



**Standards Board**

**DATA & CODE DEFINITION GROUP**

Brussels, 19 March 2004

(Agenda item 6)

**S34 - international mail processing centres**

Document by IPC

<b>1 Subject</b>	<b>References/Paragraphs</b>
<p>S34 defines the mechanism for assigning facility/location identifiers to mail processing centres that are involved in the handling of inter-administration mail. It has already been the subject of modifications designed to ensure that code allocation requests are operationally justified. Nevertheless, suggestions have arisen that further limitations are required to prevent the allocation of codes to facilities that are not authorised to operate as IMPCs.</p> <p>This document summarises some of the issues involved and outlines a proposal for modification of S34 that would address these issues without involving the DCG, or its CAM, in policing the legality of IMPCs.</p>	1 - 7
<p><b>2 Decisions expected</b></p> <p>The DCG is requested to:</p> <ul style="list-style-type: none"><li>a) discuss the issues relating to the allocation of IMPC codes;</li><li>b) identify any need for the IB to obtain, from the CA and/or POC, clarification of the conditions under which it/the CAM is authorised to allocate IMPC codes;</li><li>c) consider the suggestions herein regarding the further modification of S34 and, if thought appropriate, commission the development of detailed revision proposals.</li></ul>	8

**I. Background**

1. UPU standard S34 defines the mechanism for assigning facility/location identifiers to mail processing centres that are involved in the handling of inter-administration mail. These identifiers, maintained in a UPU-defined code list (code list 108) are then used on UPU forms and in EDI messages as a 'shorthand' way of referencing the facility concerned. They are also used in S8 despatch identifiers and in S9 aggregate (receptacle content) identifiers both as part of the mechanism for ensuring the uniqueness of these and, in the case of S9, to provide routing information that may be used by any party which captures the bar coded value. This last capability is supported by the fact that S34 identifier values include the UN/LOCODE which corresponds with the locality in which the facility is situated.

## **II. Issues with S34**

2. Though intended as a simple mechanism for controlling the allocation of UPU-defined facility/location identification codes, S34 has had to be the subject of frequent modifications due to the propensity of some postal operators to request code allocations for purposes not covered by the original intent of the specification. Such requests have involved applications whose apparent intent was to exhaust all possible code allocations associated with particular UN/LOCODE values; applications for codes based on UN/LOCODE localities other than that in which the facility was actually located and applications for multiple codes, for individual facilities, occasioned by the lack of support, in other existing standards and procedures, for adequate segregation of mailstreams.

3. To prevent abuse, the DCG has introduced progressively more restrictions and information requirements into the specification, to provide the CAM with both the information needed to assess the intent behind code applications and the mechanism to refer applications that lack adequate justification for further consideration by the DCG and/or Standards Board.

4. More recently, questions about S34 have also arisen in relation to the question of ETOEs and their legality, with suggestions being made that S34 codes should only be allocated to facilities that are properly authorised by UPU Member States and that existing codes allocated to certain ETOEs should be withdrawn. In this context, Council of Administration resolution CA 2/2003 establishes that any UPU member country seeking to establish an ETOE is required to obtain the agreement of the host country of the ETOE in accordance with the host country's legislation.

5. This led (meeting 2003-4 Doc 10) to the suggestion that the DCG and its CAM should be involved in policing the execution of CA 2/2003 by requiring certain applicants for S34 code values to provide evidence of their authorisation to operate an IMPC in the territory for which an IMPC code was being requested. The DCG rejected such involvement, insisting that the International Bureau should decide on the legal admissibility of code allocation requests either before, or independently of, the allocation of S34 code value(s) by the CAM.

6. This position was effectively endorsed by the Standards Board in its meeting 2004-1 statement of standards policy, which was subsequently endorsed by the POC.

## **III. Proposed approach**

7. There nevertheless remain valid questions for the DCG to address: although the allocation of S34 codes is not, and should not, be linked to legal questions, there is little point in allocating codes to (or reserving code allocations for) facilities that are not, in practice, allowed to operate. A possible approach, which does not involve the DCG or its CAM in explicit policing operations, would be to modify S34 to:

- require (future) applicants to make signed written applications for IMPC codes, with the application form including a declaration, by the applicant, that it has obtained all authorisations, in accordance with the laws of the country in which the IMPC is situated, required for it to operate the IMPC concerned;
- support the suspension (i.e. temporary marking as not authorised for use) and/or withdrawal of an allocated code value in the event that the code concerned:
  - was obtained through the making of an application that is subsequently shown to contain factual inaccuracies, the nature of which is such that, had correct information been provided, the code concerned would not have been allocated or would have required authorisation of a higher-level organ (such as the SB itself);
  - does not enter into use by the date indicated in the application or within a reasonable period thereafter;
  - ceases to be used in practice and remains unused for a period in excess of 6 calendar months;

- relates to an IMPC for which the operating authorisation is subsequently withdrawn or determined, by a competent court, to be invalid or non-existent.

#### **IV. Action requested of the DCG**

##### **8. The DCG is requested to:**

- a) discuss the issues relating to the allocation of IMPC codes;**
- b) identify any need for the IB to obtain, from the CA and/or POC, clarification of the conditions under which it is authorised to allocate IMPC codes;**
- c) consider the above suggestions for further modification of S34 and, if thought appropriate, commission the development of detailed revision proposals.**