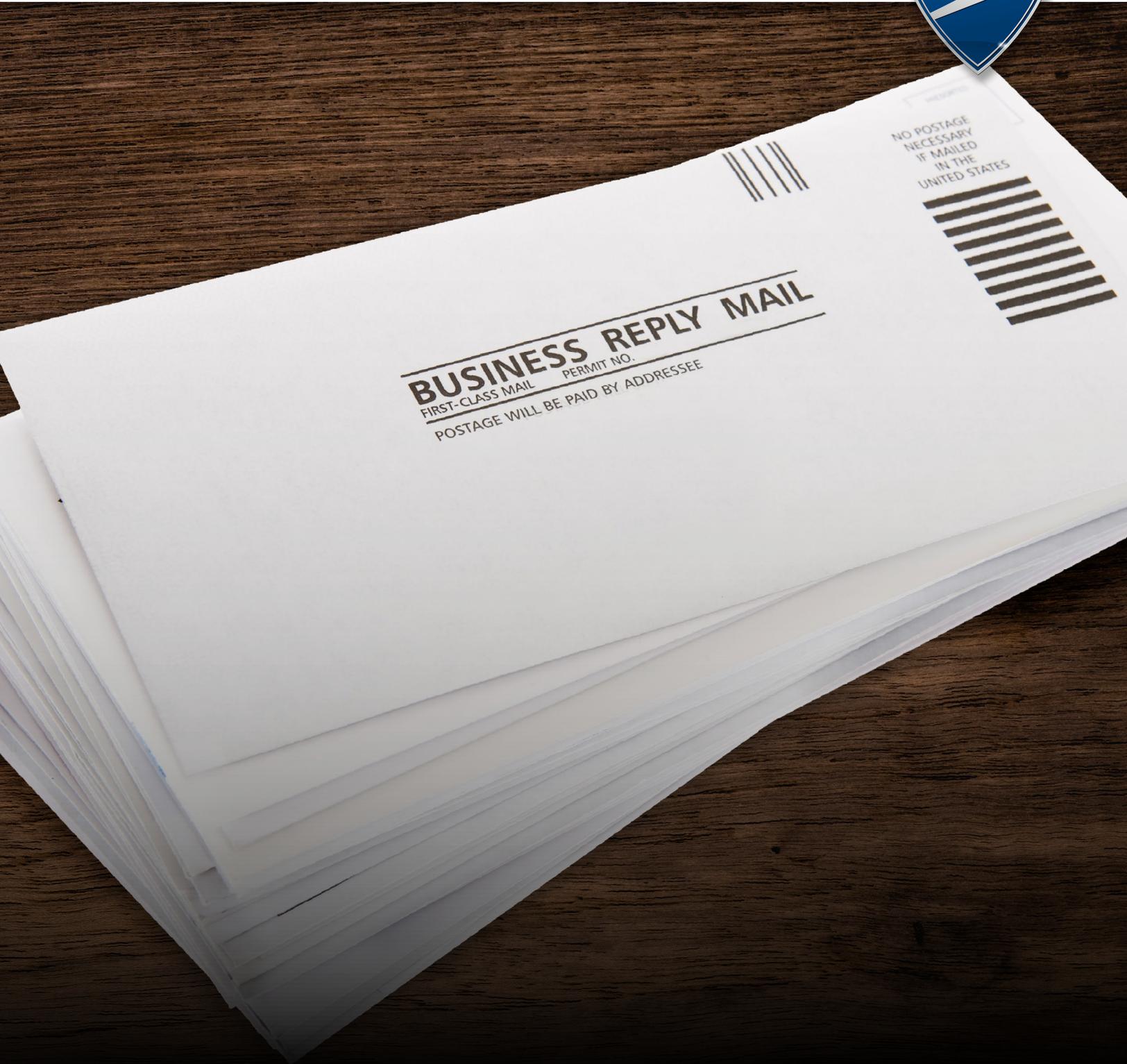


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Highlights

Background

Mailers recently expressed concerns with the timeliness and consistency of the Postal Service's Business Reply Mail (BRM) service, a service which enables qualified mailers to provide a recipient with a convenient, prepaid method for replying to a mailing. The Postal Service processed over 310 million BRM pieces generating \$177 million in revenue in fiscal year 2022. Operationally, BRM is accepted through normal channels (e.g., carrier pick up) then eventually is sent to a local facility, where counting, verifying, billing, delivery (or pick up), and other close-out procedures occur. Effective operations are crucial to ensuring BRM value for the Postal Service, mailers, and customers.

What We Did

Our objective was to evaluate the effectiveness of the Postal Service's BRM operations. We reviewed BRM policies and procedures, analyzed data, observed operations at 11 judgmentally selected sites, and met with Postal Service staff and BRM mailers.

What We Found

Postal Service mailers and their customers value BRM service, but processing delays, insufficient data, and incomplete close-out procedures hinder operational effectiveness and customer satisfaction. We observed BRM delays for nearly 180,000 pieces with some delayed over 13 days at eight of 11 facilities. BRM data was also unreliable as delays were not reported prior to our observations (except at one facility), related workhours were not recorded at 598 sites nationwide, and daily processed and unprocessed volumes were not captured in any system. Finally, required close-out procedures were not consistently completed at nine facilities, resulting in verification and data risks.

Postal Service officials acknowledged these issues and attributed them to staffing and service prioritization challenges, and system limitations. While we recognize those issues, we believe the broader operational effectiveness problems resulted from insufficient management and oversight. The Postal Service began corrective actions and initiated a working group to automate processes and enhance training. Ensuring sufficient management and oversight and enhancing systems will help strengthen BRM value for the Postal Service, mailers, and customers, particularly as untimely processing could delay election mail, nonprofit donations, or other recipient replies.

Recommendations

We recommended management develop strategies to ensure sufficient management and oversight of BRM operations, particularly related to timely processing, recording accurate BRM data (e.g., delays, volumes, and workhours), and completing close-out procedures and complete system enhancements to more effectively track BRM operational data and establish processes for assessing related performance.

Transmittal Letter



OFFICE OF INSPECTOR GENERAL
UNITED STATES POSTAL SERVICE

October 10, 2023

MEMORANDUM FOR: ELVIN MERCADO
VICE PRESIDENT, RETAIL & POST OFFICE OPERATIONS

A handwritten signature in black ink, reading "Amanda H. Stafford", is positioned above the typed name.

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

SUBJECT: Audit Report – Business Reply Mail Operations
(Report Number 23-087-R24)

This report presents the results of our audit of Business Reply Mail Operations.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Josh Bartzen, Director, Retail, or me 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 the Business Reply Mail (BRM) Operations (Project Number 23-087). Our objective was to evaluate the effectiveness of the Postal Service's BRM operations. See [Appendix A](#) for additional information about this audit.

Background

The BRM service enables qualified mailers to provide a recipient with a convenient, prepaid method for replying to a mailing. BRM pieces can include postcards, letters, flats, parcels, or election ballots,¹ and can either be First-Class Mail® or Priority Mail® (see Figure 1). Under BRM, the mailer, not the customer, pays the return postage. The Postal Service processed over 310 million BRM pieces and recorded \$177 million in BRM-related revenue in fiscal year (FY) 2022.

BRM affords benefits to mailers, their customers, and the Postal Service. For mailers, BRM provides postage cost savings on large volumes when a customer response is not assured. BRM also offers the customer greater convenience and cost savings by not needing to pay return postage, supply a mailpiece, or add a return address. BRM is used by:

- Direct marketers seeking to encourage orders.
- Researchers seeking survey response data.
- Publishers soliciting subscriptions.
- Businesses collecting receipts or documents from employees.
- Nonprofit organizations to obtain donations.
- Election officials for mail-in ballots.

The Postal Service receives revenue from the postage on both the outbound piece (to the customer) and on the returned BRM, as well as a per-piece fee on the returned BRM. Mailers must apply for a permit to participate in the BRM program, and there were about 178,000 active permits as of June 2023.²

Figure 1. BRM Examples



Source: U.S. Postal Service Office of Inspector General (OIG) staff.

Many entities throughout the Postal Service network have responsibilities for BRM operations. Local Postal Service staff conduct a variety of pre-mailing BRM program activities, such as reviewing mailer permit applications, assigning the mailer a permit number, and inputting the permit account information into PostalOne!³ Operationally, BRM enters the Postal Service system through typical mail acceptance channels (e.g., such as carriers picking it up along a route or customers dropping it off at a local post office). BRM then flows through the Postal Service's processing network to its destinating facility, such as a post office, delivery unit, or finance station ("unit").⁴ At that destinating unit, Postal Service retail staff — BRM clerks or local management — perform a variety of operations such as:

1 From October 2022 through April 2023, over 13 million completed ballots destined for local election offices were sent through the Postal Service as BRM election mail. Not all election ballots are mailed using BRM, but all completed ballots sent through the Postal Service are processed at a minimum of First-Class service levels.
2 A permit entitles a sender to distribute an unlimited number of BRM pieces and pay per-piece charges only on returned pieces. Permit holders agree to pay an annual permit fee to use this service.
3 PostalOne! is the Postal Service's automated system for managing and recording BRM transactions, including deposits, account balances, volumes, invoices, billing, refunds, and reporting (BRM data for non-PostalOne! units is recorded and traced manually).
4 A post office that accepts mail from customers and offers retail services to customers and handles their mail, but does not offer delivery.

- counting, weighing, and processing arriving BRM, including entering data into PostalOne!;
- calculating the postage that should be collected for the mailing, verifying if the permit account is current and has sufficient funds to pay the applicable postage and fees, and invoicing the cost to the permit account;
- releasing/delivering⁵ BRM to the mailer (this could entail the mailer picking up from their designated unit or being delivered by the carrier) and validating completion through close-out operations; and
- performing daily post-processing documentation and verification actions including:
 - completing the End-of-Day Close-Out report, which documents BRM volumes that were processed, invoiced, and staged.
 - recording any BRM delays⁶ in the Delivery Condition Visualization (DCV) report.
 - recording corresponding BRM-related workhours.

Mailers we recently spoke with expressed concerns with untimely BRM service, including BRM pieces that appeared to be delayed by multiple weeks (based on the cancellation date on the mailpiece or customer complaints). Effective operations are crucial to ensuring BRM value for the Postal Service, mailers, and their customers.

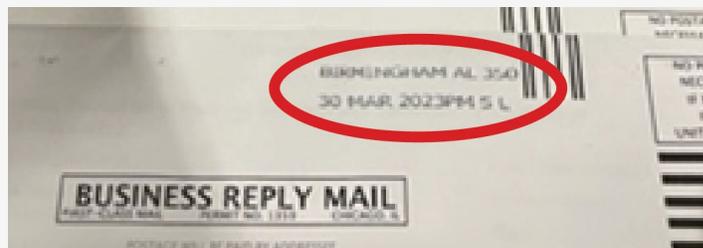
Finding: BRM Operational Effectiveness Could Be Improved

Postal Service mailers and customers value BRM service, but processing delays, insufficient data, and incomplete close-out procedures hinder operational effectiveness and customer satisfaction.

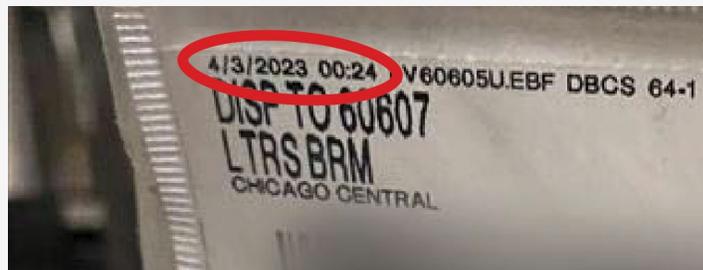
Processing Delays and Data

We observed nearly 180,000 pieces of delayed BRM at eight of 11 facilities we visited, with some pieces delayed by over 13 days (see Figure 2). Management and staff also acknowledged delays prior to our visits, with one office mentioning about 4,000 pieces of delayed BRM election ballots during the previous week.⁷

Figure 2. Examples of Delayed BRM



Example: Piece postmarked March 30, 2023 (8 days prior to OIG team observation)



Example: Letter Tray labelled April 3, 2023 (4 days prior to OIG team observation)

Source: OIG observations at the Chicago Cent Carrier Annex Post Office, IL, and Cardiss Collins Finance Station, IL, on April 7, 2023.

5 BRM mailers with insufficient funds or expired fees will have their mailpieces held at the facility until the account is properly paid. Mailers should be notified that pieces are being held and postal employees should place the transaction in a pending status in PostalOne.

6 BRM received by a unit's established processing cut-off time (i.e., Critical Entry Time [CET]) should be ready for delivery or pick up that day. BRM received after an office's CET is to be processed for delivery or pick up no later than the next business day. When mail arrives prior to the unit's CET but is not ready for delivery or pick up that day, it is considered "delayed" and is required to be reported.

7 Although not processed timely, these ballots were delivered prior to the tabulation of the election results.

To assess the potential magnitude and breadth of observed BRM delays, we contacted major BRM mailers and reviewed Postal Service facility-specific and national data. Mailers we spoke with expressed concerns about the timeliness and inconsistency of BRM service. We also reviewed national and facility-specific delayed mail data in DCV and found service and reliability issues based on the following:

- *Delayed Mail Data Likely Underreported for Facilities Visited.* While we observed nearly 180,000 pieces of delayed BRM during our visits, only one site⁸ had previously reported any delayed BRM volume from October 2022 until the OIG visits in April-May 2023. All other sites had zero reported delays in DCV between October 2022 and our individual visits. As stated earlier, Postal Service policy requires BRM delayed volumes to be accurately recorded in DCV.
- *Delayed Mail Data Likely Underreported Nationally.* Postal Service nationwide DCV data showed 614,351 delayed BRM pieces between October 2022 and June 2023. These numbers were likely understated as 87 percent of those delayed volumes (533,951) were reported between April-June 2023 by only two facilities — Cardiss Collins Finance Station and Chicago Cent Carrier Annex — *after* our visits. Staff at these two facilities acknowledged that prior to our visits, they were not recording delays and started doing so afterward.

Workhour Data

We also found similar data reliability concerns when reviewing BRM-related workhours. National data between October 2022 and June 2023 showed a total of 1.6 million workhours allocated to BRM. These numbers were likely understated as zero (0) workhours were recorded at 598 facilities — facilities that cumulatively processed over 20 million pieces of BRM (10 percent of total BRM volume) during that time. Of those facilities reporting zero work hours from October 2022 through June 2023:

- One facility reported processing 8 million BRM pieces,
- Another facility (one we visited — the Phoenix Main Post Office), reported processing 1.7 million BRM pieces, and

“While we observed nearly 180,000 pieces of delayed BRM during our visits, only one site had previously reported any delayed BRM volume from October 2022 until the OIG visits in April-May 2023.”

- 24 other facilities reported processing over 100,000 pieces.

Close-Outs

We reviewed FY 2023 year-to-date (October 2022–June 2023) national and facility-specific data on the completeness of close-out procedures. Regarding national performance, data showed that nearly 90,000 required close-outs (9 percent)⁹ were not completed. Staff explanations for these incomplete close-outs (10,141 of the nearly 18,600 incomplete close-outs that included an explanation), were attributed to a variety of reasons, including staffing shortages, management oversight issues, and that BRM processing was not a priority. We then reviewed specific data for the facilities we visited and found incomplete close-out procedures at nine of the 10 facilities.¹⁰

Postal Service Perspectives and Impacts

Postal Service officials acknowledged processing delays, delayed volume and workhour data issues, and incomplete close-outs. Local and headquarters management attributed them to staffing, service prioritization, and system limitation challenges as follows:

- *Staffing.* Officials stated that these operational and data shortfalls arose due to staffing constraints, such as not having staff trained or assigned to process BRM when the primary staff was on their day off or on leave. For example, management at nine of 11 facilities we visited did not assign a backup or train other staff to complete BRM processing. In these instances, BRM would not be processed until the primary clerks returned.

⁸ Loop Station (Chicago, IL), which reported 1,495 pieces in mid-March.

⁹ About 90,000 of the expected 928,285 close-outs. Of those 90,000, only 18,600 had narrative explanations for why they were incomplete.

¹⁰ Cardiss Collins Finance Station and Chicago Cent Carrier Annex report closeout data jointly; therefore, we considered these sites as one location (reducing the sites reviewed to 10) for this analysis.

- **Prioritization:** Officials noted that other retail operations and mail processing would oftentimes take priority over timely BRM processing, accurate delayed BRM and workhour tracking, and conducting close-out procedures. We also found that officials at 7 of 11 facilities we visited did not know that delayed BRM should be reported or acknowledged delayed BRM was not reported in DCV.
- **System Limitations:** Officials noted BRM system limitations related to tracking key BRM data necessary to allow management visibility into BRM processing. For example, the system was unable to track the amount of incoming BRM volume arriving at the unit on a given day and compare it to how much was processed. Having the ability to review this information would provide management with more clarity into the amount of delayed BRM and locations having operational issues.

“The Postal Service has already initiated actions to help improve BRM processing, timeliness, and data.”

and oversight for ensuring timely processing, following policies to accurately record delayed mail and workhours, and completing close-out procedures. Continued BRM processing delays, data integrity problems (both delayed mail and workhour data), and system limitations would (1) negatively impact BRM mailer and customer experiences, particularly as untimely processing could delay election mail, nonprofit donations, or other recipient replies; and (2) hinder the Postal Service’s visibility into BRM service and operational performance, including identifying potential operational gaps, weaknesses, or vulnerabilities. Continued close-out deficiencies would result in verification and data risks related to whether BRM operations were completed daily. In conclusion, insufficient management and oversight of BRM operations and system limitations are putting Postal Service revenue, costs, and brand as a trusted service provider at risk.

The Postal Service has already initiated the following actions to help improve BRM processing, timeliness, and data:

- **BRM Workgroup:** The Postal Service and leading BRM mailers created a joint working group¹¹ in April 2023 to focus on BRM issues — such as automating more processes and enhancing training — to increase BRM usage and importance.
- **BRM Mailer Promotion:** The Postal Service announced a May 2023 promotion to help improve BRM efficiency and visibility. The Reply Mail IMbA (Intelligent Mail Barcode Accounting) Promotion provides qualifying mailers discounts if they incorporate static or serialized barcodes into their BRM, which are actions that help automate manual aspects of the counting and invoicing processes.
- **BRM System Enhancements:** By the end of 2023, the Postal Service reports it will implement a dashboard to more effectively track key BRM operational data, including daily arriving and processed volumes.

While we recognize those issues and corrective actions, the broader operational effectiveness problems resulted from insufficient management

Recommendation #1

We recommend the **Vice President, Retail & Post Office Operations**, develop strategies to ensure sufficient management and oversight of Business Reply Mail operations, particularly related to timely processing, recording accurate Business Reply Mail data (e.g., delays, volumes, and workhours), and completing close-out procedures.

Recommendation #2

We recommend the **Vice President, Retail & Post Office Operations**, complete system enhancements to more effectively track Business Reply Mail operational data and establish processes for assessing related performance.

Management’s Comments

Management agreed with the finding and both recommendations, but they disagreed with two anecdotes included in the report. First, where the report mentioned mailers concerns about untimely BRM service, including that some pieces appeared to be delayed by multiple weeks, management requested the statement be removed or reworded as no additional, specific customer information was included. Second, where the report mentioned that BRM operational issues “would negatively impact BRM mailer and customer experiences,

¹¹ Mailers Technical Advisory Committee (MTAC), Work Group #196 – Review Business Reply Mail Processes, Rules and Regulations.

particularly as untimely processing could delay election mail, nonprofit donations, or other recipient replies,” management requested the reference to election mail be removed or adjusted to “mail.” Management felt the intent of the verbiage would create a false sense of alarm, while acknowledging the report stated the observed delayed election mail was delivered prior to the tabulation of any election results.

Regarding recommendation 1, management stated they have already initiated strategies associated with BRM workgroups, dashboards, and system enhancements to improve timeliness of BRM processing and accuracy of BRM volume, workhours and processing delays, and close-out procedures. In subsequent discussions, management further clarified these ongoing strategies, stating they will perform better oversight of timely processing, more accurately allocate workhours and compare them to workload, and enhance visibility into BRM delays and close out performance.

Regarding recommendation 2, management stated they are finalizing the development of the BRM dashboard, which will more effectively track operational data and performance. The target implementation date is January 31, 2024.

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

Evaluation of Management’s Comments

The OIG considers management’s comments responsive to both recommendations, and corrective actions should resolve the issues identified in the report.

Regarding management’s disagreement with the report’s description of mailer concerns about delayed BRM, we chose to summarize mailer BRM concerns while appropriately retaining the anonymity of individual mailers. Regarding management’s disagreement with the report’s description of potential election mail delays resulting from BRM operational issues, we are retaining this verbiage based on election mail being a key BRM segment and Postal Service staff acknowledging associated delays during our observations.

All recommendations require OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. With OIG’s review of supporting documentation around the Postal Service’s newly developed

strategies associated with BRM workgroups, dashboards, and system enhancements, we agree to close recommendation 1 as implemented upon the report’s issuance. Recommendation 2 should not be closed in the Postal Service’s follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed.

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BUSINESS REPLY MAIL
FIRST CLASS MAIL PERMIT NO.
POSTAGE WILL BE PAID BY ADDRESSEE

Appendix A: Additional Information

Scope and Methodology

Our objective was to evaluate the effectiveness of the Postal Service’s BRM operations. To accomplish our objective, we:

- Reviewed Postal Service policies and procedures related to BRM operations (e.g., processing, handling, invoicing, etc.).
- Analyzed BRM operational data from PostalOne! for FY 2022 and year-to-date FY 2023 (June), including volumes, BRM active permits, and the number of days BRM transactions were not processed by location.
- Analyzed nationwide delayed BRM from the DCV report, housed within Informed Visibility, from October 2022 through June 2023.
- Analyzed BRM close-out compliance, causes for noncompliance, and BRM associated workhours nationally for October 2022 through June 2023 from the Postal Service’s Enterprise Data Warehouse/Application System Reporting systems.
- Conducted on-site observations of BRM operations at 11 judgmentally selected facilities

nationwide that encompassed all four delivery and retail areas, large BRM volume locations, and nearby smaller volume locations. See Table 1 for the facilities visited, Postal Service Area, and observation dates.

During these site visits, we determined the amount of BRM on hand (current and pending), assessed its processing timeliness, interviewed BRM staff and management, and observed staff completing the processing and invoicing of BRM transactions.

Reviewed data from the Postal Service’s Customer 360 system to learn about instances where customers raised issues or concerns about BRM operations and service.

Interviewed Postal Service headquarters officials about pertinent issues relating to BRM operations including challenges with BRM operations and actions the Postal Service plans to take or has taken to address them.

Interviewed judgmentally selected BRM mailers to discuss their BRM operations, issues at Postal Service locations, how they monitor their BRM, and their overall Postal Service interactions.

Table 1. Sites and Dates Visited to Observe BRM Operations

Area	Facility	Date Attended
Central Area Retail and Delivery Operations	Joliet, IL, Post Office	April 6, 2023
	Cardiss Collins Finance Station	April 7, 2023
	Chicago Cent Carrier Annex	April 7, 2023
	Loop Carrier Annex	April 7, 2023
Atlantic Area Retail and Delivery Operations	Lanham-Seabrook, MD, Post Office	May 9, 2023
	Hagerstown, MD, Post Office	May 10, 2023
Southern Area Retail and Delivery Operations	Doraville, GA, Post Office	May 11, 2023
WestPac Area Retail and Delivery Operations	Phoenix, AZ, Main Post Office	May 18, 2023
	Phoenix, AZ, Cactus Post Office	May 18, 2023
Central Area Retail and Delivery Operations	Dayton, OH, Main Post Office	May 23, 2023
	Cincinnati, OH, Main Post Office	May 24, 2023

Source: Facilities Database and OIG-generated based on-site observations and dates attended.

We conducted this performance audit from April through October 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 finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective. We discussed our observations and conclusions with management on September 8, 2023, and included their comments where appropriate.

In planning and conducting the audit, we obtained an understanding of the internal control structure related to BRM to help determine the nature, timing, and extent of our audit procedures. We reviewed the management controls for overseeing the program 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 significant internal control deficiencies within the context of our objective. Our recommendations, if implemented, should correct the weaknesses we identified for future programs.

We assessed the reliability of computer-generated data from the PostalOne!, Informed Visibility, Enterprise Data Warehouse, Application System Reporting, Facilities Database, and Customer 360 systems when performing our data analysis. We assessed the reliability of the data by discussing the data with headquarters and Post Office management who use this data to oversee operations and performance. We determined the data were sufficiently reliable for the purpose of this report.

Prior Audit Coverage

The OIG did not identify any prior audits or reviews related to the objective of this audit within the last five years.

Appendix B: Management's Comments

ELVIN MERCADO
VICE PRESIDENT, RETAIL AND POST OFFICE OPERATIONS
HEADQUARTERS



October 2, 2023

JOHN CIHOTA
DIRECTOR, AUDIT SERVICES

SUBJECT: Management Response: Business Reply Mail (BRM) Operations
(23-087-DRAFT)

Thank you for providing the Postal Service with an opportunity to review and comment on the findings and recommendations contained in the draft report — *Business Reply Mail Operations*.

Finding #1: BRM Operational Effectiveness Could Be Improved:

While Management agrees with Finding #1 as a whole, it disagrees with two anecdotal statements made in the audit report:

1. The report states, "Mailers we recently spoke with expressed concerns with untimely BRM service, including BRM pieces that *appeared* to be delayed by multiple weeks (based on the cancellation date on the mail piece or customer complaints)." Management had requested the statement be removed or reworded, as no specific information was provided to the Postal Service relating to comments shared by customers with the Office of Inspector General (OIG).
2. The report states, "Continued BRM processing delays, data integrity problems (both delayed mail and workhour data), and system limitations would negatively impact BRM mailer and customer experiences, particularly as untimely processing could delay election mail, nonprofit donations, or other recipient replies." Management had requested the reference to election mail be removed or replaced with simply the word "mail." Management felt the intent of the current verbiage was to create a false sense of alarm, despite the fact all Election Mail referenced in the report was delivered prior to the tabulation of any election results.

Following are Management's comments on the two (2) recommendations:

Recommendation #1:

We recommend the Vice President, Retail & Post Office Operations, develop strategies to ensure sufficient management and oversight of Business Reply Mail operations, particularly related to timely processing, recording accurate Business Reply Mail data (e.g., delays, volumes, and workhours), and completing close-out procedures.

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WASHINGTON DC 20260

Management Response/Action Plan:

Management agrees with this recommendation. The Postal Service has already initiated the following strategies acknowledged by the OIG in its report to improve timeliness of BRM processing, accuracy of BRM volume, workhours and processing delays, and close-out procedures.

- BRM Workgroups to automate more processes and enhance training.
- BRM Dashboard to enhance visibility and effectively track key BRM operational data.
- BRM System Enhancements.

Therefore, Management requests closure of this recommendation.

Target Implementation Date: N/A

Responsible Official: N/A

Recommendation #2:

We recommend the Vice President, Retail & Post Office Operations, complete system enhancements to more effectively track Business Reply Mail operational data and establish processes for assessing related performance.

Management Response/Action Plan:

Management agrees with this recommendation. Management is finalizing the development of the BRM dashboard, which will more effectively track operational data and Business Reply performance.

Target Implementation Date: 01/31/2024

Responsible Official: Manager, Retail & Post Office Operations

E-SIGNED by TRACY.R RAYMOND
on 2023-10-02 15:14:59 EDT

Tracy R. Raymond
on behalf of Elvin Mercado

OFFICE OF INSPECTOR GENERAL

UNITED STATES



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