



*United States Department of Homeland Security*  
TRANSPORTATION SECURITY ADMINISTRATION  
TRANSPORTATION SECTOR NETWORK MANAGEMENT  
AIR CARGO PROGRAMS

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**SHIPPERS/INDIRECT AIR CARRIERS (IAC's) UTILIZING UNIVERSAL POSTAL UNION (UPU) DOCUMENTATION TO TENDER SHIPMENTS FROM EXTRATERRITORIAL OFFICES OF EXCHANGE (ETOE's) DIRECTLY TO AIRLINES**

Recently, the Transportation Security Administration (TSA) conducted several air cargo security assessments of Indirect Air Carriers, Air Carriers, and ETOEs, tendering Air Cargo to Air Carriers utilizing CN38 type documentation of the Universal Postal Union instead of commercial airway bills.

An ETOE is defined by the UPU as an office or facility operated by, or in connection with, a postal operator outside its national territory, on the territory of another country. These offices are established by postal operators for commercial purposes to draw business in markets outside their own national territory. A few examples of the more than 20 ETOEs located in the U.S. include Sweden Post (Direct Link) in Chicago and several other cities, and Germany's Deutsche Post (DHL-Global and Smart Mail) in Chicago, New York/Newark, and Los Angeles.

The 2004 Bucharest UPU Congress decided the items that originate from ETOEs are strictly commercial items not covered by the provisions of the UPU convention, unless the laws or policies of the origin and destination country allow ETOE traffic to be considered as international mail covered by these provisions.

U.S. policy regarding outbound ETOE traffic is posted on the Department of State website (<http://www.state.gov/p/io/ipp/usgdoc/65178.htm>): It is the policy of the U.S. Government that the UPU Acts do not apply to ETOE commercial operations in the United States, and that accordingly ETOEs must not use UPU documentation (CN38s). According to this policy, an entity other than the U.S. Postal Service must not export mail matter from the United States to other countries using UPU documentation (CN38s) or U.S. Postal Service equipment or customs forms.

Therefore, cargo from ETOEs within the U.S.A. must be handled the same as any other commercial cargo and comply with all TSA security requirements. Questions related to this information should be directed to Thomas M. Friedman, ([Thomas.Friedman@dhs.gov](mailto:Thomas.Friedman@dhs.gov)) TSA HQ Regional IAC Representative,.