

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

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

Did management at the **[Station/Post Office]** violate Section 215.1 of the M-39 Handbook and Section 913 of the M-41 Handbook via Article 19 of the National Agreement by failing to post a notice 5 working days before the start of the count period showing the schedule of the route count and inspection week and the proposed date(s) that city route(s) were scheduled to be inspected at the **[Station/Post Office]**, and if so, what should the remedy be?

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

#### Facts:

1. Management conducted a route count and inspection on Route(s) **[route #(s)]** at the **[Station/Post Office]** beginning on **[date]**.
2. Section 215.1 of the M-39 and Section 913 of the M-41 Handbooks both require management to provide the appropriate advance notice to Letter Carriers at least 5 working days before a route count and inspection begins.

#### Section 215.1 of the M-39 Handbook states:

215 **Posting Notice of Scheduled Mail Count and Inspection**

- 215.1 A notice must be posted at the delivery unit in advance of the scheduled mail counts and route inspections, showing the beginning date of the count for each route and the day and date each route is scheduled for inspection. This notice must be posted at least 5 working days before the start of the count period. If a decision is made to inspect on days other than the scheduled date, 1 day's advance notice must be given.

**(Emphasis Added)**

**Section 913 of the M-41 Handbook states:**

913 **Advance Notice**

A notice giving schedule of a count week and proposed day of inspection for each route shall be posted at the delivery unit not later than 5 working days preceding start of count. One day's advance notice will be given if a decision is made to inspect on days other than the scheduled date.

**(Emphasis Added)**

3. The case file includes statements/interviews from multiple Letter Carriers verifying that a notice showing the schedule of the count week and day(s) of inspection was not posted 5 working days preceding the count period.

**Contentions:**

1. Management violated Section 215.1 of the M-39 Handbook and Section 913 of the M-41 Handbook via Article 19 of the National Agreement by failing to post a notice showing the schedule of a count week and proposed day of inspection was not posted 5 working days preceding the count period.

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

1. That management cease and desist violating Section 215.1 of the M-39 Handbook and Section 913 of the M-41 Handbook via Article 19 of the National Agreement in the future.
2. That each Letter Carrier at the **[Station/Post Office]** is paid a lump sum of \$100.00 to serve as an incentive for future compliance, and/or any other remedy the Step B team or an arbitrator deems appropriate.



# National Association of Letter Carriers

## Request for Information

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

Date \_\_\_\_\_

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

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

Pursuant to Article 17 and 31 of the National Agreement, I am requesting the following information:

1. Copies of any and all correspondence from management to the local NALC branch regarding the route count and inspection which began on **[date]**.
2. Copies of any and all correspondence, emails and notifications between local management and the route inspection team/route inspectors.

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

1. All letter carriers whose regular assignments were scheduled for inspection

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: \_\_\_\_\_



# 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     Write & Prepare a Grievance     Interview Witnesses

I anticipate needing approximately \_\_\_\_\_ (hours) of steward time, which needs to be scheduled no later than \_\_\_\_\_. In the event more steward time is needed, I will inform you as soon as possible.

Individuals the union needs to interview:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

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: \_\_\_\_\_