NRLCA Accepts Final USPS Proposal on Handling Delivery Point Sequence Mail

On February 22, 1994, the National Rural Letter Carriers' Association received official notice from the Postal Service on related Handbook and Manual changes associated with the handling of Delivery Point Sequence (DPS) mail, along with the per piece "on the street" handling rate for DPS mail. This is in accordance with the USPS/NRLCA National Agreement, Articles 19 and 34.

During the National Steward Conference, the Board of the NRLCA met and had a lengthy discussion to examine and list its concerns over the notice on PO-603 changes and the street handling rate for DPS mail. The notice contained many shortcomings, as well as a rate that provided no incentive in that element of the time standards.

NRLCA Officers met with the Postal Service on March 14, 1994 to express their displeasure with much of the document and proposed major changes to the document. As a result of that meeting, the NRLCA received another document from the Postal Service on March 17, 1994. The dramatically revised document was Express Mailed to the non-resident officers.

The resident officers spent considerable time reviewing and discussing the revised version with the other Board members. NRLCA Officers again met with the Postal Service on March 24, 1994, to further discuss the proposal and provided additional requests concerning the DPS notice.

On March 28, 1994, NRLCA Officers received the final document from the Postal Service on the implementation of DPS. No changes resulted from the second meeting. Although the NRLCA did not achieve every demand which it put forth, the final document achieves many of its objectives as they relate to the PO-603 changes and the handling rate for DPS. The entire National Board believes that there is no reasonable likelihood of convincing an Arbitrator to give the NRLCA a better rate and implementation procedure than those which it has been able to achieve through negotiations.

When automation was first discussed, the rural carrier craft knew changes in its work methods were inevitable. Sector/Segment mail allowed rural carriers to case mail at a more rapid rate and the standard was changed accordingly. Now, with the implementation of DPS, the Postal Service has proposed additional changes.

Due to the change in NRLCA's Constitution and By-Laws related to the ratification of Memorandums of Understanding, the Postal Service was prevented from continuing to work through the QWL/EI Process. Therefore, the Employer initiated changes under Article 34.

Article 34 provides the principle of the evaluated pay system. This principle is: "a fair days work for a fair days pay". The Employer agrees that any work measurement systems or time and work standards shall be fair, reasonable and equitable. It further states that the Union shall be kept informed during the performance of such studies.

The President of the Union can designate someone to observe the studies being done by the Employer.

If the Union disagrees with the study, the Union can perform its own study. The Employer would then have the right to study the data, the same as the Union can study the data gathered by the Employer. If there is no resolution to the issue, the Union may appeal the case to arbitration. The issue before the arbitrator will be whether the national concepts involved in the new work or time standards are fair, reasonable, and equitable to both the Employer and the employee/Union.

Article 19 requires that the Employer give the Union 30 days advance notice of their decision to implement changes. The Union can request a meeting to discuss the changes within 15 days of the receipt of official notice. The meeting to discuss these changes will be held within 30 days after the official notice. After the meeting, the Union will receive a final written notice of the changes, along with any modifications that may have been made as a result of the meeting. After receipt of this second notice, the Union has 30 days to submit the issue to binding arbitration if the Union believes that the changes violate the National Agreement or that the Union can be more successful through arbitration.

The Postal Service went beyond the scope of Articles 19 and 34, when it allowed the Union to have equal involvement in the joint data collection. Teams of rural carriers and managers were trained in the specifics of data collection for the changes that were taking place in work methods that the Employer was putting into place as a result of automation. The data was jointly collected and jointly analyzed by the parties in the sharing of information required in Article 34. The data consisted of approximately 69,250 pages of information that was verified by the Union, which led to 3,750 pages of data calculations. This data was summarized in order to allow the parties to be able to analyze the results of the study.

One other item that is particularly appropriate for consideration is the Memorandum of Understanding concerning "fair, reasonable, and equitable", which was first incorporated into the National Agreement in 1981. Quoting from this Memorandum:

"The parties recognize the existing evaluated system of compensation to be a fair, reasonable, and equitable method of payment. The parties further recognize that the evaluated system is comprised of elemental standards which may not in every instance be adequate for an individual carrier; nevertheless, the parties agree that the standards, when examined collectively, represent a fair days pay for rural carriers.

Where discrepancies develop in the element of the current route evaluation system, which has been in use for many years, and into the time standards of the system that has been applied to office and road duties, the Employer may undertake studies to correct such discrepancies so long (continued on page 198)

as the changes are consistent with the principles of this Memorandum and Article 34."

In this Memorandum, it is understood by the parties that every element of the time standards may not be appropriate. Neither side can pick and choose one element to point out that there may be too much time credit or another element that may be too little time credit, without looking at the overall route and pay system collectively.

In the meeting held in response to the notice of the Employer's decision to change Handbooks, Manuals and rates for handling DPS mail on the street, the Union strongly urged the Employer to reduce their proposed rate of 32 pieces per minute street handling to a rate of 28 pieces per minute, along with other issues concerning mail count, implementation and monitoring procedures. Upon final notice of the letter of decision, the Employer agreed to lower the per piece handling rate to 30 pieces per minute, and incorporate language to protect the rural carrier. Another major accomplishment was achieved that we were able to convince the Postal Service to allow rural carriers the option to case DPS mail.

In reviewing the study results, and the final notice language which was altered dramatically from the original proposal, the National Board came to the conclusion that it would accept the rate of 30 pieces per minute, with the protections in place to protect the carrier. The bottom line results are that the carriers in the test averaged delivering 631 pieces of DPS mail each day on the street.

It took an average of 20 minutes per day on the street to handle the 631 pieces of DPS mail. This equates to 31.55 pieces per minute, actual time for handling DPS mail on the street, which is about 45% of the letter volume in DPS order.

With the lowered rate of 30 pieces per minute, 1.55 pieces per minute acts as an incentive for handling on the street. This equates to a 5% incentive in the rate of handling over actual time. Based on the study, the Board believed that it would be very difficult to convince an arbitrator that the rate of 30 pieces per minute for handling on the street was not fair, reasonable, and equitable rate for DPS mail.

During discussions, NRLCA Officers became aware of the Postal Service's intention to train Management in conjunction with DPS and rural delivery. We were told that two trainings had been tentatively scheduled for April 25-27 and May 17-19 in Denver, Colorado, and Tampa, Florida, respectively. We were informed that if we had not accepted their final proposal, the Postal Service was prepared to have conducted the training unilaterally, using the language in the original proposal.

However, since the Board had determined that we would not be going to arbitration, the NRLCA will now be jointly participating with the Postal Service in conducting the training. At this time, we expect the AJSCs, DJSC Co-Chairs, the State Steward, a District Representative of Management and Area personnel to be involved in the national training. Since there will be several officers from each state attending the training and since the state convention schedule is beginning soon, as well as the Presi-

dent's Legislative Conference, your state officers have decided not to attempt to hold Area Officer's Meetings.

We are asking States to give the assigned National Officer time during their State Convention to make a presentation on Delivery Point Sequence (DPS) mail, and provide a more detailed explanation of the implementation process. We will also be using the magazine to communicate with and educate the membership on this subject.

Reprinted in this issue are the changes to Methods Handbook PO-603, Rural Carrier Duties and Responsibilities that relate to the implementation procedures and handling of DPS mail on rural routes.

Methods Handbook P0-603, Rural Carrier Duties and Responsibilities, is revised as follows:

131.4 Undeliverable Mail

Forward, hand off to another carrier, or otherwise properly dispose of all undeliverable First-Class Mail before leaving to serve the route or after returning from the route with delivery point sequenced mail that was undeliverable or any other mail which you were not able to complete delivery. Properly dispose of all other classes of mail to be forwarded or delivered to a new address if you can do so and leave at the scheduled time; otherwise, mark up the mail before the end of the day's work. Endorse undeliverable mail with the reasons for non delivery in accordance with 242.21 a.

212.131 Letter Mail. Place letter mail which is to be cased on your case ledge, either in trays or stacked loose, no more than one row high. The mail must face right with stamps down whether you place it loose on the case ledge or work it directly from a tray.

212.21 Routine. If employees other than rural carriers withdraw mail **intended to be cased**, they must place it on your case ledge as described in **212.13**.

213.31 Procedures. (all preceding language in 213.31 remains as written)

b. Arrange labels in the exact delivery order that you serve the route. To the extent practicable, keep segments on the same row. Exception: See 225.5 for carrier segmented mail. [all following language in 213.31 remains as written]

221.22 Sort/Separate for Initial Rows.

After a few minutes of study and with the delivery pattern fixed in your mind, sort the mail **intended to be cased** for the rows you have learned. Separate the remaining mail **intended to be cased** on the case ledge. Place the mail for each street in a separate pile.

221.23 Sort for Remaining Rows. After all mail **intended to be cased** has either been distributed in the case or sorted on the ledge, sort mail for the next street appearing on the labels of the next row. Repeat this pro-

cedure street by street and row by row until all of this mail is cased.

223.1. General

The casing systems used in rural delivery service are divided into three categories: the one-bundle system, the modified one-bundle system, and the two bundle system. In all three casing systems, you may case delivery point sequenced mail, at your option, in accordance with 150, Schedules.

226 Delivery Point Sequence (DPS) Mail.

When mail is provided to you in delivery point sequence order, casing with other letter and/or flat mail is not required. Separator cards are provided in your DPS mail to give you visual assurance that there are no obvious sweeping errors. You and your manager will determine the number of cards and intervals where they should be placed. DPS mail is taken directly to the street and handled as a separate bundle. At your option, you may choose to case DPS mail in accordance with 150, Schedules.

241.33 Procedures 241.331

Immediately after casing all mail intended to be cased, start with the first row of the case and withdraw from the separation all letters that have the same address as the first entry not lined out on Form 3982. Withdraw all undeliverable mail and place it in the appropriate CMU/CFS separation. Return deliverable mail to the separation. Repeat the same procedure for each uncanceled entry on all Forms 3982.

242.3 Accountable and Signature Mail

Return this mail to the accountable clerk and explain why it is undeliverable. under no circumstances must this type of mail be obtained from or returned to the accountable clerk without establishing proper accountability. Return accountable mail or signed receipts for delivered accountable items found in your mail during the delivery process for which accountability was not established prior to your departure for the route as provided in 431.4.

252.1 Acquiring Accountable Items

Obtain accountable items from the finance cage or designated area. You may be called individually, in groups by route number, or by passing a paddle. At some offices, accountable items are delivered to the carrier. When accountable items are found in the mail after you have left for the route, follow normal delivery procedures. Return accountable items or signed receipts for any delivered accountable mail you find in your mail during the delivery process for which accountability was not established prior to your departure for the route.

261.1 Bundles

Strap out all mail cased and, if necessary, mark each bundle in sequence of delivery. You may reverse a letter, or use some other method, as a reminder that a customer has a parcel or other article that has not been cased.

262.3 Delivery Point Sequence (DPS) Mail.

Normally, DPS mail will be brought to your case unless your route receives withdrawal allowance, in which event, you may obtain your DPS mail from carts or another conveyance located in close proximity to the casing area.

341.21 Delivery.

Deliver the article after the customer pays the amount due. Return to the accountable clerk funds for any postage due article found in the mail and delivered while on the route, for which you had not previously signed or paid as provided in 433.1.

341.22 Incomplete Delivery.

Complete and leave Form 3849 when delivery cannot be made. This includes any postage due article found in the mail while on the route, for which you had not previously signed or paid. Endorse the article with the date and your initials and return it to the post office. If, at your discretion, you elect to leave the article for the customer, attach Form 4245, Carrier's Statement In such cases, you are responsible for the amount of postage due. You are accountable for the total amount due for all articles for which you sign a Form 3584, Postage Due Log and for articles found while on the route. You may make a reasonable effort at a future date to collect the amount due from the customer.

421.3 Undeliverable Ordinary Mail Returned from the Route.

Case or dispose of all mail which you were unable to deliver on the route in accordance with handling procedures required for the class and type of mail.

535.12 Completion.

[Columns A through K remain as revised in Postal Bulletin dated 7-23-92]

I, Column L - Delivery Point Sequence (DPS) Letters

Enter in this column all mail up to 6 1/8 inches in width that is processed on automated equipment as Delivery Point Sequence mail. Exception: If less than 2,400 pieces of DPS mail are averaged per week during the entire mail count period, and/or the route was not validated before the count as meeting the 98 percent quality threshold, mail processed as DPS will be cased and recorded as sector/segment mail in Column B on Form 4241, Rural Delivery Statistics Report, or, if it does not qualify as sector/segment mail, entered in Column A, Letter Size, or Column C, Newspapers, Maga-

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zines, Flats, Catalogs and Rolls, as appropriate.

Note: Casing of DPS mail will not change mail count procedures or time standards applied to DPS or other mail.

- m. Column M Money Order Applications. [Re lettered. Instructions remain as written in Handbook PO-603 under Column L]
- n. Column N Letters and Flats Collected. [Re lettered. Instructions remain as written in Handbook PO-603 under Column M]
- o. Column O Ordinary and Insured Parcels Accepted. [Re lettered. Instructions remain as written in Handbook PO-603 under Column N]

[Columns P through Z remain as revised in Postal Bulletin dated 7-23-92]

541.4 Automation Processed Mail

- 541.41 If a carrier on a route being compensated under DPS standards is required to case all or a significant portion (125 pieces or more) of its DPS mail, due to machine failure or other problems, additional compensation will be provided in accordance with the following formula.
- 1) a. The average daily DPS volume from the latest mail count (when <u>all</u> DPS mail is received in a raw, unprocessed state or <u>all</u> DPS mail is improperly processed requiring casing) or,

h actual niece count (when 125 or more

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o) equais accidental minutes payment.

Additional payment procedures will be the same as outlined in Article 9.2.M. of the 1993 Agreement between the USPS-NRLCA. Exception: Carriers may annotate the comments section of Form 4240, Rural Carrier Trip Report, and track DPS pieces which require casing. Form 8127, Rural Carrier Supplemental Payment, can be submitted once an accounting period rather than on an event basis.

Note: Carriers should notify their manager immediately when they receive DPS mail requiring casing. If a manager is not readily accessible, the carrier should note the number of DPS pieces they are required to case and report it to their manager at the first opportunity.

541.42 If a route receiving DPS mail frequently experiences significant decreases in the quality of

the DPS mail or there is a disproportionate reduction in DPS volume in relationship to the total letter volume of the route, the carrier may make a written request asking for a formal review of the DPS processing for the route. If the formal review indicates a zone or route is no longer being properly processed on automated equipment, quality has deteriorated significantly or a pattern of random automated processing is revealed, management will take corrective action to ensure that the processing is returned to levels equivalent to those experienced during the previous mail count period.

However, if corrective action has not resolved the problem within 30 calendar days of the carriers written request, management will prepare a Form 4003, Official Rural Route DescriPtion, discontinuing the application of DPS standards. The DPS volume will be reclassified as sector/segment mail (if processing standards are achievable) or raw mail, as appropriate, and a base hour change made to adjust the route evaluation. The Form 4003 will be processed with an effective date beginning with the first day of the pay period in which the carrier provided written notification requesting a review of DPS processing.

541.43 If, for any reason, management takes a route off of the sector/segment or DPS sort scheme, Form 4003, Official Rural Route Description, will be prepared to appropriately adjust time allowances and processed to be effective on the first day of the pay period in which the automated processing is discontinued.

541.44 If DPS is officially discontinued in accordance with 541.42 or .43 above, and then reintroduced to a route, the negation criteria in Article 9.2.C.12.a.(3) of the 1993 Agreement between the USPS NRLCA may not be used to requalify the route for a special mail count for purposes of applying DPS standards.

541.45 Once DPS or sector/segment mail is introduced to a route, the carrier will begin to record necessary delivery data (boxes/stops, box number or address, residential or business type, etc.) on PS Form 1621, Delivery Management Report, instead of on the back of PS Form 4240, Rural Carrier Trip Report. On an as needed basis, the carrier will complete the rest of the data on Form 1621 and submit it to their postmaster or supervisor. Time required for full completion of the additional data required on Form 1621 will be recorded under Column R, Other Suitable Allowance, in any subsequent mail count.

Note: Other suitable allowance entries should be made in every subsequent mail count and should reflect the average weekly time needed for completion of the additional information required on Form



1621.

DELIVERY POINT SEQUENCING (DPS) IMPLEMENTATION PROCEDURES FOR RURAL ROUTES

Implementation procedures outlined in the Delivery Point Sequencing (DPS) Guidelines issued by Headquarters remain in effect, except as supplemented or modified in this document. Article references contained in this document refer to the 1993 National Agreement between the United States Postal Service and National Rural Letter Carriers' Association.

Prerequisites for New DPS Implementation:

- As soon as practicable after determining a zone will be provided DPS mail, district management will notify the Co-Chairs of the District Joint Steering Committee (DJSC) for the Quality of Work Life/Employee Involvement (QWL/EI) process, the National Rural Letter Carriers' Association (NRLCA) state steward, the affected postmaster, and the affected carrier(s), as to the planned implementation date. For purposes of this document, a zone is any five-digit ZIP Code in a post office, station, or branch. DPS processing will not necessarily be extended to all routes in a building or zone.
- * To the extent possible, QWL/EI DJSCs will be involved in the implementation and monitoring of DPS and in assisting managers, supervisors and rural letter carriers in improving their knowledge and understanding of ZIP 4 and eleven-digit coding, sector/segment and DPS scheme development.
- * Prior to the introduction of DPS mail to an office not already receiving sector/segment mail, rural route edit sheets must be reviewed to ensure compliance with coding conventions (see Management Instruction DM-940-89-03 dated 07/07/89) and the establishment of an accurate data base prior to the activation of a DPS scheme. This review will be jointly conducted by the appropriate postal manager and a rural carrier representative(s) appointed by the DJSC. It is anticipated that the rural representative(s) selected would be either a member of the DJSC, the local QWL/EI work team, a shop steward, or other DJSC appointee. The DJSC representative(s) will be provided training to better understand the coding process so that they may brief and assist individual carriers in their review.
- * Involved carriers will be required to review their individual edit sheets to ensure proper development of DPS sort schemes where management determines it is warranted or where the DJSC representative(s) feels the route scheme data will benefit from the edit review process.
- *Involved carriers will be required to properly sequence DPS validation cards where management or the DJSC representative(s) determine the route scheme data will benefit from the card validation process.
- A communications link must be established between the office processing DPS mail and the office receiving the mail to ensure timely notification and correction of sortation problems. Names and telephone numbers of individ-

uals to contact with problems should be identified for each tour of operation impacting DPS processing.

- * Prior to or within 30 days of initiation of DPS, all affected rural carriers will be provided joint DPS training. All time spent by individual carriers reviewing and assisting in the development of automated mail processing data, and/or viewing training films or presentations, will either be compensated in accordance with Article 9.2.M. or, for those carriers in the QWL/EI process, the time may be accumulated.
- * When DPS is introduced to a two-bundle casing method route, the carrier may elect to convert the route to a one-bundle casing method for the residual letter mail and flat mail, if they take DPS mail directly to the street without casing.

Processing DPS for Rural Routes:

- A rural route receiving DPS mail may be counted and evaluated using the new DPS standard provided:
- 1. the route has been receiving DPS mail for at least 30 calendar days prior to a mail count;
- the DPS mail has met the 98 percent quality threshold for at least three (3) consecutive days prior to the mail count; and
- the route averages 2,400 DPS mail pieces per week during the mail count period.
- If less than 2,400 pieces of DPS mail are averaged per week during the entire mail count period, and/or the route was not validated before the count as meeting the 98 percent quality threshold, mail processed as DPS will be cased and recorded as sector/segment mail in Column B on Form 4241, Rural Delivery Statistics Report, or, if it does not qualify as sector/segment mail, entered in Column A, Letter Size, or Column C, Newspapers, Magazines, Flats, Cataloges/and Rolls, as appropriate.
- * The quality threshold verification should be conducted by the designated Quality Improvement Specialist, or their designee, working with the DJSC representative(s).
- * End of run reports, or other suitable documentation from the automated equipment used to process a zone's mail, must be kept on file to substantiate continued processing on automated equipment. The end of run report volume figures will be considered as one source of DPS volume data and will be made available to the delivery unit manager and involved carriers as necessary. End of run reports will be retained until the next mail count for the route(s) receiving DPS mail.
- * Evaluation changes resulting from special mail counts scheduled due to the introduction of DPS mail, and conducted in accordance with Article 9.2.C.12.a.(3), will not be implemented unless the evaluation of the route is changed by 120 minutes (2 hours) or more.
- * When a route receiving DPS mail is counted under the national count criteria, or special count criteria other than Article 9.2.C.12.a.(3), the resulting route evaluation will be implemented regardless of the amount of time changed.
 - * Separator cards should be used in the DPS tray at rea-

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sonable intervals established by the carrier and approved by local management. This is to give the carrier visual assurance that the DPS mail is in delivery order and that there are no obvious sweeping errors. Fingering or riffling trayed letters to ensure accurate DPS sortation is not required where the separator cards are used in proper sequence.

Rural carriers, at their option, may case and strap out DPS mail with other mail in accordance with Part 150, Schedules, in Methods Handbook PO-603, Rural Carrier Duties and Responsibilities. Carrier casing of DPS mail will not change mail count procedures or time standards applied to DPS mail.

* If a carrier on a route being compensated under DPS standards is required to case all or a significant portion (125 pieces or more) of its DPS mail, due to machine failure or other problems, additional compensation will be provided in accordance with the following formula.

1) a. The average daily DPS volume from the latest mail count (when all DPS mail is received in a raw,

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more pieces

2) multiplied by 0.0520 minutes per piece,

3) equals additional minutes payment.

Additional payment procedures will be the same as out lined in Article 9.2.M. of the 1993 Agreement between the USPS-NRLCA Exception: Carriers may annotate the comments section of Form 4240, Rural Carrier Trip Report, and track DPS pieces which require casing. Form 8127, Rural Carrier Supplemental Payment, can be submitted once an accounting period rather than on an event basis.

Note: Carriers should notify their manager immediately when they receive DPS mail requiring casing. If a manager is not readily accessible, the carrier should note the number of DPS pieces they are required to case and report it to their manager at the first opportunity.

If a route receiving DPS mail frequently experiences significant decreases in the quality of the DPS mail or there is a disproportionate reduction in DPS volume in relationship to the total letter volume of the route, the carrier may make a written request asking for a formal review of the DPS processing for the route. If the formal review indicates a zone or route is no longer being properly processed on automated equipment, quality has deteriorated significantly or a pattern of random automated processing is revealed, management will take corrective action to ensure that the processing is returned to levels equivalent to those experienced during the previous mail count period.

However, if corrective action has not resolved the problem within 30 calendar days of the carriers written request, management will prepare a Form 4003, Official Rural Route Description, discontinuing the application of DPS standards. The DPS volume will be reclassified as sector/segment mail (if processing standards are achievable) or raw mail, as appropriate, and a base hour change made to adjust the route evaluation. The Form 4003 will be processed with an effective date beginning with the first day of the pay period in which the carrier provided written notification requesting a review of DPS processing.

* If, for any reason, management takes a route off of the sector/segment or DPS sort scheme, Form 4003, Official Rural Route Description. will be prepared to appropriately adjust time allowances and processed to be effective on the first day of the pay period in which the automated processing is discontinued.

*When DPS mail is introduced, a route can qualify for a special count under Article 9.2.C.12.a.(3). If DPS is discontinued in accordance with the requirements stated in these guidelines, and then reintroduced to a route at a later date, the negation criteria in Article 9.2.C.12.a.(3) may not be used again to requalify the route for a special mail count for purposes of applying DPS standards.

* Once a route is counted under the DPS standard, the obligation to rebuild that route with available buffer is limited to the route evaluation at the time an Exhibit 1 route adjustment waiver was signed or the evaluation of the route at the time of the mail count, whichever is greater. Rebuilds after the introduction of DPS mail are not to exceed a 47K evaluation. Route rebuilds will not exceed a 46K evaluation upon achievement of 60 percent DPS volume. Any rebuild should be in conformance with required procedures and should be done as quickly as possible after the effective date of the mail count.

* After being counted under DPS standards (or determined not to be eligible for DPS), any regular route that remains vacant after all routes in a unit are rebuilt should be posted and filled in accordance with the provisions of Article 12.3.A. after the designated manager and state steward make a final review. During this review and before allowing the route to be posted, the parties should consider possible increases in the percentage of DPS mail, changing from rural box numbers to street name and house number addresses, growth in the area, and any other elements which would impact route evaluations.

After all routes in a unit are counted under DPS standards and rebuilt (or determined not to be eligible for DPS), any auxiliary route evaluated in excess of 39:00 hours should be jointly reviewed by the designated manager and state steward to determine if it should continue to be held for buffer. During this review, the parties should consider possible increases in the percentage of DPS mail, changing from rural box number to street name and house number addresses, growth in the area, and any other elements which would impact route evaluations. If it is determined that the route no longer needs to be considered for buffer, the route should have had at least one official count in which the evaluation exceeds 39:00 hours before consideration is given to converting it to regular status.

Routes counted under DPS standards and rebuilt should be deleted from the list of flagged routes that have signed an Exhibit 1 adjustment waiver and are eligible for additional compensation unless it is determined that significant amounts of additional volume presently being received by the route are likely to shift to DPS. The designated manager and NRLCA state steward should jointly review these routes to make this determination.