

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

### Issue Statements - (Block #15 of PS Form 8190):

1. Did Management violate Section 141.1 of the M-39 Handbook via Article 19 of the National Agreement when they improperly planned/implemented route adjustments in the **[Station/Post Office]** and if so, what should the remedy be?
2. Did Management violate 242.122 of the M-39 Handbook via Article 19 of the National Agreement when they failed to adjust routes in the **[Station/Post Office]** to as near to 8 hours daily work as possible and if so, what should the remedy be?

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

#### Facts:

1. Minor route adjustments were made on a unit wide basis in the **[Station/Post Office]**. This is documented by the PS Forms 1840 Reverse included in the case file.
2. The minor route adjustments were implemented in the **[Station/Post Office]** on **[Date]**.
3. NALC Branch **[Number]** officials were not notified about the minor route adjustments until **[Date]**. This is documented by a statement from the branch president included in the case file.
4. Section 141.17 of the M-39 Handbook states in relevant part:

*“Prior to making any minor adjustments on a unit wide basis, management must notify the local union as far in advance as possible...”*
5. The adjustment consultations with the carriers(s) involved took place on **[Date]**. The adjustments were placed in effect on **[Date]**.
6. Section 141.17 of the M-39 Handbook states in relevant part:

*“... Any proposed adjustments must be placed in effect within 45 calendar days after the end of the adjustment consultation with the carriers involved...”*
7. The last mail count and inspection of the routes at the **[Station/Post Office]** was conducted on **[Date]** thru **[Date]** and the adjustments were implemented on **[Date]**.

8. Routes **[Route numbers]** are no longer served by the same letter carriers as during the time of the last mail count and inspection. This is documented with the PS Forms 1840 from the last mail count and inspection and the current route base information report.
9. Section 141.19 of the M-39 Handbook provides a simple formula for making minor adjustments without mail counts and inspection if the previous count and inspection data is reasonably current and the same carrier is serving the route being considered.

10. Section 242.122 of the M-39 Handbook states in relevant part:

*“The proper adjustment of carrier routes means an equitable and feasible division of the work among all of the carrier routes assigned to the office. All regular routes should consist of as nearly 8 hours daily work as possible.”*

11. Section 141.17 of the M-39 Handbook states in relevant part:

*“... Any proposed adjustments must be placed in effect within 45 calendar days after the end of the adjustment consultation with the carriers involved...”*

## **Contentions:**

1. Management violated Section 141.17 of the M-39 Handbook by failing to notify the local union as far in advance as possible about the planned unit wide minor route adjustments in the **[Station/Post Office]**. The union contends management was aware of their intent to conduct minor route adjustments in the **[Station/Post Office]** as early as **[Date]** when they **[Explain]**.
2. Management violated Section 141.17 of the M-39 Handbook when they failed to properly conduct adjustment consultations with the carriers at the **[Station/Post Office]**. This is documented by the carrier statement(s) in the case file. The union contends simply informing the carrier of the changes is not a proper consultation, but rather it must be an opportunity for the carrier to offer meaningful input in time to influence the final adjustment.
3. Management violated Section 141.17 of the M-39 Handbook by failing to place into effect the proposed adjustments within 45 calendar days after the end of the adjustment consultation(s) with the carrier(s) involved.
4. Management violated Section 141.19 of the M-39 Handbook by not using reasonably current mail count and inspection data for route(s) **[Route numbers]**.
5. Management violated Section 141.19 of the M-39 Handbook when they adjusted route(s) **[Route numbers]** using the minor adjustment process because different

letter carrier(s) are assigned to this/these route(s) as compared to the previous mail count and inspection.

6. Management violated Section 242.122 of the M-39 Handbook when routes **[Route numbers]** were not adjusted to consist of as nearly 8 hours daily work as possible following the minor adjustment. This is documented by the Workhour Workload Reports (By Route) included in the case file.
7. Management violated Section 141.19 of the M-39 Handbook when they did not use the simple formula for making minor adjustments without mail counts and inspection when the same carrier was serving the route and the previous count and inspection data was current when they adjusted route(s) **[Route numbers]**. The union contends this is validated by the lack of information provided by the management in response to #7 of the information request submitted.
8. Management violated Sections 141.113 and 141.116 of the M-39 Handbook when they failed to ensure the results of the applicable procedures outlined in these sections were fully implemented and enforced prior to implementing a minor route adjustment.

#### **Remedy (Block #19 on PS Form 8190):**

1. That management cease and desist future violations of Sections 141.1 and 242.1 of the M-39 Handbook.
2. That all the routes at the **[Station/Post Office]** be returned to the status they were in prior to the minor route adjustments or instruct the local parties to jointly adjust each route to as near 8 hours' work as possible.
3. That each Letter Carrier assigned to the **[Station/Post Office]** be paid \$25.00 per calendar day beginning **[Date]** and continuing each calendar day until such time as # 2 above is accomplished.
4. That all payments associated with this case be made as soon as administratively possible, but no later than 30 days from the date of settlement.
5. 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.

# Interview

Name (Please Print) \_\_\_\_\_

1. What is your route number? \_\_\_\_\_

2. Did you have an adjustment consultation? If so, when?

\_\_\_\_\_

3. How long did the consultation last? \_\_\_\_\_

4. Were you told what adjustments were going to be made during the consultation? If so, what were they? \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

5. Were you the regular carrier on the route during the last count and inspection? \_\_\_\_\_

Signature: \_\_\_\_\_

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



## National Association of Letter Carriers Request for Information

To: \_\_\_\_\_  
Supervisor Customer Services

Date \_\_\_\_\_

\_\_\_\_\_  
Station/Post Office

Dear \_\_\_\_\_,

In accordance with Articles 17 and 31 of the National Agreement, I am requesting any and all information regarding the justification for planning/implementing minor route adjustments in the **[Station/Post Office]**.

This request includes, but is not limited to:

1. A copy of PS Forms 1840 Reverse for each route from the minor route adjustment for the **[Station/Post Office]**.
2. Copies of PS Forms 1840 (front) from the last mail count and inspection for all routes in the **[Station/Post Office]**.
3. Workhour/Workload Reports by Route for all routes at the **[Station/Post Office]** Installation from the implementation date, **[Date]** to the present date **[Date]**.
4. Copy of the Route Base Information Report for the **[Station/Post Office]**.
5. Any and all documentation verifying the implementation and enforcement of all pre-minor adjustment observations and procedures required in Section 141.1 of the M-39 Handbook.
6. Copies of the PS Form(s) 3998, Unit Summary of City Delivery Assignments used in relation to the recently conducted unit wide minor adjustment at the **[Station/Post Office]**.
7. Copies of all documents showing the application/results of the simple formulas described in Section 141.19 of the M-39 Handbook for the following route(s)

**[Route numbers]**.

8. Any and all documentation of adjustment consultations conducted with letter carriers.

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

1. All Letter Carriers at the **[Station/Post Office]**.

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 Received date: \_\_\_\_\_



## National Association of Letter Carriers Request for Steward Time

To: \_\_\_\_\_  
Supervisor Customer Services

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

\_\_\_\_\_  
Station/Post Office

Dear \_\_\_\_\_,

Pursuant to Article 17 of the National Agreement, I am requesting the following steward time to investigate a grievance regarding a violation of the provisions of the M-39 Handbook via Article 19 of the National Agreement.

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, \_\_\_\_\_ Request received by: \_\_\_\_\_  
Shop Steward  
NALC  
Received date: \_\_\_\_\_