

## Local Grievance # \_\_\_\_\_

### Issue Statement (Block 15 of PS Form 8190):

Did management violate Article 41.2.B of the National Agreement by failing to properly place Letter Carrier **[Name]** on the career City Letter Carrier craft seniority list at the **[Station/Post Office]**, and if so, what should the remedy be?

### Union Facts and Contentions (Block 17 of PS Form 8190):

#### Facts:

1. Letter Carriers **[names]** were converted to full-time status on **[date]** at the **[Station/Post Office]**. This is documented with PS Forms 50 in the case file.
2. Management did not use the correct relative standing of Letter Carriers **[names]** to determine seniority placement on the career City Letter Carrier craft seniority list.
3. Letter Carrier **[name]** had a relative standing date of **[date]** at the **[Station/Post Office]**. This is documented with the relative standing list dated **[date]**.
4. Letter Carrier **[name]** had a relative standing date of **[date]** at the **[Station/Post Office]**. This is documented with the relative standing list dated **[date]**.
5. Article 41.2.B.6 of the National Agreement states:

*In cases of appointment on the same day, where there is a tie in seniority, the relative standing on the appointment register will determine the more senior carrier.*

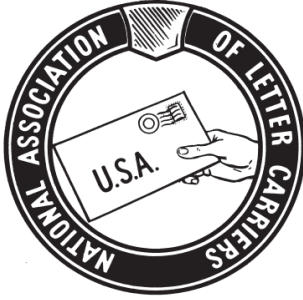
#### Contentions:

1. Management violated Article 41.2.B of the National Agreement when they placed Letter Carrier **[name]** below Letter Carrier **[name]** on the career City Letter Carrier craft seniority list based on something other than their correct relative standing.

2. Since Letter Carrier **[name]** had a relative standing date preceding that of Letter Carrier **[name]**, Letter Carrier **[name]** should be placed before Letter Carrier **[name]** on the Career City Letter Carrier craft seniority list.

**Remedy (Block 19 of PS Form 8190):**

1. That management cease and desist violating Article 41.2.B of the National Agreement in the future.
2. That Letter Carriers **[names]** immediately be placed in the proper order on the career City Letter Carrier craft seniority list at the **[Station/Post Office]**.
3. That Letter Carrier **[name]** be made whole for any benefit of seniority missed due to the placement error.
4. That Letter Carrier(s) **[Name], [Name], and [Name]** each be paid a lump sum of \$100.00 to serve as an incentive for future compliance.
5. That all payments associated with this case be paid as soon as administratively possible, but no later than 30 days from the date of settlement.
6. That proof of payment be provided to **[NALC Official]** upon payment, and/or any other remedy the Step B team or an arbitrator deems appropriate.



## National Association of Letter Carriers Request for Information

To: \_\_\_\_\_  
(Manager/Supervisor)

Date \_\_\_\_\_

\_\_\_\_\_  
(Station/Post Office)

Manager/Supervisor \_\_\_\_\_,

Pursuant to Articles 17 and 31 of the National Agreement, I am requesting the following information to investigate a grievance concerning a violation of Article 41 of the National Agreement :

1. A copy of the current career City Letter Carrier craft seniority list at the **[Station/Post Office]**.
2. A copy of Letter Carriers **[Names]** most recent PS Form 50.
3. A copy of the relative standing list at the **[Station/Post Office]** prior to the conversion of Letter Carriers **[Names]** to career status.

I'm also requesting time to interview the following individuals:

1. **[Name]**
2. **[Name]**
3. **[Name]**

Your cooperation in this matter will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

\_\_\_\_\_  
Request received by: \_\_\_\_\_

Shop Steward  
NALC

Date: \_\_\_\_\_



## National Association of Letter Carriers Request for Steward Time

To: \_\_\_\_\_  
(Manager/Supervisor)

Date \_\_\_\_\_

\_\_\_\_\_  
(Station/Post Office)

Manager/Supervisor \_\_\_\_\_,

Pursuant to Article 17 of the National Agreement, I am requesting the following steward time to investigate a grievance. I anticipate needing approximately \_\_\_\_\_ (hours/minutes) of steward time, which needs to be scheduled no later than \_\_\_\_\_ in order to ensure the timelines established in Article 15 are met. In the event more steward time is needed, I will inform you as soon as possible.

Your cooperation in this matter will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

\_\_\_\_\_  
Shop Steward  
NALC

Request received by: \_\_\_\_\_

Date: \_\_\_\_\_