

# Secure Destruction

## Mailers Technical Advisory Committee

August 20, 2014

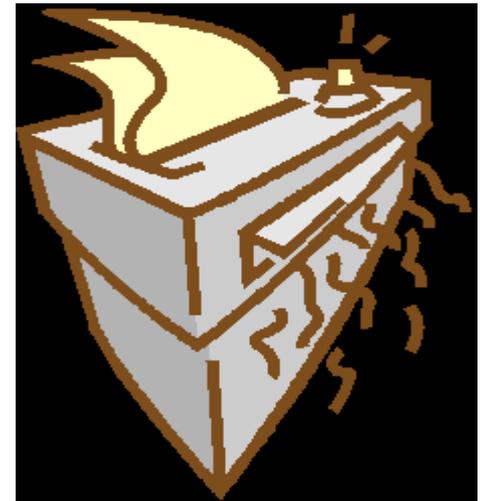
Thomas G. Day  
Chief Sustainability Officer



**USPS BlueEarth™**  
Secure Destruction



- **Secure Destruction describes a new mail program 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.**



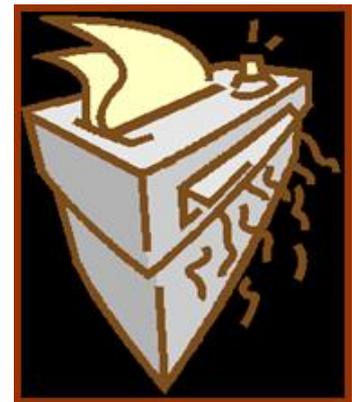
## Types of Records

- **Health**
- **Financial**
- **Consumer**
- **Government**
- **Credit card**
- **Personal records that would create liabilities**
- **Others – under market study**

## Target Industry Sectors

- **Banking**
- **Credit card companies**
- **Healthcare**
- **Phone & utility services**
- **Investment firms**
- **Government agencies and contractors**
- **Legal services**

- **Savings to mailers by reducing costs of receiving, handling, and destroying RTS mail with Privacy Protected Information (PPI)**
- **Savings to USPS by reducing the amount of Return to Sender (RTS) mail that needs to be processed, transported, and delivered to mailers**



## Handling Procedures

- Mail follows normal mail processing flow until identified as Undeliverable As Addressed (UAA)
- First-Class UAA letter mail is isolated when processed on Postal Automated Redirection System (PARS)



## Handling Procedures

- Notification of treatment is sent to mailer via ACS™ fulfillment
- Sorted to special bin for verification



## Verification Procedures

- Processing clerk manually scans all mail sorted to secure disposal bin to validate proper sortation
- Existing internal security measures, as is true with all mail
- Until shredded, it is still mail



- Each plant receives two shredders, a primary and a backup
- Shredders are to be used only for  
Secure Destruction



- 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):

- Continuous Shred: *→ STRIP CUT*  
Width (max):  $\frac{5}{8}$  inch & Length: Indefinite
- Cross Cut or Pierce & Tear: *→ CROSS CUT*  
Width (max):  $\frac{3}{4}$  inch & Length (max): 2.5 inches
- Pulverizer, Disintegrator or Hammermill\* *→ DISINTEGRATE*  
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  
Chief Counsel, Torts  
USPS Law Department*

**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.**

## **Electronic Notification = Two Part Process\***

- 1. Notification of treatment is sent to mailer via ACS™ fulfillment**
- 2. Secure Destruction Data associated with the IMb® (Note: Name/Address data already associated with IMb®), as well as event data. The event data (i.e. facility name, date and time) from CIOSS will indicate when the letter was separated for destruction  
Secure Destruction Data will be provided in a second report, not linked to ACS.**

**\* Note: All Secure Destruction data will be made available on the Electronic Product Fulfillment (EPF) website; which is the secure website mailers currently use to get ACS data.**

- Mailer must participate in Traditional ACS™, OneCode ACS® or Full-Service ACS with an IM barcode to receive notice of disposed mailpieces
- Mail must bear Intelligent Mail® barcode containing a Secure Destruction Service Type ID



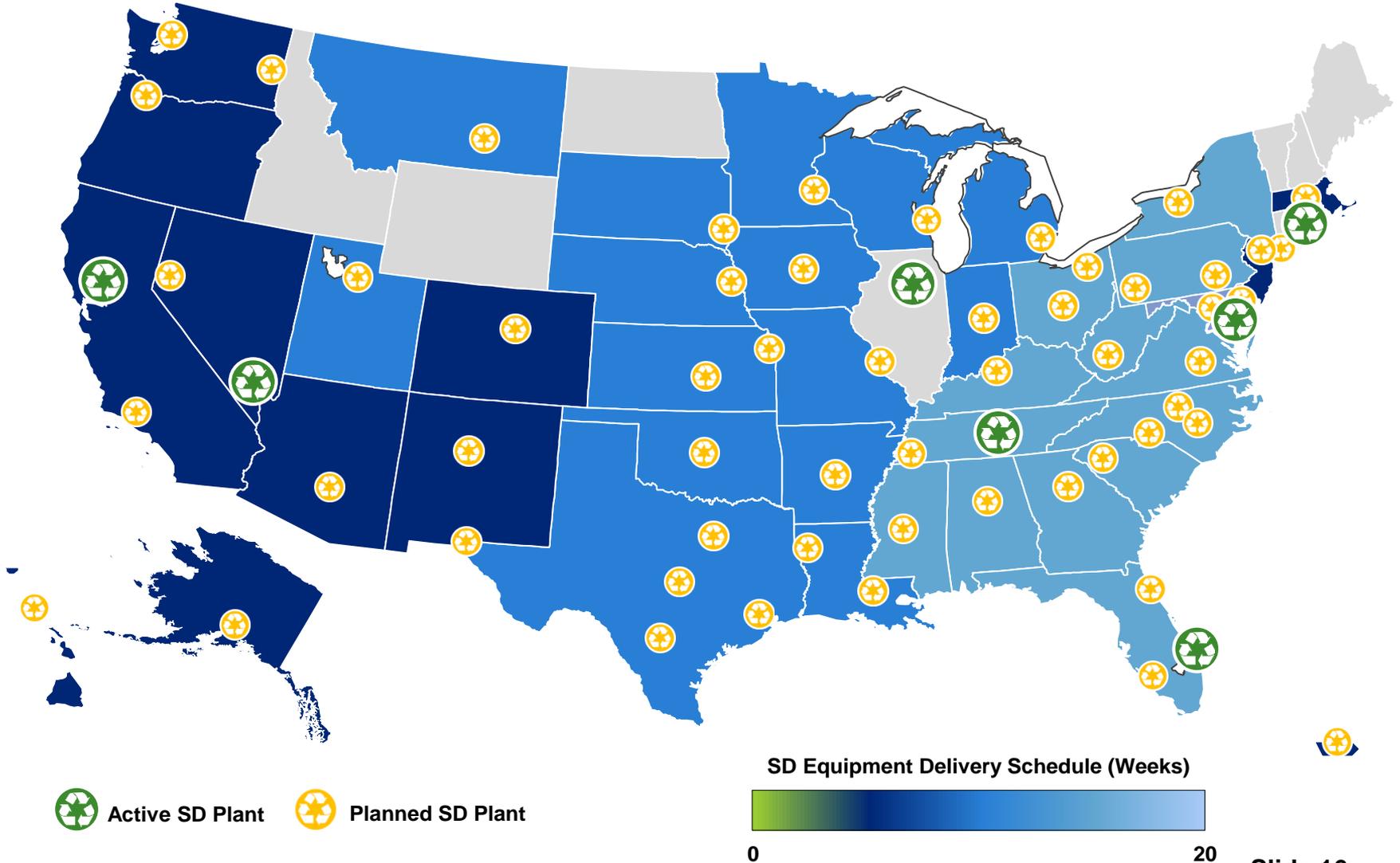
## Secure Destruction Service Type

Class of Mail	Address Correction Option	Basic or Nonauto option w/o IMb Tracing™	Basic or Nonauto option with IMb Tracing	Full- Service w/o IMb Tracing	Full- Service with IMb Tracing
First-Class Mail®	Traditional ACS™ – CSR1 SD	528	527	523	525
	Traditional ACS – CSR2 SD	531	526	533	532
	OneCode ACS – CSR 1 SD	520	518		
	OneCode ACS – CSR 2 SD	315	321		
	Full-Service ACS – CSR 1 SD			524	522
	Full-Service ACS – CSR 2 SD			335	331

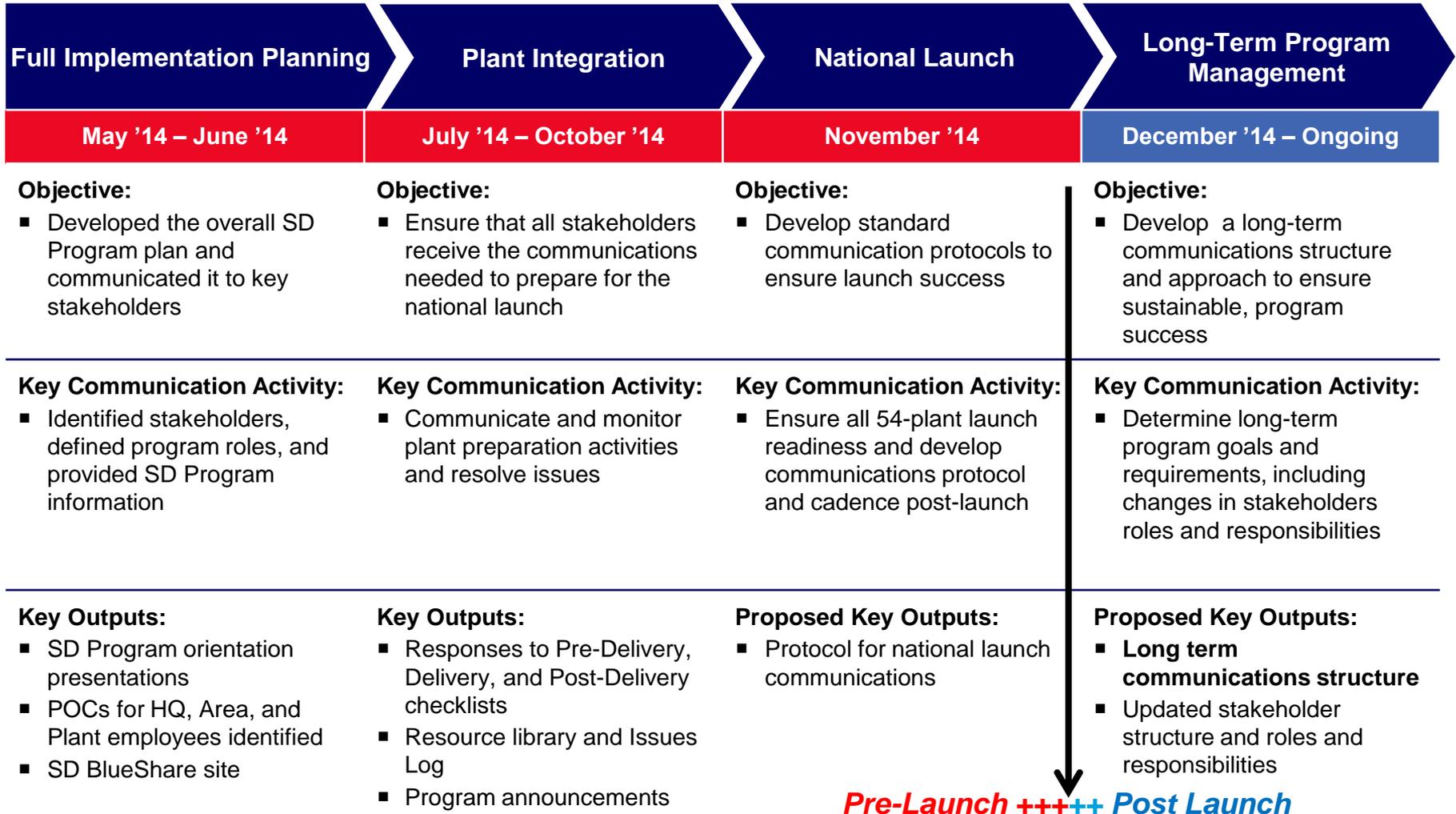
- Providing a service and savings resulting in a win-win for mailers and the Postal Service



Leading up to the national launch on November 18, there will be staggered deliveries of the SD equipment to all planned SD plants



The SD Program is divided into four phases, each with its own objective, key communication activities, and outputs



# Questions

