Locai Grievance #	Grievance #
-------------------	-------------

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

Did management violate Section 211.2 of the M-39 Handbook via Article 19 of the National Agreement by failing to notify the local union of the period selected for the route count and inspection as far in advance as practicable, and if so, what should the remedy be?

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

#### Facts:

- 1. Management scheduled a route count and inspection on Route(s) **[route #(s)]** at the **[Station/Post Office]** to begin on **[date]**.
- 2. Section 211.2 of the M-39 Handbook states:
  - 211.2 The period selected for the mail count and route inspections should be determined as far in advance as possible, and the local union should be notified of this schedule. If it is necessary to change the period, the local union should be notified of the revised schedule as far in advance as practicable.
- 3. The case file includes a statement from the local union representative, [name], showing that notification was received on [date].

#### **Contentions:**

- 1. Management violated Section 211.2 of the M-39 Handbook via Article 19 of the National Agreement when they failed to notify the local union of the period selected as far in advance as practicable for the route count and inspection that began on [date].
- The union became aware of the intended route count and inspection period on [date].
- 3. Management was aware of the route count and inspection as early as [date] and did not provide advance notice to the union as far in advance as practicable.

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

- That management cease and desist from future violations of Section 211.2 of the M-39 Handbook via Article 19 of the National Agreement in the [Station/Post Office].
- 2. That each Letter Carrier in the **[Station/Post Office]** is paid a lump sum of \$100.00 to serve as 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**

Го:	Date
Supervisor Customer Services	
Station/Post Office	
Dear,	,
Pursuant to Article 17 and an anformation:	31 of the National Agreement, I am requesting the following
1. Copies of any and all corre	spondence from management to the local NALC branch
regarding the route count as	nd inspection which began on [date].
2. Copies of any and all corre	spondence, emails and notifications between local
management and the route	inspection team/route inspectors.
3. A copy of the Letter Carrie	r work schedule for the week(s) of [date].
4. A copy of the route count a	and inspection schedule for [date] through [date] at the
[Station/Post Office].	
'm also requesting time to intervie	ew the following individuals:
1. All letter carriers whose reg	gular assignments were scheduled for inspection
*	atter will be greatly appreciated. If you have any questions y be of assistance to you in some other way, please feel free to
Sincerely,	
	Request received by:
Shop Steward	Doto



## **National Association of Letter Carriers**

# **Request for Steward Time**

To:	Date:
Supervisor Customer Serv	
Station/Post Office	
Dear	
	of the National Agreement, I am requesting the following steward
time to:	
Investigate a Grievance	Write & Prepare a Grievance  Interview Witnesses
I anticipate needing approxima	ately (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	s soon as possible.
Individuals the union needs to	
•	is matter will be greatly appreciated. If you have any questions may be of assistance to you in some other way, please feel free to
Sincerely,	
	_ Request received by:
Shop Steward	• • •
NAI C	Date: