

TITLE: Postal Regulatory Commission Compliance Plan for OMB Memorandum M-25-21 – September 2025

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1. Driving AI Innovation

Removing Barriers to the Responsible Use of AI

- The Commission is a micro-agency with a limited staff; however, we have developed processes and policies to allow for the responsible use of AI, including the requirement for use case development and approval through a governance board. Currently, we have established an AI working group to develop use cases and proposed uses for AI tools. This will help grow the adoption of AI responsibly.

Sharing and Reuse

- As the Commission is a small agency, we intend to identify commercial tools that can be used for multiple use cases throughout our agency. We intend to procure only a few tools that can be segregated and used for multiple purposes.

AI Talent

- We have yet to identify specific resources required for additional AI talent. We have provided training for our Office of General Counsel on the two legal AI research tools already in use and have established a working group to develop requirements for other potential use cases.

2. Improving AI Governance

AI Governance Board

- As we are not a CFO agency, we have a very small AI Governance Board that is chaired by the CAIO and includes the CISO, Privacy Officer, Records Manager, CIO, and Legal.

Agency Policies

- We are currently updating our policies on generative AI and on AI procurement. In addition, we hope to develop use case templates to allow program offices to document their AI requests and provide all required information for AI governance.

CUI

We are in the process of issuing a comprehensive AI policy that will include everything from acquiring AI to use of AI tools. Our policy will include a governance process for all controlled unclassified information (CUI) . In addition, we are working on new processes to tag our CUI so that it can be properly protected.

AI Use Case Inventory

- As we are a micro agency, our AI Use Case Inventory will be compiled directly through our Chief Artificial Intelligence Officer.

3. Fostering Public Trust in Federal Use of AI

Determinations of Presumed High-Impact AI

- The Chief AI Officer will review each use case that will use AI. Any AI use case that involves non-public information will receive a review from the governance board to determine if the use case meets the requirements of High-Impact AI as outlined in OMB Memo 25-21.
- The Chief AI Officer will make all waiver determination on minimum risk requirements. Those waivers will be tracked and monitored by the Chief AI Officer. The Agency will develop a monitoring plan for all High-Impact AI to be implemented by the program office with regular reports to the Chief AI Officer.

Implementation of Risk Management Practices and Termination of Non-Compliant AI

- Based on the Commission's mission it is unlikely that the Commission will have many use cases for high impact AI and at this time does not plan on implementing any waivers for the minimal risk requirements. If a use case does contain High-Impact AI, the Chief AI Officer and the governance board will develop a specific plan to implement risk management processes. Any non-compliant AI will be prohibited from the Commission's network until it can be compliant with the minimum risk requirements or the requirements of any waivers.