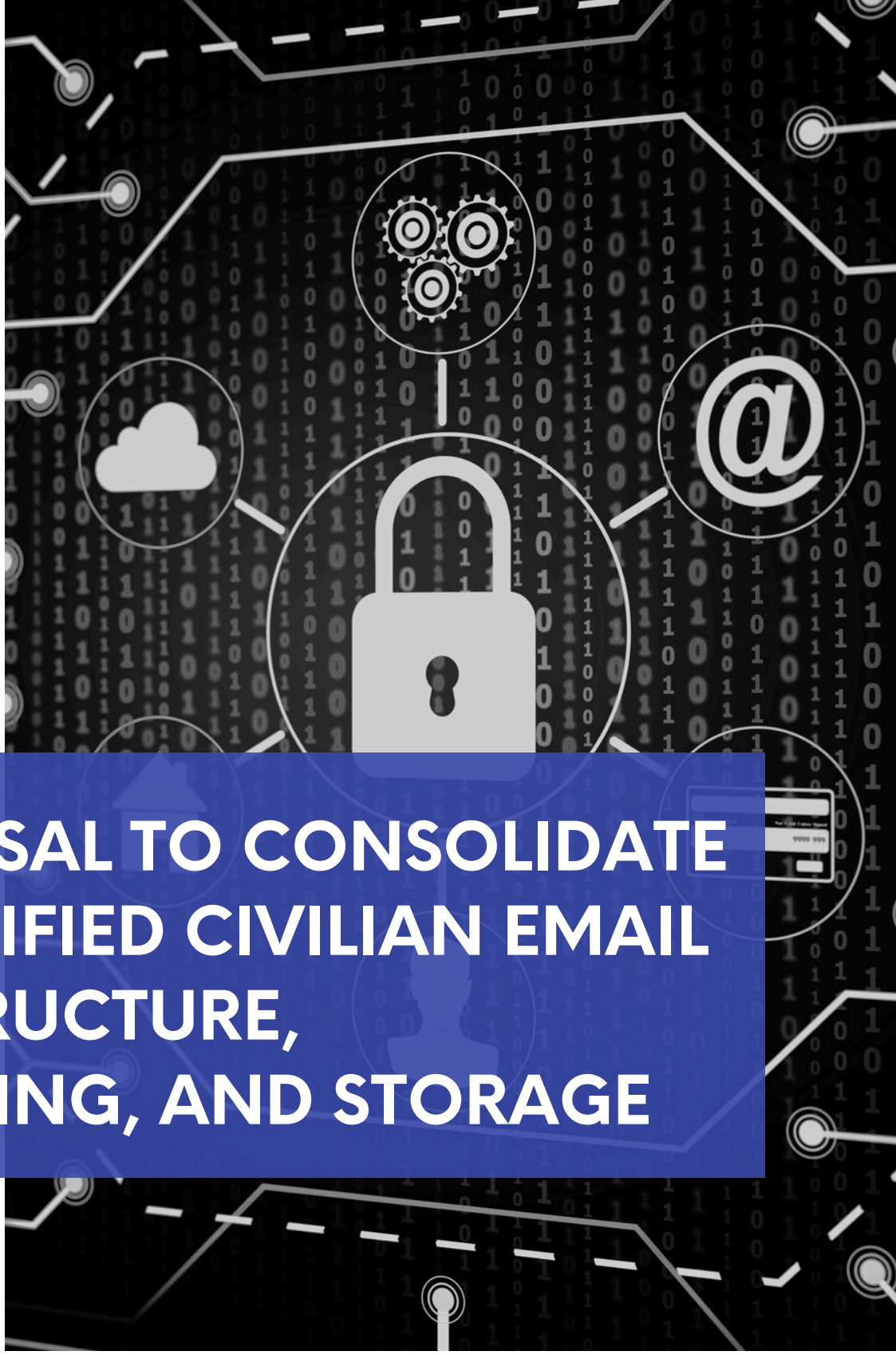
MARCH 2026



A PROPOSAL TO CONSOLIDATE UNCLASSIFIED CIVILIAN EMAIL INFRASTRUCTURE, PROCESSING, AND STORAGE

THE COUNCIL TO MODERNIZE GOVERNANCE

Anthony Adkison
Curtis M. Schube, J.D.

A PROPOSAL TO CONSOLIDATE UNCLASSIFIED CIVILIAN EMAIL INFRASTRUCTURE, PROCESSING, AND STORAGE

ISSUE: Federal agencies typically maintain standalone email enterprise systems,[1] along with an army of IT employees to maintain them. Additionally, all federal email systems require reliable security against increasingly sophisticated cyberattacks, ready access for authorized users, and consistent protocols for the retention of federal records. The multiplicity of these systems results in increased costs due to redundancies and inefficiencies. It also hampers compliance with legal requests for records of email communications. Might these and other issues be addressed by consolidating enterprise email systems within a single federal entity?

PROPOSAL: Issue an executive order directing all executive agencies, other than the Department of War (DoW), to migrate unclassified email systems to a single, cloud-based email system, to be managed by a newly established entity called the "Data Services Administration" (DSA) within the General Services Administration (GSA).

BACKGROUND

Email, although ubiquitous today, was only developed in an early form at MIT in 1965.[2] Current estimates put the number of email accounts worldwide at well over four billion.[3]

Use of email by the approximately three million people employed in the federal government is extensive.[4] Assuming each employee uses two email addresses to perform their job, the federal government manages approximately six million email addresses. Although this may appear to be a huge amount of email for a single federal entity to manage, Google's Gmail platform manages two *billion* email accounts.[5]

The consolidation proposed here is limited to non-classified, non-Department of War civilian email, which further reduces the number of emails to be managed by

---

[1] Enterprise IT systems (sometimes referred to as commodity IT systems), a term of art within the IT community, includes those aspects of email operations that can be centrally provided and secured, are not mission-specific, are used by every agency, can be standardized, benefit from economies of scale, and do not require statutory authority. See e.g., Office of Management and Budget. Report to the President on Federal IT Modernization, (Washington, DC: Executive Office of the President, 2017), 18, https://nsarchive.gwu.edu/sites/default/files/documents/4111499/The-White-House-Report-to-the-President-on.pdf.

[2] Tom Van Vleck, "Anecdotes," IEEE Annals of the History of Computing 34, no. 1 (January–March 2012): 4–6, https://www.multicians.org/thvv/anhc-34-1-anec.html.

[3] Ivan Blagojevic, "10 Email User Statistics on User Base," 99firms, August 5, 2025, https://99firms.com/research/how-many-email-users-are-there/#gref.

[4] "How Many People Work for the Federal Government?," USAFacts, November 12, 2025, https://usafacts.org/articles/how-many-people-work-for-the-federal-government/.

[5] Naveen Kumar, "Gmail Statistics (2026): Users by Country & Market Share," DemandSage, January 6, 2026, https://www.demandsage.com/gmail-statistics/.

DSA. As such, technology would not impose an impediment to the development of a single email enterprise management system. Finally, federal agencies exist to conduct their missions, and IT is supposed to be a useful tool to support that mission. Consolidation of email enterprise systems would allow DSA to support agencies by managing common IT functions across agencies, thereby freeing them to focus more fully on their mission.

DOW's EXPERIENCE WITH EMAIL CONSOLIDATION SUPPORTS THE FEASIBILITY OF THIS PROPOSAL

An early effort at email consolidation was undertaken by the DoW—the Department of Defense (DoD) at the time—beginning in the 2010s. Notably, DoD's efforts at consolidation appear to have required no specific enabling legislation but were the result of policy decisions and federal IT modernization efforts.[6]

The DoW began its email migration in October 2010, when the Army teamed with the Defense Information Systems Agency to develop DoD's Enterprise Email (DEE) system.[7] DEE was designed to be the first step in a department-wide, centrally managed, secure email system.[8] Advantages of DEE included fewer servers and administrators and the elimination of unnecessary seams between thousands of different local networks, resulting in enhanced security.[9] DEE also provided uniform protocols, single-use email addresses that could migrate with the user, and a universal database accessible from remote locations.[10]

By September 2013, the Army had completed migration of nearly 1.5 million users to DEE and, at its peak, DEE had an email user base of 1.8 million and mobile cell phone access for more than 80,000 users.[11] The Army Audit Agency confirmed savings of approximately $78 million per year, *exclusive of payrolls costs*, resulting from the reduction or elimination of redundancies in enterprise email

---

[6] See e.g., U.S. Department of Defense, DoD Instruction 8170.01: Online Information Management and Electronic Messaging, (January 2, 2019), https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/817001p.pdf; U.S. Department of Defense, DoD Directive 5144.02: Online Information Management and Electronic Messaging, (March 12, 2025), https://www.esd.whs.mil/portals/54/documents/dd/issuances/dodd/514402p.pdf.

[7] Department of the Navy Chief Information Officer, "DISA Eyes a Cloud-Focused Future with DoD Enterprise Email Decommission," CHIPS Magazine, accessed February 19, 2026, https://www.doncio.navy.mil/CHIPS/ArticleDetails.aspx.

[8] Department of the Navy Chief Information Officer, "Army Moves to Enterprise Email," CHIPS Magazine, 2011, https://www.doncio.navy.mil/CHIPS/ArticleDetails.aspx.

[9] Army CIO/G-6, "Army Launches Enterprise Email: DISA Will Implement," Army.mil, October 26, 2010, https://www.army.mil/article/47210/army_launches_enterprise_email_disa_will_implement

[10] Ann Armstrong, "DISA Sunsets Defense Enterprise Email and Embraces New Communication Technologies," Defense Information Systems Agency, April 4, 2022. https://www.disa.mil/en/NewsandEvents/2022/DISA-sunsets-DEE.

[11] Margeret McBride, "Army Completes Migration to DOD Enterprise Email," army.mil, September 3, 2013, https://www.army.mil/article/109607/Army_completes_migration_to_DOD_Enterprise_Email/.

services such as equipment, maintenance, licensing, network configurations, and administration.[12]

In 2019, the DoD further mandated an interoperable electronic messaging, including email, across all components.[13] The resulting "*.mil" domain is controlled by the Department, used by all services, and is vital to joint commands, which rely on cross-service messaging.[14] While DoW controls the *.mil domain across all of the branches, each branch continues to use separate cloud-based service provided largely, but not exclusively, by Microsoft.[15] Although no official accounting of savings achieved though the interbranch email system has been located, savings were anticipated through a reduced infrastructure/IT footprint, consolidated licensing, and lower sustainment costs.[16]

Additionally, this effort is being implemented through a GSA single-award, firm-fixed price blanket purchase agreement,17 which demonstrates that GSA is already familiar with the procurement and contracting logistics of multi-agency email integration and is thus well-suited to house the proposed DSA.

In sum, the federal government has experience with migrating email systems to a consolidated cloud-based system. Both positive and negative aspects of this experience can be drawn upon to help smoothly and securely migrate and then manage the consolidation of the size proposed here. This DoW effort also demonstrates that considerable cost savings can be achieved from email consolidation.

ADVANTAGES OF A CONSOLIDATED CIVILIAN EMAIL SYSTEM

Increased Efficiency Across the Federal Government

Federal civilian agencies have been required to modernize and adopt cloud services for many years, with the goal streamlining operations, eliminating

---

[12] Armstrong.
[13] DoD Instruction 8170.01.
[14] Ibid.
[15] Ibid
[16] Office of the Secretary of Defense, Director of Cost Assessment and Program Evaluation, Operating and Support (O&S) Cost Estimating Guide, 2025, https://www.cape.osd.mil/files/otherGuides/OS_Cost_Estimating_Guide_2025.pdf. Sustainment costs (civilian, military and contractor) include personnel (including training), equipment, supplies, software, and services associated with operating, modifying, maintaining, supplying, and otherwise supporting a system in the DoD inventory. Defense Acquisition University, 2025 Operating and Support (O&S) Cost Estimating Guide, (Fort Belvoir, VA: DAU, 2025). https://www.dau.edu/sites/default/files/2025-02/2025%20OS%20Cost%20Estimating%20Guide.pdf. These costs include those associated with the system-specific training of personnel necessary to support the system. Defense Acquisition University. Ibid.
[17] Defense Information Systems Agency, Defense Enterprise Office Solution (DEOS), DISA.mil, February 2019, https://www.disa.mil/-/media/Files/DISA/Fact-Sheets/Defense-Enterprise-Office-Solution-DEOS-Nov2018.

redundancy, and achieving cost savings.[18] In 2014, GSA's Technology Transformation Service founded Cloud.Gov to facilitate agency transitions to cloud operations.[19] Through Cloud.Gov, GSA already has experience with cloud-based infrastructure and the migration of email systems to the cloud that would facilitate migrating federal civilian, unclassified email to a single cloud-based platform at DSA.[20]

Most agencies have complied with the directive to adopt cloud-based services, by developing *agency specific*, cloud-based systems that include some functionality allowing for communications, including email and collaboration on some work product, with other agencies. However, under the current system, each agency continues to expend resources on, among other things, redundant personnel, space, equipment, software, storage, and licensing for email.

For these reasons, OMB has identified IT "commodity services" also referred to as enterprise services such as email, as standardized and duplicative functions appropriate for consolidation and shared-service delivery.[21]

Cost Savings from Infrastructure Consolidation

Migrating agency email infrastructure to a cloud-based service has already demonstrated the ability to reduce costs. In 2025, GAO found that by simply enhancing management of existing information technology systems the federal government could save over $100 million.[22] In 2025, GSA also announced an innovative agreement with Amazon Web Services to provide up to $*1 billion* in savings for cloud adoption and modernization and training for federal agencies, although it appears that these cloud services will be adopted pursuant to agency-specific agreements.[23]

With respect to email specifically, in 2011, GSA migrated 17,000 email accounts at a savings of $2 million and with an estimated savings of $15 million

---

[18]Office of Management and Budget, "Federal Cloud Computing Strategy: Cloud Smart". Washington, DC: Executive Office of the President, 2019. https://cloud.cio.gov/strategy

[19] TTS Handbook, "TTS mission, history, and values," Government Services Administration, January 26, 2026, https://handbook.tts.gsa.gov/about-us/tts-history/.

[20] Ibid.

[21] United States Chief Information Officer, "Federal Cloud Computing Strategy ("Cloud Smart")," cio.gov, 2019, https://cloud.cio.gov/strategy/; Office of Management and Budget, "M-19-16: Centralized Mission Support Capabilities for the Federal Government," April 26, 2019, https://www.whitehouse.gov/wp-content/uploads/2019/04/M-19-16.pdf.

[22] Edward Graham, "Consolidating IT Systems Can Lead to Over $100M in Cost Savings, GAO Finds," Nextgov, May 13, 2025, https://www.nextgov.com/modernization/2025/05/consolidating-it-systems-can-lead-over-100m-cost-savings-gao-finds/405307/.

[23] United States General Services Administration, "GSA Announces OneGov Agreement with Amazon Web Services; Provides up to $1 Billion in Savings to Accelerate IT Transformation and Catalyze American AI Leadership," news release, August 7, 2025. https://www.gsa.gov/about-us/newsroom/news-releases/gsa-announces-onegov-agreement-with-aws-08072025.

over five years.[24] Based on this experience, GSA estimated that agencies could save $1 million per 7,500 employees migrated to the cloud, representing a 50% reduction in costs.[25] Applying such savings to two million federal civilian workers, the savings would be $266 million. Additionally, as noted above, an Army Audit Agency review of the Army's migration of email under the DEE program confirmed savings of approximately $78 million per year, *exclusive of payrolls costs*.[26] While an exact apples-to-apples comparison of the foregoing estimates of cost savings for migration to DSA exceeds the scope of this document, it is clear that consolidation of email in a single cloud-based system will likely achieve significant cost savings.

Cost Savings from Personnel and Payroll Reductions

The second Trump administration's efforts to reduce the federal workforce though a combination of deferred resignations, firing of probationary employees, agency closures,[27] and reorganizations[28] eliminated more than 315,000 workers in 2025.[29] In this regard, the positions supporting unclassified email are ideally suited for consolidation.

For example, in 2024 the federal government employed an estimated 100,000 IT and cyber workers.[30] Even if *conservatively* estimating the decrease in federal IT personnel by only 5,000, offset by the hiring of new DSA employes, the savings would be significant.

That is, in 2025, the average salary of a GS-13 (Step 8) federal IT employee in the Washington-Baltimore area was $128,000[31] and with additional standard benefits of $40,000 included,[32] the annual total cost of the average federal IT

---

[24] RMOYERS, "Email as a Service: A Clear Vision into a Cloudy Future" Great Government Through Technology, October 3, 2012, https://gsablogs.gsa.gov/technology/2012/10/03/email-as-a-service-a-clear-vision-into-a-cloudy-future/.

[25] Ibid.

[26] Armstrong.

[27] Fatma Tanis and Leila Fadel, "USAID officially shuts down and merges remaining operations with State Department," NPR, July 1, 2025, https://www.npr.org/2025/07/01/nx-s1-5451372/usaid-officially-shuts-down-and-merges-remaining-operations-with-state-department.

[28] Associated Press, "EPA eliminates research and development office as it begins layoffs" NBCnews, July 18, 2025, https://www.nbcnews.com/politics/trump-administration/epa-eliminates-research-development-office-layoffs-begin-rcna219725.

[29]Drew Friedman, "How staffing cuts in 2025 transformed the federal workforce," Federal News Network, January 1, 2026, https://federalnewsnetwork.com/workforce/2026/01/how-staffing-cuts-in-2025-transformed-the-federal-workforce.

[30] Natalie Alms, "Goodbye degree requirements? Biden administration pushes skills-based hiring for tech talent," NextGov, April 29, 2024, https://www.nextgov.com/people/2024/04/goodbye-degree-requirements-biden-administration-pushes-skills-based-hiring-tech-talent/396185.

[31] U.S. Office of Personnel Management, "Locality Pay Area Definitions," accessed February 20, 2026, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2025/locality-pay-area-definitions.

[32] U.S. Bureau of Labor Statistics, "Employer Costs for Employee Compensation – March 2025," USDL-25-0958, https://www.bls.gov/news.release/archives/ecec_06132025.pdf (applying the reported

employee comes to $168,000. Accordingly, even if just 5,000 of those IT worker positions were reduced, the savings would be $840,000,000 *annually*, excluding training, office space, hardware, software and licensing, etc. Of course, this number would be even more if a higher number of positions were eliminated.

Costs of Migration of Enterprise Email Functions

Although accurate costs across federal agencies are notoriously difficult to come by, one recent study by the Office for Fiscal and Regulatory Analysis (OFRA),[33] provided a preliminary "low cost" scenario for the type of email migration proposed here. OFRA calculated infrastructure and licensing costs of $360 million in 2026, staffing costs for 130 FTE of $20 million in 2026, and one-time migration and implementation costs of $150 million in 2026 dollars spread evenly over 2026–2028, for a total low-cost estimate of roughly $430 million to make the migration.[34]

For its high-cost estimate using these same cost categories, OFRA determined total annualized costs of the email migration over the same period would be approximately $735 million. Accordingly, even using the high-cost estimate, and the estimated savings for email migration identified above, there are likely to be meaningful annual cost savings, which would be even more significant under the low-cost estimate.[35]

HOW DSA MIGHT BE STRUCTURED

Enterprise Email Consolidation at GSA within DSA can be Achieved by Executive Order

GSA's organic statute[36] provides the GSA Administrator with authority to organize the agency, including though the creation of new offices.[37] FPASA also

---

31.3% benefits including retirement, IRA, Health Insurance, Life Insurance, and employer payroll taxes to the GS-13, step 8 salary).

[33] OFRA uses open-source and other technologies to help policy professionals simplify and streamline legislative design and rulemaking, with quantitative analyses that highlight major budgetary risks and opportunities. See https://www.americafirstpolicy.com/initiative/office-for-fiscal-and-regulatory-analysis.

[34] Office for Fiscal and Regulatory Analysis, "OFRA Estimate E2026-001: Estimated Fiscal Impact of Consolidating Unclassified Federal Email into a Centralized DSA-Managed Cloud Service," Preliminary Estimate, January 27, 2026.

[35] Ibid.

[36] Federal Property and Administrative Services Act of 1949, codified at 40 U.S.C. §§ 301, et seq. ("FPASA") (2024). https://www.law.cornell.edu/uscode/text/40/321.

[37] See 40 U.S.C. § 302(a), "The Administrator may appoint such officers and employees as the Administrator considers necessary to carry out the functions and duties of the Administrator." This language is commonly understood to provide authority to create offices for these officials. See e.g., Kahn v. United States, 618 F.2d 784, 787–88 (Ct. Cl. 1979) (recognizing broad managerial authority under FPASA to structure operations to promote economy and efficiency). See also, Chrysler Corp. v. Brown, 441 U.S. 281 (1979) (describing 5 U.S.C. § 301, the federal housekeeping statute, which uses language comparable to 40 U.S.C. § 302(a), as authorizing agency heads to issue internal regulations

states that "[t]he Administrator . . . shall procure and supply . . . nonpersonal services for executive agencies to use in the proper discharge of their responsibilities."[38] GSA has designated IT services and cloud email as nonpersonal services and procures and supplies IT services, including email, for use by other agencies as "nonpersonal" IT services.[39] By way of example, GSA has established an internal Office of Technology Transformation Services ("TTS") that collaborates with federal agencies to develop, procure, and implement IT that enhances government efficiency, cybersecurity, and digital accessibility.[40] Thus, GSA has the authority to organize its internal operations to create new offices and has, in fact, created TTS which, among other things, handles interagency IT. As such, it appears GSA could establish DSA as an internal office to handle interagency enterprise email services.

The executive order envisioned here would also instruct OMB to issue a policy memorandum directing agencies to migrate their internal enterprise email services to DSA.[41] OMB is responsible for overseeing federal information resources management, promoting interoperability, and eliminating unnecessary duplication across agencies.[42] Furthermore, OMB has the authority to designate GSA as the executive agent for government-wide IT initiatives.[43] Under these authorities, the combination of GSA and OMB authority was able to establish the TTS within GSA for the management of specific interagency IT services, such as login.gov, cloud.gov,

---

governing the organization and management of their departments). See also 5 U.S.C. § 301, regarding Departmental Regulations.

[38] 40 U.S.C. § 501(a).

[39] 40 U.S.C. § 501; See also the definitions at 40 U.S.C. § 102(8); United States General Services Administration, "GSA Multiple Award Schedule — IT Category (formerly IT Schedule 70)," gsa.gov, accessed February 18, 2026), https://www.gsa.gov/technology/it-contract-vehicles-and-purchasing-programs/multiple-award-schedule-it; U.S. General Services Administration, Office of Inspector General, "Audit of Price Evaluations and Negotiations for Schedule 70 Contracts," Report No. A150022/Q/T/P16005, (General Services Administration, September 28, 2016), 2, Table 1, https://www.gsaig.gov/sites/default/files/audit-reports/A150022_1.pdf. (Explicitly describing the scope of offerings, including cloud/email services under the "Computer and Networking Hardware" category).

[40] U.S. General Services Administration, "Delegations of Authority Manual, Chapter 13: Technology Transformation Service (TTS)," ADM 5450.39D, CHGE 6 (Washington, DC: General Services Administration, August 16, 2016). https://www.gsa.gov/directives-library/delegations-of-authority-manual-chapter-13-technology-transformation-service-tts; The GovCon Guide to Federal Agencies: Technology Transformation Service (GSA) – A Guide for New Government Contractors, INGOVCON, accessed February 19, 2026, https://ingovcon.com/the-govcon-guide-to-federal-agencies/technology-transformation-service-gsa-a-guide-for-new-government-contractors/.

[41] OMB's authority to oversee federal information resources and direct agencies to reduce duplication is grounded in the Paperwork Reduction Act and related statutes. See Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501 et seq., § 3504. https://www.law.cornell.edu/uscode/text/44/3504. See also 44 U.S.C. § 3602 – Office of Electronic Government (within OMB) (as amended by the Federal Information Technology Acquisition Reform Act ("FITARA")). https://www.law.cornell.edu/uscode/text/44/3602.

[42] See 40 U.S.C. § 11302(e).

[43] Clinger-Cohen Act of 1996, 40 U.S.C. §§ 11301–11303, § 11302(e).

and FedRAMP, among other initiatives.[44] In short, GSA established TTS and operated the platforms, while OMB created the policy environment that made them government-wide solutions.

Moreover, early in his second term, President Trump issued an executive order that directs OMB to designate the GSA Administrator as the executive agent for all government-wide acquisition contracts for information technology, requires GSA to "rationalize" IT contracts government-wide, eliminate duplication and inefficiency, and requires agencies to shift procurement of "common goods and services (including IT)" to GSA, "where permitted by law."[45] Additionally, as a practical matter, OMB can tie agency compliance with email migration to OMB's budget approval authority, e.g., only approving agency funding requests for email services if the agency migrates email functions to GSA or denying an agency's request for funding for legacy email systems.

In sum, there does not appear to be an impediment to the issuance of an executive order directing GSA to establish DSA to handle the consolidation of cloud-based enterprise email operations with the interagency coordination and policy support of OMB.

Organization

For purposes of discussion, DSA could be organized by creating the following departments: Operations, Legal, and Security. Conceivably, DSA's departments, or components of them, could be located anywhere in the United States, taking advantage of places where costs are lower, and in conformity with efforts to decentralize the federal government. Diffusion of the departments would also limit the ability of weather, geological, or other localized events to create wide-spread disruptions to DSA's services.

Operations Division

The Operations Division would manage the logistics of consolidation and day-to-day management of the centralized email infrastructure and operations at DSA. At the outset, DSA personnel, such as programmers and database managers, would coordinate the data exchange from each agency to DSA. Implementation and migration should happen in stages, with emails for newly hired federal employees being added to the new system as they are onboarded. Using AI, the Operations Division would create unique and permanent email accounts for new federal employees and resolve duplicate names conflicts. At the same time, DSA would

---

[44] 40 U.S.C. § 11302.

[45] United States. Executive Order 14240, Eliminating Waste and Saving Taxpayer Dollars by Consolidating Procurement. 90 Fed.Reg. 13671 (March 20, 2025). https://www.federalregister.gov/executive-orders. It is important to note that GSA/OMB could not transfer core statutory mission functions of an agency nor tread on agency Chief Information Officer statutory authority, however, the migration envisioned here is intended to neither.

migrate email of existing employees to the cloud by agency in logical sequences. Agencies would designate personnel who are authorized to work with points of contact within DSA to address functional or other email inquiries.

Operations personnel would also "deactivate" legacy accounts when an employee leaves government employment or when an address is no longer necessary such as a mailbox dedicated to an agency program that has ended. Another advantage of centralized email operations is the ability of DSA to reactivate a former employee's permanent account upon the employee's return to government service. No longer will government employees have numerous accounts throughout their career. This would significantly improve the accuracy and timeliness of responses to legal requests.

Importantly, the Operations Division would also ensure that the storage of emails complies with National Archives and Records Administration (NARA) requirements for the retention of records, although each agency would remain responsible for review of the emails for purposes of identifying "federal records" that must be retained and provide direction to DSA regarding final disposition of their emails to NARA.

Security Division

The security division would constantly monitor all emails it manages for malware, hacks, data breaches, unauthorized access, and contraband *e.g.*, child exploitation material. The dissemination of offices outside of Washington, D.C., as referenced above, would allow for "firebreaks" between installations to help contain potential hacks or breaches of the otherwise consolidated system.

Potential criminal activity discovered by the security division would be referred to the appropriate federal law enforcement agency and a parallel notification made to the Office of the Inspector General for the agency where the employee sending or receiving the offending email works.

Impermissible activity that does not appear to be criminal in nature would also be referred to the agency where the offending email originated for action and parallel notification made to the responsible Office of the Inspector General.[46]

Legal Division

Legal requests for records, such as subpoenas, Freedom of Information Act requests, and search warrants would be forwarded by an agency to DSA's legal division and be assigned to a specific lawyer or team of lawyers who would become

[46] Security operations and standards may need to be coordinated with other agencies. For example, CISA's federal cybersecurity leadership coordinates federal information-system security and issues cybersecurity directives. See 6 U.S.C. § 659 (2024) (codifying § 2209 of the Homeland Security Act of 2002). Other agencies, including OMB, have a role in federal cybersecurity but these issues are beyond the scope of this paper.

counsel for the agency in accessing email records. As such, all communications between the agency and DSA's legal department would be protected, including by the attorney-client privilege, attorney work product doctrine, deliberative process privilege and executive function privilege.

As the central repository of emails, DSA would facilitate responses to legal requests by maintaining a fully searchable database. DSA would act as the custodian of the emails, not as the owner, and DSA would not develop or conduct searches for records in response to a legal inquiry. DSA would simply provide an agency responding to a legal inquiry with a secure portal for accessing the agency's email records at which point the agency could conduct its own search with DSA's involvement being limited to providing technical assistance, as necessary. The agency would remain responsible for the adequacy of the search.

LOCATION OF DSA

DSA components may be co-located or instead housed in standalone facilities. Primary considerations for identifying suitable locations include adequate office space, robust internet connectivity, and a reliable supply of energy.

The dispersal of DSA facilities would advance efforts to decentralize the federal government, move personnel away from Washington, D.C., and correspondingly move federal operations closer to the people they are meant to serve. Decentralization would also help to protect against weather, geological, or other localized disruptions if DSA locations were designed as failover locations capable of performing all functions if necessary.

A NOTE ABOUT MIGRATION OF ENTIRE SOFTWARE SUITES SUCH AS MICROSOFT 365

This proposal does not address the possibility of consolidating the full suite of functions that come with office software platforms, like Microsoft 365 and Google Workspace, currently used by many agencies. However, email is integrated with these platforms such that migrating it without the other software functions could reduce the potential savings identified above. Conversely, including consolidation of the enterprise aspects of the suite of office functions at DSA would likely further reduce those agency costs that involve economies of scale, such as licensing, personnel, hardware and hardware service contracts. GSA's ability to negotiate discounts could result in substantial additional savings across the executive branch. However, consideration of these issues is beyond the scope of this paper.

CONCLUSION

Based on the foregoing, the following steps are recommended:

1. Issue an executive order directing the General Services Administration to establish an internal office called the Data Services Administration to consolidate and manage all civilian, non-DoW, unclassified enterprise email systems on a centralized, cloud-based system.

2. The executive order would also instruct the Office of Management and Budget to direct federal civilian non-DoW agencies to migrate their non-classified, enterprise email functions to the Data Services Administration.

3. Eliminate redundant infrastructure and personnel at each agency resulting from the transfer of unclassified email management to the Data Services Administration.

4. Organize and locate the Data Services Administration in consideration of the recommendations above.

5. Establish permanent email accounts for all new employees at onboarding.

6. Begin migrating existing federal employees to the Data Services Administration's new platform.