

Local Grievance # _____

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

Did management at the [Station/Post Office] violate Section 221.131 of the M-39 Handbook via Article 19 of the National Agreement by not allowing Letter Carrier(s) [name(s)] to verify the entire mail count on their assigned route(s) on the day(s) of inspection, 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 all routes at the [Station/Post Office] beginning on [date].
2. Section 221.131 of the M-39 states:

221.13 **General Rules for Making Count**

221.131 The carrier should count and record the mail every day except on the day of inspection when the mail must be counted and recorded by a manager. On one or more days during the count week, each route will be inspected by a manager. When management performs the mail count the carrier serving the route, upon request, may verify the mail count. Where hand-held computers are used on the day(s) of inspection, the route examiner will complete entries on Form 1838-C in the usual manner, except for line item elapsed time totals and mailpiece count totals by category. The calculations remain the same as previously performed manually. The carrier will continue to make timeclock entries on Form 1838-C for beginning, leaving, returning, and ending times. Total mail counts and times will be provided to the carrier on a computer generated facsimile of Form 1838, *Carrier's Count of Mail — Letter Carrier Routes (Mngt. Summary)*.

(Emphasis Added)

3. The step 4 settlements M-00536 and M-00814 make clear that the intent of Section 221.131 of the M-39 handbook is for the Letter Carrier, upon request, to have the opportunity to verify the entire mail count. These settlements state in relevant part:

M-00536:

Normally, a spot verification of the mail volume is adequate to determine that the mail count is accurate. However, the parties agree that based on the intent of Section 221.131 of the M-39 Handbook, the carrier may, upon request, verify the entire mail count.

M-00814:

Normally, a spot verification of the mail volume is adequate to determine that the mail count is accurate. However, the parties agree that based on the intent of Section 221.131 of the M-39 Handbook, the carrier may, upon request, verify the entire mail count.

4. The case file includes statements from the following Letter Carriers showing that they requested, but were not allowed by management, to verify the entire mail count on their assigned route(s) on the day(s) of inspection:

<u>Letter Carrier</u>	<u>Route</u>	<u>DOI-Date</u>
[name]	[route #]	[date]
[name]	[route #]	[date]

Contentions:

1. Management violated Section 221.131 of the M-39 Handbook via Article 19 of the National Agreement by failing to allow Letter Carrier(s) **[name(s)]** to verify the entire mail count on his/her assignment(s) on the day of inspection.
2. Each Letter Carrier has the right to verify the number of mail pieces recorded on the PS Form 1838-C by the route examiner on the day of inspection. This verification is an important check and balance built into the process to ensure an accurate count of the mail is done.

Remedy (Block #19 on PS Form 8190):

1. That management cease and desist violating Section 221.131 of the M-39 Handbook via Article 19 of the National Agreement in the **[Station/Post Office]** in the future.
2. That each affected 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/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.
3. A copy of the Letter Carrier work schedule for the week(s) of **[date]**.
4. A copy of the route count and inspection schedule for **[date]** through **[date]** at the **[Station/Post Office]**.

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: _____