

# United States Postal Service

## Response to OMB's DRAFT HSPD-12 Implementation Guidance

The United States Postal Service (USPS) appreciates the opportunity to comment on the draft Homeland Security Presidential Directive-12 (HSPD-12) Guidance. The Guidance provides important information to support implementation of HSPD-12. Due to the significance of the Directive, the Postal Service has begun work to develop a plan to provide its employees and contractors with identification credentials consistent with HSPD-12 and the Postal Service's unique status within the federal government.

HSPD-12 touches a number of areas in which the Postal Reorganization Act provides the Postal Service authority and obligations independent of those covering departments and agencies. Several statutes that apply to agencies generally do not apply to the Postal Service. This is true, for example, in the areas of human resources and labor relations, purchasing, and records management. HSPD-12 can be expected to impact each of these areas either directly or indirectly. Since the Postal Service has developed separate systems over the past 33 years, flexibility in the implementation of this program is needed to prevent adverse effect.

Due to its unique status, the Postal Service believes that the draft Guidance should be amended to include the Postal Service among the entities listed in response to question 1(A) that are encouraged, but not required to comply with HSPD-12. This distinction will not undermine the work the Postal Service has begun to provide its employees and contractors identification credentials consistent with HSPD-12. In fact, the effort to voluntarily comply with HSPD-12 received consideration by the Postal Service prior to the publication of the draft Guidance. However, the distinction will accomplish the important objective of clarifying that the Postal Service efforts to achieve the important objectives of HSPD-12 will take place consistent with its unique status.