



National Association of Letter Carriers

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April 24, 2019

Certified Mail: 7000 1530 0002 6270 7923

Doug A. Tulino, Vice President
Labor Relations
United States Postal Service
475 L'Enfant Plaza, SW
Washington, DC 20260-4100

Dear Doug:

Pursuant to Article 15, Section 3.F of the National Agreement, I hereby initiate at the national level the following interpretive dispute arising from management's unilateral implementation of the consolidated casing initiative. According to letters from Alan Moore, dated January 9, March 21, and April 8, 2019, the Postal Service is planning to study the impact of consolidated casing assignments on city delivery routes. As stated in the March 21 letter the initial test site will be the Annandale, Virginia Post Office.

The proposed study appears to involve similar contractual issues that NALC has raised in Case Number Q06N-4Q-C-11377406, which remains pending at the national level. The consolidated casing initiative will necessarily result in numerous violations. Examples include the following:

1. Article 5 of the National Agreement prohibits the Employer from taking unilateral action affecting wages, hours, and other terms and conditions of employment. The proposed test fundamentally redefines the terms and conditions of letter carrier duty assignments, notwithstanding the lack of any agreement with the NALC.
2. The test will result in route adjustments which do not comply with the M-39 Handbook, as interpreted by Arbitrator Mittenthal in Case No. H7N- LT-C 39547 (Hempstead, NY, 1992).
3. The proposed test is inconsistent with, and not authorized by, Article 34 of the National Agreement.

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As you know, NALC and the Postal Service are parties to the Memorandum of Understanding Re: City Delivery Task Force. This memorandum provides a process for the parties to:

“Jointly explore the modification of current case configurations and work methods to identify more efficient techniques for handling residual and sequenced mail volumes.”

Outside of formal contract negotiations, the joint process authorized by this memorandum is currently the only mechanism to design and implement a test of the consolidated casing concept.

A meeting to discuss this interpretive dispute should be scheduled. Please have your representatives contact NALC Executive Vice President Brian Renfroe to make the necessary arrangements.

Finally, we are enclosing a request for information regarding the proposed study. Please respond to this request as expeditiously as possible.

Sincerely,



Fredric V. Rolando
President

NALC'S FIRST REQUEST FOR INFORMATION REGARDING CONSOLIDATED CASING STUDY

1. During our meeting held April 2, 2019, USPS indicated that the purpose of the test was to reduce the amount of total fixed office time and to reclaim office space for parcel sortation. Please confirm the purpose of the test.
2. During the meeting held April 2, 2019, USPS indicated that no current or new casing standards would be tested during proposed consolidated casing assignments test. Please confirm.
3. Will any new work measurement systems or work or time standards be tested during the consolidated casing assignments test?
4. During the meeting held April 2, 2019, USPS provided no end date for the test. When will the consolidated casing assignments test conclude?
5. If the test is deemed satisfactory, when will the determination be made to convert the test to live implementation in the test sites?
6. During the meeting held April 2, 2019, USPS indicated that all of the casing duties for six routes would be consolidated into one Office Caser/Carrier assignment. Please confirm.
7. During the meeting held April 2, 2019, USPS stated that the proposed Office Caser/Carrier position would be a full-time assignment. Please confirm.
8. In written correspondence dated April 15, 2019, USPS indicated that the test is tentatively scheduled to begin in the Annandale Post Office on May 18, 2019. Please confirm.
9. During the meeting held April 2, 2019, USPS indicated that the test would be conducted in three phases with Phase 1 being conducted in the Annandale Post Office. In Phase 2, the test would expand the test sites to one in each of the remaining USPS Areas. In Phase 3, the test would expand to approximately 200 sites with at least one in each USPS District. Please confirm and provide specific locations included in each phase and schedules for the start of Phases 2 and 3.

10. During the meeting held April 2, 2019, USPS stated that it anticipated a reduction of 3.15 full-time assignments in the Annandale Post Office. Please confirm the anticipated reduction.
11. What are the anticipated procedures for posting, bidding, and awarding of the newly created Office Caser/Carrier and Street Carrier assignments?
12. How will a carrier technician assignment be defined for purposes of the test?
13. The provided Stand-up talk, dated April 2019, listed specific office duties of Office Caser/Carrier assignments. What street duties will be assigned to Office Caser/Carrier assignments to make them full-time positions?
14. The provided Stand-up talk, dated April 2019, listed the specific AM office responsibilities and street duties of Street Carrier assignments. What are the PM office duties for Street Carrier assignments?
15. During our meeting held April 2, 2019, USPS advised that route assignments in the Annandale Post Office are currently in proper adjustment. Please confirm.
16. During our meeting held April 2, 2019, and in the provided Stand-up talk dated April 2019, USPS advised that the Street Carrier assignments in the Annandale Post Office would be adjusted to 7:45 on the street with 15 minutes of office time. Will routes be evaluated and adjusted in accordance with Chapter 2 of Handbook M-39, *Management of Delivery Services*, Chapter 9 of Handbook M-41, *City Delivery Carriers Duties and Responsibilities*, and the Step 4 settlement in USPS case number Q01N-4Q-C05022605?
17. Will Office Caser/Carrier and Street Carrier assignments each be credited with six minutes of Fixed Office Time (FOT) for performing Line 14 tasks?
18. How much FOT will Office Caser/Carrier and Street Carrier assignments receive while performing Line 15 tasks?
19. When will Office Caser/Carrier and Street Carrier assignments perform Line 19 tasks? Will vehicle inspections be conducted pursuant to USPS Notice 76?

20. Will safety talks be performed in accordance with section 1-7 of Handbook EL-801, *Supervisors Safety Handbook*, and the Settlement Agreement dated August 26, 1980 (M-00605)?
21. Will both Office Caser/Carrier and Street Carrier assignments be credited with five minutes of FOT for Line 20?
22. How much FOT will Office Caser/Carrier assignments receive while performing Line 21 tasks?
23. Will Street Carrier assignments receive FOT for performing Line 21 tasks prior to leaving for the street?
24. How much FOT will Street Carrier assignments receive for performing Lines 14 and 21 office tasks upon the carriers' return to the office? Will the same amount of FOT be credited for both Office Caser/Carrier and Street Carrier assignments?
25. Will breaks be handled in accordance with section 242.341 of Handbook M-39?
26. Will schedules be established in accordance with section 122 of Handbook M-39?
27. Will accountable items be handled in accordance with sections 26 and 43 of Handbook M-41 during the test?
28. Who will complete PS Form 1564-A, *Delivery Instructions*, in accordance with section 244 of Handbook M-41 for Office Caser/Carrier and Street Carrier assignments prior to the test?
29. Who will complete PS Form 1564-B, *Special Orders*, in accordance with section 251 of Handbook M-41, for Office Caser/Carrier and Street Carrier assignments prior to the test?
30. Who will maintain PS Forms 1564-A and 1564-B for each assignment during the test?

31. Who will complete the Edit Book and PS Form 1621, *Delivery Management Report*, in accordance with section 253 of Handbook M-41, for each assignment prior to the implementation of the test?
32. The Stand-up talk, dated April 2019, indicates that the Office Caser/Carrier assignment will be responsible for maintaining the Edit Book for each route. Please confirm.
33. Who will maintain the PS Forms 1621 for each Street Carrier assignment during the course of the test?
34. Who will maintain the Carrier's Route Book, Instructions and Report in accordance with section 25 of Handbook M-41?
35. Who will complete PS Form 3982, *Changes of Address*, in accordance with section 241 of Handbook M-41 for each assignment prior to the implementation of the test?
36. Who will complete PS Form 3575, *Change of Address Order*, and PS Form 3546, *Forwarding Order Change Notice* in accordance with section 241 of Handbook M-41 for Office Caser/Carrier and Street Carrier assignments?
37. The Stand-up talk, dated April 2019, indicates that Office Caser/Carrier would place COA labels on PS Form 3982. Please confirm.
38. Who will complete PS Form 3575-Z, *Employee Generated Change of Address*, in accordance with sections 241 and 242.61 of Handbook M-41 for each assignment during the test?
39. Will parcels be handled in accordance with section 225.2 of Handbook M-41 and the Step 4 settlement in USPS case number H1N-3W-C20236?
40. The Stand-up talk, dated April 2019, indicates that Office Caser/Carrier assignments will handle Hot Case mail. How will preferential mail be handled in accordance with section 291 of Handbook M-41 for Street Carrier assignments?

41. How will the satchel for Office Caser/Carrier and Street Carrier assignments be stored when not in use in accordance with section 143 of Handbook M-39?
42. How will the first relay on Street Carrier assignments be handled in accordance with sections 121.314 and 121.32 of Handbook M-39?
43. How will schedules be established for Office Caser/Carrier and Street Carrier assignments during the test in accordance with Article 30.B.2 of the National Agreement and the Local Memorandum of Understanding (LMOU)?
44. How will sequenced mailings for Street Carrier assignments be handled in accordance with section 222 of Handbook M-39?
45. The Stand-up talk, dated April 2019, indicates that Office Caser/Carrier assignments will sequence mail for park and loop deliveries. Please clarify.
46. Will FSS mail be handled in accordance with the Memorandum of Understanding RE: *Approved FSS Work Methods*?
47. How will the reporting requirements for Street Carrier assignments be handled in accordance with section 131.4 of Handbook M-41 and section 122.33 of Handbook M-39?
48. Will undeliverable mail be handled in accordance with sections 24 and 44 of Handbook M-41?
49. The Stand-up talk, dated April 2019, indicates that Office Caser/Carrier assignments will process undeliverable mail with input from Street Carriers. How will Street Carriers provide this input? Will the input be given on office time or street time? If given on office time, will this be in the AM or PM? To what line item will this work be assigned?
50. Will all LMOU provisions be maintained during the test?
51. How will letter carriers servicing Street Carrier assignments be notified of customers whose mail is being held for a vacation hold?

52. How will closed business mail be handled?
53. How will letter carriers servicing Street Carrier assignments be notified of customers with Premium Forwarding Service Residential/Commercial?
54. How will S-999 mail be handled?
55. During our meeting held April 2, 2019, USPS advised that a separate piece of equipment would be provided for mail being held. Please confirm.
56. How will sortation errors for Delivery Point Sequence (DPS) mail be handled in accordance with the Step 4 settlement in USPS case number E94N-4E-C97078744?
57. How will letter mail not in DPS order be handled in accordance with *NALC/USPS Joint Questions and Answers Concerning the September 1992 Memorandums*?
58. How will temporary vacancies opted on under the provisions of Articles 41.2.B.3, 41.2.B.4, and 41.2.B.5 of the National Agreement prior to the beginning of the test be handled?
59. How will the opting be handled in accordance with the provisions of Articles 41.2.B.3, 41.2.B.4, and 41.2.B.5 of the National Agreement during the test?
60. During our meeting held April 2, 2019, and based on the Stand-up talk, dated April 2019, USPS indicated that all small separations on the carrier cases, as defined by section 221.11 of the M-41, will be reduced to one inch and that each separation will contain two deliveries. Please confirm.
61. The Stand-up talk, dated April 2019, indicates that Office Caser/Carrier assignments will load cased mail into the conveyance used for parcel distribution. Will hampers be loaded in accordance with sections 4-3.1.5 and 4-3.2.7 of Handbook PO-502, *Mail Transport Equipment*?