



NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

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February 11, 2015

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Return Receipt Requested
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Dear Ms. Perron:

Pursuant to Article 15, Section 4(D), of the parties' National Agreement, the NRLCA submits this National Level grievance on the following issues related to the Postal Service's expansion of its Carrier Pickup Program:

1) On or about October 16, 2014, the NRLCA became aware of a Postal Service service talk which discussed the Postal Service's expansion of its Carrier Pickup Program to include new qualifying pieces. The Union's Director of Labor Relations inquired at the USPS Headquarters level whether the Union could expect the appropriate Article 19 notification regarding the changes to the program as these changes affect rural carrier terms and conditions of employment. No Article 19 notification to the Union has been given to this date. Apparently, on or about October 30, 2014, the Postal Bulletin published the changes to the Carrier Pickup Program noted in the October 16, 2014 service talk. As of February 9, 2015, even the Postal Service's Manager, Contract Administration (NRLCA) was unaware of the October 30, 2014 Postal Bulletin's publication of the Carrier Pickup Program changes.

2) Notwithstanding the absence of Article 19 notification to the Union, on or about January 16, 2015, the Postal Service's Manager, Contract Administration (NRLCA), the Postal Service's Manager of Rural Delivery, and the NRLCA agreed in a series of emails and telephone conversations that the new qualifying pieces (including, but not limited to, First Class Package Services, Parcel Select, and First Class Package Return Services) would be counted as Carrier Pickup items in the 2015 National Mail Count which began on February 7, 2015. Between January 16, 2015 and February 7, 2015, the Postal Service promised the

Union that it would make clear to the field through updated mail count training presentations and other means that the new qualifying pieces would be counted as Carrier Pickup items, which receive more credit in the evaluated system than letters and flats collected. For reasons unknown, for several days before and now during the mail count, multiple Postal Areas and Districts advise that the new qualifying pieces will not receive Carrier Pickup credit potentially affecting rural carrier route evaluations and ultimately rural carrier annual salaries. Curiously, reports from the field suggest that USPS Headquarters advised field managers that the parties were still negotiating the appropriate credit for the new qualifying pieces at the National level. There are no such negotiations as the parties at the National level have already agreed to provide Carrier Pickup credit for the new qualifying pieces. USPS Headquarters personnel have failed to properly communicate to the field and/or correct the understanding in multiple Postal Areas and Districts relative to the parties' agreement regarding the new Carrier Pickup items. These failures will result in rural carriers not receiving the appropriate credit in the mail count, which may adversely impact rural route evaluations and the annual compensation provided to rural carriers.

By its actions described above, the Postal Service has violated the National Agreement, including but not limited to Articles 5 and 19 as well as Sections 8(a)(1) and (5) of the National Labor Relations Act. As remedy, the NRLCA requests that all rural routes counting during the 2015 National Mail Count receive Carrier Pickup credit for all disputed pieces and that base hour changes to route evaluations be made as of the effective date of the 2015 National Mail Count. The Union also requests appropriate backpay and interest at the Federal Judgment Rate. In addition, due to the Postal Service's failure to provide the Union with Article 19 notice of the changes to its Carrier Pickup program, for routes that did not count, the NRLCA requests that regular rural carriers, at their option, require the Postal Service to conduct a two-week study of all new Carrier Pickup requests and pieces at a time selected by the Union. The results of the two-week study shall then be compared to the Carrier Pickup results from the last mail count. In cases where the two-week study results are greater than the results of the last mail count, a base hour change will be made and backpay and interest will be provided as of the effective date of the 2015 National Mail Count.

The Union requests a meeting to discuss this grievance at your earliest

Sincerely,


Jeanette Dwyer
President, NRLCA

JD/tl

cc: General Counsel
National Board
File