From: Lynn Pallas-Barber <lpallas@apwu.org>
Sent: Wednesday, August 12, 2020 8:01 AM
To: Bernard Timmerman <btimmerman@apwu.org>; Brian Dunn <bdunn@apwu.org>; Charles Tillman <ctillman@apwu.org>; John Jackson <jjackson@apwu.org>; Martin Mater <mmater@apwu.org>
Cc: Lamont Brooks <lbrooks@apwu.org>; Sam Lisenbe <slisenbe@apwu.org>; Clerk Division NBA <ClerkDivisionNBA@apwu.org>; Ronald Suslak <rsuslak@apwu.org>
Subject: FW: NDRC - Processing Article 7.2 Grievances at Step 3 - tripartite email chain.
Importance: High

Brothers,
It has been brought to my attention that the attached email concerning the processing of the Article 7.2 grievances at Step 3 filed since the up-dated MOU appeared to come from the APWU and was not tripartite. See the email chain below which clearly provides that what was sent yesterday was agreed on by all three parties.

Any further concerns contact Ron or I.

Lynn Pallas-Barber
Assistant Clerk Craft Director
1300 L Street, NW
Washington, DC 20005
202-842-4220

From: Richardson, Shannon R - Washington, DC <Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>
Sent: Tuesday, August 11, 2020 10:44 AM
To: Lynn Pallas-Barber <lpallas@apwu.org<mailto:lpallas@apwu.org>>; Kevin Fletcher <kfletcher@npmhu.org<mailto:kfletcher@npmhu.org>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: RE: NDRC - Processing Article 7.2 Grievances at Step 3

All,

How about sending it out at 1:00 today?

Thanks,

Shannon Richardson
Labor Relations Specialist
Headquarters APWU Contract Administration
Office: 202-268-5842
Mobile: 202-607-5628

From: Lynn Pallas-Barber [mailto:lpallas@apwu.org]
Sent: Thursday, August 6, 2020 10:08 AM

To: Kevin Fletcher <kfletcher@npmhu.org<mailto:kfletcher@npmhu.org>>; Richardson, Shannon R - Washington, DC <Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: [EXTERNAL] RE: NDRC - Processing Article 7.2 Grievances at Step 3

CAUTION: This email originated from outside USPS. STOP and CONSIDER before responding, clicking on links, or opening attachments.
We will do the same once the agreed upon time is determined.

Lynn Pallas-Barber
Assistant Clerk Craft Director
1300 L Street, NW
Washington, DC 20005
202-842-4220

From: Kevin Fletcher <kfletcher@npmhu.org<mailto:kfletcher@npmhu.org>>
Sent: Thursday, August 6, 2020 10:02 AM
To: Richardson, Shannon R - Washington, DC <Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>; Lynn Pallas-Barber <lpallas@apwu.org<mailto:lpallas@apwu.org>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: RE: NDRC - Processing Article 7.2 Grievances at Step 3

Shannon,

Thank you. When does the USPS plan to send this to their reps? We will send to our Step 3 and RDRC reps at the same time.

Kevin Fletcher
Contract Administration Department
National Postal Mail Handlers Union
815 16th Street NW, Ste. 5100
Washington DC 20006
(Direct) 202.649.4446
(O) 202.833.9095
(C) 202.368.7134
(F) 202.296.6339

From: Richardson, Shannon R - Washington, DC
<Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>
Sent: Thursday, August 6, 2020 9:48 AM
To: Kevin Fletcher <kfletcher@npmhu.org<mailto:kfletcher@npmhu.org>>; Lynn Pallas-Barber <lpallas@apwu.org<mailto:lpallas@apwu.org>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: RE: NDRC - Processing Article 7.2 Grievances at Step 3

All,

Revised with Kevin's feedback.

In February 2019, you were advised that the NDRC had agreed that any Article 7.2 cross-craft grievance that was filed after September 1, 2017, and was appealed to Step 3, would be held in abeyance at Step 3 until the September 1, 2017 updated inventory for the facility was completed. It was anticipated that the completion of those inventories would resolve most of the disputes. Once the inventory for the facility in question was completed, if any dispute remains, you were instructed to follow the June 26, 2018 Update RI-399 MOU procedures.

The NDRC has now agreed that for those facilities where there is a partially completed updated inventory, the Article 7.2 cross-craft grievances that were held in abeyance at Step 3 and those grievances which are pending at or will be appealed to Step 3 will be processed in accordance with the June 26, 2018 Update RI-399 MOU procedures. For those facilities with partially completed inventories (i.e., some functions are agreed to, some functions are in dispute), if the work function at issue within the grievance is in dispute, the grievance should be held in abeyance at Step 3; if the work function at issue has been agreed to by the parties (no dispute on that function in the partially completed updated inventory), then the grievance must be processed in the grieving union's Article 15 process and in accordance with the June 26, 2018 Update RI-399 MOU procedures.

Please ensure that all Step 3 LRS that may get these appeals are aware of this expectation. Let me know if you have any questions.

Thanks,

Shannon Richardson
Labor Relations Specialist
Headquarters APWU Contract Administration
Office: 202-268-5842
Mobile: 202-607-5628

From: Kevin Fletcher [mailto:kfletcher@npmhu.org]
Sent: Wednesday, August 5, 2020 8:15 AM

To: Richardson, Shannon R - Washington, DC
<Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>; Lynn Pallas-Barber <lpallas@apwu.org<mailto:lpallas@apwu.org>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: [EXTERNAL] Re: NDRC - Processing Article 7.2 Grievances at Step 3

CAUTION: This email originated from outside USPS. STOP and CONSIDER before responding, clicking on links, or opening attachments.
Shannon,

We are fine with this, but I think we should change the word “is”to “was” completed at the end of the first sentence. I didn’t notice that when I wrote the first draft.

Thanks

Kevin Fletcher
CAD NPMHU

_____
From: Richardson, Shannon R - Washington, DC
<Shannon.R.Richardson@usps.gov<mailto:Shannon.R.Richardson@usps.gov>>
Sent: Tuesday, August 4, 2020 5:22:43 PM
To: Lynn Pallas-Barber <lpallas@apwu.org<mailto:lpallas@apwu.org>>; Kevin Fletcher <kfletcher@npmhu.org<mailto:kfletcher@npmhu.org>>; Dean, Rickey R - Washington, DC <rickey.r.dean@usps.gov<mailto:rickey.r.dean@usps.gov>>; Devine, Patrick M - Washington, DC <patrick.m.devine@usps.gov<mailto:patrick.m.devine@usps.gov>>; Ronald Suslak <rsuslak@apwu.org<mailto:rsuslak@apwu.org>>; Mindy Holmes <mholmes@murphypllc.com<mailto:mholmes@murphypllc.com>>; Teresa Harmon <THarmon@npmhu.org<mailto:THarmon@npmhu.org>>; Bruce Lerner (blerner@bredhoff.com<mailto:blerner@bredhoff.com>) <blerner@bredhoff.com<mailto:blerner@bredhoff.com>>
Subject: RE: NDRC - Processing Article 7.2 Grievances at Step 3

All,

I incorporated the feedback and came up with the below draft message. Please review and provide any additional feedback.

In February 2019, you were advised that the NDRC had agreed that any Article 7.2 cross-craft grievance that was filed after September 1, 2017, and was appealed to Step 3, would be held in abeyance at Step 3 until the September 1, 2017 updated inventory for the facility in that dispute is completed. It was anticipated that the completion of those inventories would resolve most of the

disputes. Once the inventory for the facility in question was completed, if any dispute remains, you were instructed to follow the June 26, 2018 Update RI-399 MOU procedures.

The NDRC has now agreed that for those facilities where there is a partially completed updated inventory, the Article 7.2 cross-craft grievances that were held in abeyance at Step 3 and those grievances which are pending at or will be appealed to Step 3 will be processed in accordance with the June 26, 2018 Update RI-399 MOU procedures. For those facilities with partially completed inventories (i.e., some functions are agreed to, some functions are in dispute), if the work function at issue within the grievance is in dispute, the grievance should be held in abeyance at Step 3; if the work function at issue has been agreed to by the parties (no dispute on that function in the partially completed updated inventory), then the grievance must be processed in the grieving union's Article 15 process and in accordance with the June 26, 2018 Update RI-399 MOU procedures.

Please ensure that all Step 3 LRS that may get these appeals are aware of this expectation. Let me know if you have any questions.

Thanks,

Shannon Richardson

Labor Relations Specialist

Headquarters APWU Contract Administration

Office: 202-268-5842

Mobile: 202-607-5628

Brothers:
Please find below the tripartite agreement from the NDRC to begin moving forward at Step 3 on the Article 7.2 grievances being held since the signing of the Up-dated MOU RI-399. The issues in the Article 7.2 grievances should be dealt with based on the agreed upon operations/functions in the updated inventories. If the issue is still in dispute it will continue to be held. The NDRC agreed to release this agreement at 1:00pm EST today. Please share with your LDRC representatives. All three parties should be sharing with their respective RDRC members.

In February 2019, you were advised that the NDRC had agreed that any Article 7.2 cross-craft grievance that was filed after September 1, 2017, and was appealed to Step 3, would be held in abeyance at Step 3 until the September 1, 2017 updated inventory for the facility was completed. It was anticipated that the completion of those inventories would resolve most of the disputes. Once the inventory for the facility in question was completed, if any dispute remains, you were instructed to follow the June 26, 2018 Update RI-399 MOU procedures.

The NDRC has now agreed that for those facilities where there is a partially completed updated inventory, the Article 7.2 cross-craft grievances that were held in abeyance at Step 3 and those grievances which are pending at or will be appealed to Step 3 will be processed in accordance with the June 26, 2018 Update RI-399 MOU procedures. For those facilities with partially completed inventories (i.e., some functions are agreed to, some functions are in dispute), if the work function at issue within the grievance is in dispute, the grievance should be held in abeyance at Step 3; if the work function at issue has been agreed to by the parties (no dispute on that function in the partially completed updated inventory), then the grievance must be processed in the grieving union's Article 15 process and in accordance with the June 26, 2018 Update RI-399 MOU procedures.

Please ensure that all Step 3 LRS that may get these appeals are aware of this expectation. Let me know if you have any questions.

Any questions or concerns feel, free to contact Ron and I.

Lynn Pallas-Barber
Assistant Clerk Craft Director
1300 L Street, NW
Washington, DC 20005
202-842-4220