



NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

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May 31, 2022

Ms. Cathy Perron
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Dear Ms. Perron:

Pursuant to Article 15, Section 4(D), of the parties' National Agreement, the Association submits this National-Level Grievance.

In dispute is the Postal Service's action to begin data collection and implementation of the Rural Route Evaluated Compensation System (RRECS) on May 21, 2022. This action is in violation of, but not limited to, Article 5 of the Collective Bargaining Agreement and the ***Final Determination, Rural Route Evaluated Compensation System (RRECS)***, Submitted to USPS and NLRCA by: Dr. Louis Martin-Vega, Chairperson, Dean of the College of Engineering, North Carolina State University, May 31, 2018. Specifically, this action is in violation of pages 75-76 of that document:

*“The RRECS Validation Plan of October 7, 2015 (Appendix Support Document 40) consisted of five components: validation of (1) Counts (2) Engineered Standards (3) Drive Speed Standards (4) Business Logic, and (5) Route Evaluations. **Except for specific requirements mentioned in this document, validation of the first four components has been completed.***”

The main role of the Panel in this project has been to establish the technical requirements for RRECS and to advise, monitor progress and assess outcomes. The teams have been responsible for the actual design and development of the various components. While the Panel developed the validation plan, its role in completing it has depended for considerable time on the completion of the system by the teams. The system is not yet complete, and it is simply impossible to validate RRECS completely until it is.

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*While the Chairperson acknowledges the concern of the NRLCA regarding the fifth component of validation, it is his opinion that the Panel has done everything to this date **within its purview and responsibility** to complete the validation of Route Evaluations. It is also the Chairperson's decision, as part of his final determination, that the **completion of the validation of the Route Evaluations is required before RRECS can be implemented**. Given the termination of the role of the Panel in this project, **responsibility for completion of this final validation task, to their mutual satisfaction, lies in the hands of the parties.**" (Emphasis in original)*

The parties originally drafted a Memorandum of Understanding (MOU) for implementing RRECS in which data collection using RRECS activity scans would begin on March 12, 2022. This MOU was never signed by the parties because the programming update for the MDD Devices utilized by rural carriers was delayed and the training provided to rural carriers by local managers was woefully inadequate.

On March 31, 2022, the parties signed a Memorandum of Understanding (MOU), agreeing to a process for implementing RRECS. The MOU set April 23, 2022, as the beginning date for the collection of RRECS activity scan data for the purpose of calculating the first route evaluations under RRECS. The parties discussed several issues that needed to be clarified and several pieces of information and data that were to be provided to the Union before implementation of RRECS could proceed.

On April 15, NRLCA President Ronnie Stutts emailed a letter to USPS Vice President, Labor Relations Thomas Blum, and USPS Manager of Contract Administration-NRLCA, Cathy Perron, expressing the Unions concerns. The same letter was mailed via US Mail on April 22, 2022, to Deputy Postmaster General Douglas Tulino along with Mr. Blum and Ms. Perron. It reads, in part:

“We recently agreed to yet another delay in implementation when it became clear that field managers and local managers could not or would not complete the very basic task of training rural carriers on the proper use of the new RRECS Activity Scans/Entries on the MDD. So, the "go live" date for collection of Activity Scan Data was postponed until April 23, 2022.

As we quickly approach that date, it has become clear to the NRLCA that we are not much closer to a successful start of the data collection period and the new RRECS program than we were a few weeks ago.

Attached you will find a list of questions and concerns that were shared with Labor Relations and RRECS coordinators at the headquarters level on April 8, 2022. **All of these questions remain unanswered, and all of the issues remain unresolved.** These questions and issues are absolutely essential to the success of RRECS. We simply cannot move forward until all of these issues are resolved.

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We therefore implore you to postpone the data collection period until all of the issues listed below are resolved to the satisfaction of both parties. If left unresolved, these issues will destroy the carriers' confidence in the system and any chance of its success.”

The letter included a list of 47 areas of concern which the Union believes must be resolved before implementation of RRECS can move forward. It includes providing adequate and proper training to managers and rural carriers on the use of RRECS activity scans, a request for the formula being used to calculate the coverage factor, a document containing the complete business logic for calculating route evaluations, a complete list of all data point and their origin, the data sourced for pre-sorted and machine-sorted flats, and various other information and clarifications. This information requested is absolutely vital to the Union’s efforts to independently validate the calculation of route evaluations under RRECS. The Union implored the Service to postpone the data collection and implementation of RRECS until the information was provided and the issues resolved.

Some discussion ensued between the parties and a few of the issues listed have been clarified and resolved. However, information essential for the validation of RRECS evaluations (most important of which are the data sources and the business logic) have not been provided to the Union as of this date.

The Postal Service has made clear to the Union that data collection went live on May 21, 2022, and the Service fully intends to implement RRECS and calculate rural route evaluations beginning on that date.

Therefore, the NRLCA's remedial request includes, but is not limited to:

1. Indefinite postponement of both the collection of RRECS activity scan data and the calculation of rural route evaluations under RRECS until a date that is **mutually** agreed upon by the parties.
2. The Postal Service shall clarify, to the satisfaction of the Union, any remaining issues listed in the Stutts letter of April 15, 2022.
3. The Postal Service shall provide to the Union:
 - a. A plan for including RRECS activity scans in the rural training academy curriculum.
 - b. A complete description of the final business logic of RRECS which would allow the Union to validate the accuracy and compliance with the Panel’s Final Determination.

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- c. A complete list of the data sources for all RRECS data points including volume data and MDD entry data.
 - d. The complete and final method, logic, and data sources for calculating the coverage factor to be applied under RRECS.
4. The Postal Service shall make available in each local office, a daily report for the rural carrier to verify all RRECS activity scan data and all mail volume data. This report shall be made available on the delivery day to any rural carrier who requests to review the information.
 5. The Postal Service will also provide to the Union each pay period, a consolidated report consisting of the above RRECS scan and volume data for every rural route in the country.

Please contact my office to determine the earliest date for us to discuss this very important issue.

Sincerely,



Ronnie W. Stutts
President
National Rural Letter Carriers' Association

RWS/sws

cc: NRLCA National Officers
NRLCA Legal Counsel
File

Enclosures