

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

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

1. Did management violate Section 217 of the M-39 Handbook and Section 917 of the M-41 Handbook via Article 19 of the National Agreement by failing to properly conduct a “Dry-Run Count” with all Letter Carriers within the 21 day period prior to the start of the route count and inspection that began on [date] 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 scheduled/conducted a route count and inspection on all city routes at the [Station/Post Office] that began on [date].
2. Section 217 of the M-39 Handbook states:

#### <sup>217</sup> Dry-Run Count

- 217.1 A review of the count procedures will be made within 21 days prior to the start of the count and route inspection to teach the carrier how to accurately complete count forms (1838-C and 1838-A) during the period of count and inspection. An actual count of mail or recording of time used will not be kept on the day the dry run is made.
- 217.2 The sample dry-run count items, forms, and completion instruction must be furnished each carrier concerned in time to allow for completion and review prior to start of the period of count and inspection (see exhibits 217.2 (p. 1, 2, and 3)). Overtime or auxiliary assistance should not be used for the completion of the dry run. Therefore, a lighter volume day should be selected. Use only the appropriate data (EPM/Non-EPM) for the unit being inspected.
- 217.3 An instruction period should be held following the issuance of the dry-run materials but before the completion of the dry-run exercise.
- 217.4 The carrier must be furnished a sample list of mail-count items and time-used items. The carrier must enter these items on a *dry-run* form. A manager must review each completed dry-run form for accuracy, error, and omissions, and they must be discussed and explained to the carrier. When necessary, the manager may require a second completion of the form to assure that the carrier is thoroughly familiar with completing the form to be used.

3. Section 917 of the M-41 Handbook states:

917 **Dry-Run Count**

- 917.1 A review of count procedures shall be made within 21 days prior to the start of the count and route inspection.
- 917.2 The sample dry-run count items, forms, and completion instructions are furnished to each carrier concerned early enough to assure that the dry-run can be completed and reviewed before scheduled count and inspection period.
- 917.3 An instruction period is held following issuance of the dry-run materials but before completion of the dry-run exercise.
- 917.4 A manager will review each completed dry-run form for accuracy. Errors and/or omissions are discussed and explained to the carrier. When necessary, the manager may require a second completion of the form to assure that the carrier is thoroughly familiar with its completion.

- 4. The case file includes statements/interviews from multiple Letter Carriers verifying that they did not receive “Dry-Run Count” training within 21 days of the start of the route count and inspection that began on **[date]**.
- 5. None of the Letter Carriers at the **[Station/Post Office]** were provided proper Dry Run” training. This is because no Letter Carrier was provided appropriate forms, given instruction, asked to fill out a practice 1838-C, and had a manager review the form and discuss/explain the results to him/her. This point is verified by the statements/interviews included in the case file.

**Contentions:**

- 1. Management violated Section 217 of the M-39 Handbook and Section 917 of the M-41 Handbook via Article 19 of the National Agreement by failing to conduct a proper “Dry-Run Count” with the Letter Carriers in the **[Station/Post Office]** within the 21 day period prior to the start of the route count and inspection that took place during the period **[dates]**.
- 2. None of the letter carriers at the **[Station/Post Office]** received a proper “Dry-Run Count”. Therefore, they were not provided with the necessary training to properly record information on the PS Form 1838-C.
- 3. Management must be accountable for following their own rules when conducting route counts and inspections. An appropriate remedy request follows:

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

1. That management be instructed not to implement route adjustments based on the data collected during the week of inspection at the \_\_\_\_\_  
**[Station/Post Office]**.
2. That management cease and desist violating Section 217 of the M-39 Handbook and Section 917 of the M-41 Handbook via Article 19 of the National Agreement in the future.
3. In the event management schedules a new route count and inspection at the **[Station/Post Office]**, that all Letter Carriers be provided with proper "Dry-Run" training within 21 days of the beginning of the week of inspection.
4. That management furnish the local union with copies of all training material used in the "Dry-Run" training referenced in # 3.
5. That each Letter Carrier in the **[Station/Post Office]** be 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

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

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

1. Copies if 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/or notifications between local management and the route inspection team/route inspectors.
3. A copy of the route count and inspection schedule for **[date]** through **[date]** at the **[Station/Post Office]**.

I am 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

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: \_\_\_\_\_

# Route Count and Inspection Dry-Run Interview with Letter Carrier

Letter Carrier Interviewed: \_\_\_\_\_

Route # (or UAR, PTF, T-6, TE): \_\_\_\_\_

1. Did you receive any “Dry-Run” training within 21 days before the route count and inspection?
2. If so, did management give you a sample form, a list of mail-count items and a list of time-used items to be used to fill out a practice form?
3. Did management have you practice entering the mail count and time-used items on a practice form?
4. Were you told to turn your practice form back in after you finished filling it out?
5. Did you turn your practice form in after you finished filling it out?
6. Did a manager first review, and then discuss and explain the results of the practice form you filled out with you?

The signatures below affirm that the questions above were asked and the responses to these questions were accurately recorded.

\_\_\_\_\_  
Shop Steward name

\_\_\_\_\_  
Letter Carrier name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Signature

Date \_\_\_\_\_