UNITED STATES
POSTAL SERVICE

NATIONAL ASSOCIATION OF LETTER CARRIERS USA
RECEIVED
MAR - 9 2015
NALC REGION 8

STEP B DECISION

STEP B TEAM
Betsy Davis, USPS
Paul F Glavin, NALC

District: Tennessee
DRT Number: 077-15

Decision:	**IMPASSED**
USPS number:	C11N-4C-C 14306320
Grievant:	Class Action
Branch Grievance Number:	B4-00729-14
Branch:	4
Installation:	Nashville
Delivery Unit:	Belle Meade
State:	Tennessee
Incident Date:	08/23/2014
Date Informal Step A Initiated:	09/22/2014
Formal Step A Meeting Date	01/09/2015
Date Received at Step B:	01/12/2015
Step B Decision Date:	03/04/2015
Issue Code:	14.2100, 19.1000
NALC Code:	508399

ISSUE:

1. Did Management violate Articles 5, 14, 15, and 19 of the National Agreement when they began staging mail directly on the ground at carrier's cases rather than in flat tubs? If so, what is the appropriate remedy?
2. Did Management violate Articles 17 and 31 of the National Agreement by not providing requested documentation? If so, what is the appropriate remedy?

DECISION:

The Dispute Resolution Team (DRT) has decided to declare an **IMPASSE.** The Step B Team has considered all arguments and evidence in the case file and any of this material may be cited in the event of arbitration. The NALC National Business Agent may appeal this grievance to arbitration within fourteen (14) days after the receipt of this decision.

UNION'S POSITION:

The Union at Formal A Representative effectively presented the facts and contentions. All of the arguments raised by the Union at the Informal and Formal Step A meetings are brought forward to Step B and at Arbitration. The Step B representative would like to add the following:

National Arbitrator Aaron decision C-04085 dated January 25th, 1984 reads in relevant part as follows:

> It is now well settled that the parties to arbitration under a National Agreement between the Postal Service and a signatory Union are barred from introducing evidence or arguments not presented at preceding steps of the grievance procedure, and that this principle must be strictly observed.

The Union at Step B notes there are no statements or interviews provided by Management in this grievance file to dispute the Unions Contentions or support any argument contended by Management at the Formal Step A Level. The Union further contends Management had every opportunity to interview or present a management statement at the Formal Step A level as a witness or to rebut the Unions full and detailed contentions, but chose not to in this instance. Managements sole contentions are only relevant to they are following the Eastern Area and the AMSOP.

Page 14-2 of the JCAM reads in relevant part as follows:

> It is Management's responsibility to provide safe working conditions; it is the Unions responsibility to cooperate and assist Management in its efforts to fulfill this responsibility

The Union contends Management failed to fulfill the responsibility of this obligation when they unilaterally rescinded the method which the parties at the National Level were advocating as the safest procedure for letter carriers to perform their jobs. The grievance file contains extensive documentation which reveals the Union at all levels has fully engaged with Management in an effort to assist in providing the safest working conditions possible for employees. It also contains evidence Management rescinded innovative ergonomic policies already in place in the Tennessee District which were intended to reduce the number of injuries which are products of muscular skeletal disorders caused by or enhanced by the manner that individuals move their bodies in the course of performing everyday tasks

The Economic Strategic Partnership Between Occupational Safety and Health Administration and United States Postal Service and United States Postal Service Unions is an 8 page agreement with numerous specific references to the parties commitment to the implementation and study of ergonomics in the workplace. It reads in part as follows:

> The USPS,NPMHU,APWU, and OSHA will work cooperatively to implement an ongoing process to identify MSD's early and control the risk factors that can cause injuries and illness to postal employees.

The grievance file contains Section 811.22 of the ELM Handbook which reads as follows:

811.22 Vision Statement

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the OSHA Voluntary Protection Programs (VPP). (See 811.25.) **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction** Program and joint labor–management safety and health committees (see 816). Bold and underline added)

The above provision in Section 811 of the ELM Handbook states the Postal Service will demonstrate a commitment to integrate safe work practices in ALL services. The following documentation in the grievance file reveals the lack of commitment Management in the Belle Meade Station has demonstrated to the Postal Services investment into the safety of their employees.

Page 1 of the Ergonomic Risk Reduction Program (ERRP) and NALC/USPS Safety and Health Pilot Program clarifies the intent of the parties in this program as follows:

> **ERRP is a program, the goal of which is to reduce all injuries that are products of muscular skeletal disorders that are caused by or enhanced by the manner that individuals move their bodies in the course of performing everyday tasks...The two subject programs are supported by both the National Leadership of the USPS and NALC,** as well as the undersigned, and are attempts to collectively raise awareness among Managers, NALC Representatives, and city delivery carriers that safety is all of our responsibilities, and to provide processes by which we can collectively work to reduce accidents and injuries. (Bold and Underline added)

The Union contends the Postal Service at the National Level has put forth the proposition they will become a leader in reducing work related injuries by demonstrating a commitment to integrate safe work practices into all of its services. It also notes the subject programs are supported by both parties at the National Level. Management in the Belle Meade Station has ignored this commitment by the Postal Service when they failed to implement and refused to consider utilizing ergonomically sound safety practices into the standard operating procedures of daily letter carrier work. Letter carriers and local Union representatives have made Management aware of their responsibilities and safety concerns via contractual provisions and National Level agreements in an attempt to correct the situation prior to addressing this safety issue in the grievance procedure.

The EL-809 Handbook reads in relevant part as follows:

> Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

Correspondence Detail dated 11/15/2013 reads in relevant part as follows:

> The Postal Service proposes to revise Handbook EL-809, Guidelines for Area/ Local Joint Labor-Management Safety and Health Committees. **This revision focuses on consideration of ergonomic safety by Area/Local Safety and Health Committees**. (Bold and underline added)

Changes to Handbook EL-809 regarding Duties and Responsibilities of Committee Members read in relevant part as follows:

All Local Safety and Health Committee Members
2. Create and maintain an interest in safety and health and **ergonomics** and thereby help to prevent accidents.
6. Review employee safety and health **and ergonomic** suggestions.
7. Review safety **and ergonomics** training records to determine if all employees are receiving appropriate training.

Page U41 of the Unions Contentions reads in relevant part as follows:

> **Agenda Items:** Special Items: This will include safety and ergonomic education presentations; results of on the spot inspections of troublesome areas with recommendations and action taken.

Changes to Handbook EL-809 were proposed by the USPS and adopted in November 2013. The Postal Service implemented these changes to Handbook EL-809 with emphasis to highlight the Service's commitment of practices meant to encourage the enforcement of ergonomically sound policies at the local level. The Union contends Belle Meade has emerged as a 'troublesome' area and notes there have been no on the spot inspections instigated by Management as well as no recommendations or positive action taken to resolve the concerns of the carriers.

Changes to Handbook EL-809 regarding Duties and Responsibilities of Committee Members read in relevant part as follows:

> 8. Review Forms 1767, Report of Hazard, Unsafe Condition, or Practice, and responses or corrective action taken.

The Union contends there is no documentation included in Managements contentions which reveal any of the employees concerns or ergonomic suggestions were taken into consideration by the Committee Members when they completed and submitted PS Form 1767 in accordance with the provisions of Handbook EL-809 or the ELM Handbook in reference to the Services ergonomic policies.

Management Contentions reads in relevant part as follows:

> Several of the carriers filed a 1767, Report of Hazard, Unsafe Condition or Practice. The general consensus was that staging flats on the floor loose, not in flat tubs is hard on their backs, knees, and excessive repetitive motion.

The Union contends 7 letter carriers in the Belle Meade Station submitted PS Form 1767 to Station Manager Eric Baxter and Supervisor Beverly Montgomery. Each form explained in detail how the change in policy in performing everyday tasks is personally impacting their body and how it may lead to potential adverse and negative impact on their wellbeing. The effects and potential hazards they describe fall within the terminology and definition the National parties agree upon in the Ergonomic Risk Reduction Program.

PS Form 1767 (reverse) instructs USPS Supervisors as to their responsibilities and obligations when they have received a Report of Hazard, Unsafe Condition or Practice from an employee. It reads in relevant part as follows.

a. Investigate the alleged hazard during the same tour of duty in which the report was received.
b. Abate the hazard if it is within the scope of your authority to do so.
c. Record the action taken to eliminate the hazard

PS Form 1767 (reverse) instructs the Approving Official as follows:

a. Initiate action to eliminate or minimize the hazard.
b. If you determine that there are no reasonable grounds to believe a hazard exists, notify the employee in writing within 15 calendar days. Safety personnel will assist you in this determination when requested.

Management contentions read in relevant part as follows:

> "The supervisor, Beverly Montgomery, responded with the same answer on all 1767's. The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks of no more than 3 feet high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."
> The manager, Eric Baxter, responded to all the same also:
> "Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

The Union contends the same generic answer notated on each individual PS Form 1767 reveals the lack of effort and casual attitude Management in the Belle Meade Station has assumed when addressing safety concerns of its employees. Each employee was concerned about the potential for injuries caused by prolonged repetitive movement. There is no documentation provided as evidence any investigation was conducted in accordance with PS Form 1767 (reverse) to determine the specific concerns of each employee was properly taken into consideration prior to Management concluding there were no reasonable grounds to determine a hazard exists. The Station Manager and supervisor dismissed these concerns as good housekeeping issues, instructed the carriers on local standard operating procedures and further instructed them to be safe entering and exiting their work areas by exercising proper egress . Supervisor Montgomery also stated refresher training would be provided to all employees for proper lifting. There is no documentation in the grievance file as evidence this training was provided in accordance with her own determination of action to be taken.

Management contentions read in part as follows:

> Management is abiding by the Eastern Area and AMSOP.

The Union contends Management has submitted the AM SOP as the sole attachment to support their contentions of rescinding and refusing to provide ergonomically sound resources in an effort to assist letter carriers to perform their duties as safely possible. The relevant documentation below reveals the parties at the National Level are committed to implementing new and safe methods in an attempt to minimize MSD injuries in the workplace. Management in the Belle Meade Station sole contentions conveys the fact they are placing operating procedures over the safety and health of

their employees. The financial considerations of the Service are severely comprised when they refuse to recognize the impact long term worker compensation costs are in relation to penny foolish cost cutting to achieve short term goals.

The U.S. Postal Service Office of Inspector General released the following relevant information in 2014:

> Despite the Postal Service's attempts to decrease the number of employees (19 % since 2008), its workers compensation costs have increased 35 percent.

Section VII of the EL-814 USPS Handbook, Postal Employees Guide to Safety reads as follows in relevant part:

> A. Lifting Guidelines
> Lifting is so much a part of our everyday activity that most of us do not think about it, but it's often done incorrectly. The result can include strains, pulled muscles, disc lesions, or painful hernias.

The grievance file contains a statement from NALC Director of Safety and Health, Manuel L. Peralta Jr which reads in relevant part as follows:

> On or about March 1, 2011, the USPS provided the NALC with an update as to ergonomics in the form of a Power Point Presentation. A review of this information shows that 22% of the MSD's suffered by letter carriers occurred in the office.

The same Power Points Presentation page contained a page titled, 'Common High Risk Work Methods or Hazards and Solutions' reads in relevant part as follows:

> 1. **Getting the Mail off the floor** – Tables, tub racks, & upside down flat tubs

The Union contends the above statement was provided by and is substantiated in the grievance file by the USPS's own data which is printed off in Power Point Presentation form. The Postal Service provided this to the NALC in support of the USPS commitment to provide innovative and proactive measures to create an ergonomically sound policy which would benefit the health and well-being of its workforce, as well as provide economic and financial benefits to the Service. The Power Points Presentation provided by the USPS at the National Level concludes with a finding that elevating the mail off the floor with tables, tub racks, and upside down tubs are a solution by to the potential hazard caused by the repetitive motion of bending and lifting the mail off the floor.

Section 833.1 of the ELM Handbook reads in relevant part as follows:

> **833.1 Standards, Ergonomics, and Engineering**
>
> OSHA and applicable consensus safety and health standards, **ergonomic considerations,** and sound safety and fire protection engineering techniques must be used to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment, equipment, tools, supplies used, and the material on which work is performed.**
>
> Purchasing, delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.

NALC Director of Safety and Heath, Manuel L. Peralta Jr provided a statement in this case which reads in relevant part as follows:

Ergonomics Enters the Letter Carrier Craft

> The USPS and NALC committed to bringing the principles of ergonomics into customer service following the positive outcome of the ergonomics program in mail processing. The USPS and NALC pilot tested a roll out in Albany, New York. Subsequently the USPS and NALC agreed to select the San Diego District to expand ergonomics with other districts to follow...Following the experiences and knowledge acquired through our joint efforts on ergonomics with customer service, **the national parties decided to establish a document to share this information with all parties in the field.**

This document (M-01773) signed on April 24, 2008 by NALC President William H. Young and Doug Tulino, Vice President of Labor Relations reads in relevant part as follows:

> Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling of mail. Pilot testing and the customer service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may reduce injuries and Muscular Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects.

The Union contends the elevation of mail is the subject of the dispute between the parties in this grievance and notes this has been addressed by the parties at the National Level in a joint effort to reduce the number of ergonomically related injuries in the work force. One of the three tools suggested by the parties is Mail Elevation Units. 'Milk crates' used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height. Mr. Peralta's statement, as well as the document signed by the parties at the National Level, is evidence of a mutual understanding that injuries associated with the repetitive motions of bending, lifting, and the handling of mail may be reduced with the implementation of ergonomically sound safety procedures.

The grievance file contains an E-Mail transmission dated at 10:14AM October 18, 2013 from Corey Walton to Patricia King who was Safety Manager at the time, which reads in part as follows:

> I just go back from Washington and have a lot to share...Concerning the Ergo topics; **I brought up a concern to them in our telecom about tubs being removed from carriers in Antioch. At the face to face, the head of ergonomics was there as well as the head of OSHA compliance. They were not happy with that decision and said they would be more than happy to look into that if we couldn't get a favorable outcome to that. I think that the tubs should be provided the carriers asap and the mail be placed in those instead of on the floor**...The head of OSHA stated that the district has $10,000 to use for safety and ergonomics...**They want the mail to be at least knee high and at the moment their mail is sitting on the ground...**I don't know who needs to be called or what needs to be done to get them tubs by tomorrow and get that mail off the floor until we can get these crates, but I have numbers of people at National if we get no response here...The Director of Safety and Health, Linda DeCarlo and Christina Johnson, the Occupational Safety and Health Specialist were part of the committee and were impressed with our district.(Bold added)

Safety Manager King replied to Mr. Walton at 10:51. The Email transmission reads in relevant part as follows:

> See what you can find out about Antioch. I have the poom looking into it. I feel the supervisor is not being honest. **Regardless, mails should never at no time ever be sitting on the floor. At any point for any length of time.** (Bold added)

The grievance file contains an Email transmission sent by Corey Walton dated October 22, 2013, which reads in relevant part as follows:

> **Ergonomics is trying to push certain item. The crates elevate the mail off the floor. They want mail to be above the knees...**If there is a push for something, I would like the TN District to be ahead of the pack.

The Union contends the above statements are evidence Management and the Union had a mutual understanding in the TN district of the importance of ergonomics in 2013. The parties were working with the head of ergonomics and OSHA compliance at the National Level in this matter to ensure mail should not be placed on the floor. Safety Manager King was aware of this commitment and reminded Corey Walton that mail should never be on the floor at any point for any length of time. The Union also notes the parties were very impressed with the direction which was being taken at this time on the subject of Ergo topics, and had allocated $10,000 to further the commitment to this policy in the TN District.

The Union has included the minutes of the Tennessee District NALC Task Force meeting dated July 31, 2014 as evidence this commitment had changed. It reads in relevant part as follows:

> Dave Clark asked about flat tubs in the offices. **Charisse explained that flat tubs <u>will not</u> be used to stage bulk mail in the stations and associate offices. <u>Bundles of mail will be staged directly on the floor</u> at the carrier's case.** (Bold and underline added)

The Union contends the above statement directly contradicts the parties understanding of making sure mail is elevated off the floor and above the knees is an ergonomical priority in the district. An ergonomically sound practice had been in place for many years, and was obviously being adhered to in 2013. Management unilaterally chose to discontinue this policy in 2014 in favor of an AMSOP which the Union contends falls short of the responsibilities the parties have agreed to implement in an effort to lessen the likelihood of repetitive motion injuries.

Page 5-1 of the JCAM reads in relevant part as follows:

> **Prohibition on Unilateral Changes. Article 5 prohibits management taking any unilateral action inconsistent with the terms of the existing agreement** or with its obligations under law. Section 8(d) of the National Labor Relations Act prohibits an employer from making unilateral changes in wages, hours or working conditions during the term of a collective bargaining agreement.

Page 5-2 of the JCAM reads in relevant part as follows:

> **Article 5 may also limit the employer's ability to take a unilateral action where a valid past practice exists.** While most labor disputes can be resolved by application of

the written language of the Agreement, it has long been recognized that the resolution of some disputes require the examination of the past practice of the parties.

The Union contends Management in the Belle Meade Station violated Article 5 of the National Agreement when they unilaterally terminated the existing past practice of allowing letter carriers to have the mail at their cases staged in tubs.

Page 5-2 of the JCAM reads in relevant part as follows:

> **Defining Past Practice**
> In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past Practice

National Arbitrator Mittenthal clarifies the definition of Past Practice on Page 5-2 of the JCAM, which reads in relevant part as follows:

> • First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.
> • Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.

The Union contends the documentation provided in this grievance file proves the mutually accepted procedure of staging bulk flat mail in the Belle Meade Station is clear, consistent, and unambiguous. The Union has submitted documentation in the grievance file as evidence this practice has been the ongoing and mutually accepted way of performing these duties since at least 1965. The letter carriers in the Belle Meade Station have submitted 21 statements to provide evidence there has been no change or dispute that the method the parties have used for almost 50 years is the correct and proper way to have flats staged. The Union contends Management never disputes in their contentions this has been the long established practice of performing these duties.

National Arbitrator Richard Mittenthal decision (N8-NAT-006) dated July 10, 1979, reads in relevant part as follows:

> "**Past practice may serve to clarify, implement, and even amend contract language, but these are not its only functions. Sometimes an established practice is regarded as a distinct and binding condition of employment, one which cannot be changed without the mutual consent of the parties.** Its binding quality may arise either from a contract provision which specifically requires the continuance of existing practices or, absent such a provision, from **the theory that long-standing practices which have been accepted by the parties become an integral part of the agreement with just as much force as any of its written provisions** . For a detailed explanation of these principles, see my article, "Past Practice and the Administration of Collective Bargaining Agreements",59 Michigan Law Review 1017 (1961) ." (Bold added)

National Arbitrator Mittenthal describes the last elements of determining a past practice on Page 2 of the JCAM. It reads in relevant part as follows:

• **Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct**. Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.

• **Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality**. Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment."

The Union contends Management has not submitted evidence to show there have been disputes by the parties on how the staging of mail at carrier's cases was to be conducted prior to the unilateral change implemented in 2014. Management does not submit evidence to dispute carrier statements this was the customary means of handling this situation for the past 49 years. The Union contends in the absence of clear language defining this work, there has been a mutually accepted long time practice established in the Belle Meade Station to stage bulk mail in flat tubs at their case. The longevity of this practice is consistent with Arbitrator Mittenthal' s conclusion that this has been accepted by the parties and has become an integral part of the agreement with just as much authority as any of its written provisions.

On page 5-3 of the JCAM, the parties agreed to the following language National Arbitrator Mittenthal created to define a Past Practice.

> **To Implement Separate Conditions of Employment.** Past practice can establish a separate enforceable condition of employment concerning issues where the contract is "silent." This is referred to by a variety of terms, but the one most frequently used is *the silent contract*. For example, a past practice of providing the local union with a file cabinet may become a binding past practice, even though there are no contract or LMOU provisions concerning the issue.

National Arbitrator Mittenthal states when the parties have established an accepted Past Practice to determine how these duties should be completed; it becomes part of a silent contract over a period of time. The Union contends there is no clarifying provision in the National Agreement or Handbooks which identifies the function of performing this duty. The parties have created a silent contract which has endured for at least 49 years according to the evidence in the grievance file. Staging flats in tubs has become the binding practice to determine how the staging of mail at carrier's cases is performed.

Arbitrator Eileen Cenci decision (B06N-4B-C09175879) reads in relevant part as follows:

> Management unilaterally changed the past practice without giving the Union adequate prior notice and without engaging in good faith bargaining over the impact of the change. The clean case policy is to be rescinded and the practice of permitting carriers to keep personal items at their cases is to be reinstated.

On Page 5-3 of the JCAM both parties agreed to the following:

> **Changing Past Practices**
> The manner by which a past practice can be changed depends on its purpose and how it arose. Past practices that implement or clarify existing contract language are treated differently than those concerning the "silent contract."
>
> **Changing Past Practices that Implement or Clarify Contract Language. If a binding past practice clarifies or implements a contract provision, it becomes, in effect, an unwritten part of that provision. Generally, it can only be changed by changing the underlying contract language, or through bargaining.** (Bold added)

On Page 5-4 of the JCAM both parties agreed to the following:

> **Changing Past Practices that Implement Separate Conditions of Employment.** If the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice. **Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit.**(emphasis added)

The Union contends Management did not offer any contentions to dispute there was a valid Past Practice in the Belle Meade Station prior to attempting to terminate this practice. The National Agreement does not contain permissive language and reminds Management Article 5 prohibits them from unilaterally terminating a past practice and mandates they MUST engage in good faith bargaining prior to attempting to make a change.

The Union contends the Postal Service at the National Level has put forth the proposition they will become a leader in reducing work related injuries by demonstrating a commitment to integrate safe work practices into all of its services. The grievance file reveals the development and implementation of ergonomic policies has become a priority in their effort to significantly reduce the number of compensable work related injuries. These policies were in place in the Belle Meade Station until Management unilaterally eliminated the practice of staging flats in tubs and chose to place them directly on the floor. The documentation in the Unions contentions provides evidence this new policy is not in compliance with the directives and additions in Management's own handbooks and manuals which mandates supervisors and managers at the local level to ensure ergonomic policies are in place.

The Union further contends there has been a long time past practice of staging flats in tubs at the carrier's cases, and Management chose to rescind it without giving proper notice or negotiating in good faith in an attempt to change it. When all the evidence provided by the Union is objectively considered and carefully examined, it will show Management in the Belle Meade Station proceeded in a reckless manner, ignoring the parties directives from the National Level as well as numerous provisions of the National Agreement and USPS handbooks and manuals when they rescinded ergonomic policies already in place and unilaterally changed this long existing past practice in their effort to implement local policies.

Branch: 4
City: Nashville, TN
Grievant(s): Class Action

PRE-ARBITRATI

If they argue the Eastern Area foundatio

CASE #	**DRT/GTS**	**NT(S)**
C11N-4C-C 14306320	**08 - 333045**	**tion**

Request to interview the person/people that wrote it.

As a result of pre-arbitration discussions, we ve referenced case as follows:

1. The coffins there are currently at the c r placing flats at the carrier's case. The
2. The remaining flats shall be placed in no flats placed on the floor except in tub
3. Each of the carriers on the attached W t) shall receive a lump sum payment of $250.00 minus appropriate taxes.

It is further agreed that the above settlement is reached on a non-precedent basis and is not to be cited or referenced by either party in future cases which may arise (except for purposes of enforcement).

Eric Conklin Date
United States Postal Service
Labor Relations Specialist
Tennessee District

Pete Moss Date
National Business Agent
National Association of Letter Carriers
Region 8

MANAGEMENT'S POSITION:

The Management Formal A representative effectively presented the Facts and Contentions. All of the arguments raised by Management at the Informal and Formal Step A meetings are brought forward to Step B and at Arbitration. The Step B representative would like to add the following:

Management contends Article 3 of the National Agreement gives them the right to direct employees in the performance of their official duties. Management determines the methods, means, and personnel by which said operations are to be conducted. Management cites the National AM Standard Operating Procedure (AMSOP) in defense of their arguments.

Article 3 of the National Agreement reads as follows:

> The employer shall have the exclusive right, subject to the provisions of this agreement and consistent with applicable laws and regulations:
> a. to direct employees of the employer in the performance of official duties;
> B. to hire, promote, transfer, assign, and retain employees in positions within the Postal Service and to suspend, demote, discharge, or take other disciplinary action against such employees;
> **c. to maintain the efficiency of the operations entrusted to it;**
> **d. to determine the methods, means, and personnel by which such operations are to be conducted;**
> e. to prescribe a uniform dress to be worn by letter carriers and other designated employees; and
> f. to take whatever actions may be necessary to carry out its mission in emergency situations, i.e., an unforeseen circumstance or a combination of circumstances which calls for immediate action in a situation which is not expected to be of a recurring nature.

Management notes the following statement from the Step B Union Representative:

> "An ergonomically sound practice had been in place for many years, and was obviously being adhered to in 2013. **Management unilaterally chose to discontinue this policy in 2014** in favor of an AMSOP which the Union contends falls short of the responsibilities the parties have agreed to implement in an effort to lessen the likelihood of repetitive motion injuries."

In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice (JCAM page 5-2). He explained as follows:

> Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is **supported by mutuality**. Some practices are the product, either in their inception or in their application, of a joint understanding; **others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.**

Management contends **there is a mutual agreement regarding placement of flats at the carrier's case; the National AMSOP**, as well as contractual language. The union has failed to provide any signed document in which management at any time agreed to the practice of placing flats in tubs at the carrier's cases.

Management contends the **AMSOP was released on a national basis during Fiscal Year 2005**. The primary intent and purpose of the process was to standardize daily carrier office functions and incorporate an Integrated Operating Plan (IOP) into the management of carrier AM office procedures. One will notice this National Policy does not incorporate language to permit the placement of carrier routed pre-sort bundles into flat tubs at the carrier's cases.

Management submits the following excerpt from the National AMSOP:

3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:
- **ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).** (emphasis added)
- ALL mail with any future day's color code shall be placed **on the floor** on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- **All mail will be placed neatly as close as possible next to the case legs.**
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats

- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- **Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.** (emphasis added)
- ALL labels are to be removed from empty equipment.

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) **or on the floor if no fibredome**. AFSM Standard mail is assumed to be for today's delivery. All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse. (emphasis added)

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) **or on the floor if no fibredome** after the flats have been measured by the supervisor/manager. (emphasis added)

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker. (emphasis added)

Management notes the only categories of mail shown to be placed in flat tubs are ledge loaded and standard flat mail, which is worked on the AFSM and considered preferential mail. **The AMSOP states all presort bundles shall be stacked by the case legs in 2 foot stacks.**

Article 19 of the National Agreement reads in relevant part as follows:

> Those parts of all handbooks, manuals and published regulations of the Postal Service, that directly relate to wages, hours or working conditions, as they apply to employees covered by this Agreement, shall contain nothing that conflicts with this Agreement, and shall be continued in effect except that the Employer shall have the right to make changes that are not inconsistent with this Agreement and that are fair, reasonable, and equitable. This includes, but is not limited to, the Postal Service Manual and the F-21, Timekeeper's Instructions.

Page 19-1 of the JCAM instructs the parties as follows:

> **Handbooks and Manuals.** Article 19 provides that those postal handbook and manual provisions directly relating to wages, hours, or working conditions are enforceable as though they were part of the National Agreement. **Changes to handbook and manual provisions directly relating to wages, hours, or working conditions may be made by management at the national level and may not be inconsistent with the National Agreement. A challenge that such changes are inconsistent with the National Agreement or are not fair, reasonable, or equitable may be made only by the NALC at the national level.** (emphasis added)

Handbook M-39, Management of Delivery Services, reads in relevant part as follows in Section 122, Scheduling Carriers:

> 122 **Scheduling Carriers**
> 122.1 **Establishing Schedules**
> 122.11 Consider the following factors in establishing schedules:
> a. Schedule carriers to report before 6 a.m. only when absolutely necessary.
> b. Fix schedules to coincide with receipt and dispatch of mail. At least 80 percent of the carriers' daily **mail to be cased should be on or at their cases** when they report for work. (emphasis added)

Handbook M-41, City Delivery Carriers Duties and Responsibilities, reads in relevant part as follows in Section 223.2 Magazines, Papers, and Other Flat Mail:

> 223.21 Withdraw magazines, papers, and other flat mail from flat cases and **place neatly in basket** <u>**or on floor at case**</u> when they are not at carrier case upon reporting. Don't obstruct aisle space or create a tripping hazard. (emphasis added)
>
> 223.22 If the flats for your route are received in sacks, remove the flats promptly, and **stack neatly on the floor** or in hampers when provided. Examine sacks after dumping to insure that sacks are empty. Place empty sacks in the designated receptacle after removing sack labels. (emphasis added)

Section 921.13 of the M-41 Handbook reads as follows:

> 921.13 The mail of all classes available to the carrier is (a) that mail distributed and placed on carrier case ledges, in hampers, trays, <u>**or on the floor**</u> beneath the carrier case, and (b) that mail which is in distribution cases up to the cut-off or final withdrawal time prior to departure to serve the last delivery trip of the week of count. (emphasis added)

Management notes several of the carriers at the Belle Meade Station have filed PS Form 1767, Report of Hazard, Unsafe Condition or Practice. Management determined the general consensus was staging flats on the floor is hard on their backs and knees due to the repetitive motion. Management contends Supervisor Beverly Montgomery responded with the same answer on all of the submitted PS Form 1767s as follows:

> "The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inches stacks. Volume in excess of this shall be neatly stacked on the floor beside the case in stacks of no more than 3 ft high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."

Management notes Station Manager Eric Baxter responded on the PS Form 1767 as follows:

> "Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

The Union contends seven letter carriers in the Belle Meade Station submitted PS Form 1767. The Union states "the same generic answer notated on each individual PS Form 1767 reveals the lack of effort and casual attitude Management in the Belle Meade Station has assumed when addressing safety concerns of its employees." Management contends this accusatory statement can be deemed speculation at best, as the Union has no way of determining Management's attitude on this issue. What can be proven is Management's response is within the boundaries of the National AMSOP.

Management submits the following provisions from the EL-814, Postal Employees Guide to Safety, as evidence employees are trained in safe lifting techniques:

> **Section VII: Lifting, Material Handling and Other Equipment**
>
> A. Lifting Guidelines

Lifting is so much a part of our everyday activity that most of us do not think about it, but it's often done incorrectly. The results can include strains, pulled muscles, disc lesions, or painful hernias.

Before lifting anything check the immediate area and route of travel to be sure that no obstruction or hazard can cause a slip, trip, or fall, or a *striking against* accident.

The technique for proper lifting is simple:

- **Assess the load. If it appears to be too heavy or bulky to lift comfortably, get help.**
- Place one foot alongside the object being lifted and one behind. This method gives you greater stability and your rear foot gives you better upward thrust. **Use the *sit-down* position and keep your back in a straight line (though not necessarily perpendicular to the floor). A straight back keeps your spine, back muscles and organs in correct alignment and minimizes the compression of organs that can cause a hernia.**
- Tuck in your chin so your neck and head are in a straight line with your back. That helps keep your spine straight and firm. It is not necessary, however, to force your chin against your chest.
- A palm grip is one of the most important elements of correct lifting. Keep your fingers and hands extended around the object you are going to lift, using your full palm. Fingers alone have very little power; you need the strength of your entire hand.
- **Keep the load you are lifting drawn close against your body; tuck your arms and elbows against your side.**
- When your arms are held away from your body, they lose much of their strength and power. Keeping your arms tucked in also helps keep your body weight centered.
- **Position your body so that your weight is centered over your feet. This provides a more powerful line of thrust and also ensures better balance. Start the lift with a thrust of your rear foot.**
- **Avoid twisting during lifting**; twisting is one of the most common causes of back injury. By simply turning your forward foot out and pointing it in the direction you are moving, you will avoid the greatest danger of injury.
- Do not fight to recover a dropping object or *lost load.* Get out of its way and let it fall.
- **Sudden lifting or releasing of loads can cause stress to the spine and back muscles. Always lift, move, and lower with smooth motions.** (emphasis added)

Management contends all carriers have been trained on safe lifting techniques. Management notes the propensity of clerks to over-fill a flat tub could potentially lead to greater injury because a carrier could misjudge the weight of the tub. Placing bundled mail directly on the floor gives the carrier a better ability to judge the weight they are picking up. Management contends carriers are credited and paid for using safe lifting techniques when their route is inspected. There should be no greater risk of injury simply because mail is not staged in flat tubs; in fact, the risk of injury should be lessened as carriers can more easily assess the weight they are lifting.

Management at the Step B level notes the Formal Step A Union representative stated "the AMSOP is based on management's speculation and is in contradiction to ergonomic safety practices." Management contends all ergonomic programs and agreements cited by the Union reference recommendations and suggestions, none of which give specific Postal Policy as cited in the National AMSOP evidenced by Management. Further,

Management contends the burden of proof is on the Union to demonstrate by a preponderance of the evidence the Employer has violated either the terms of the Collective Bargaining Agreement or the Handbook which is incorporated into the Agreement. The Management Rights provisions of the Collective Bargaining Agreement further provide that management shall have the right to maintain efficiency and determine the methods by which operations shall be conducted.

The following Pre-Arbitration decision explains Management's obligation in notification to the Union when there will be a change or institution of a new work measurement system, work, or time standards as follows:

> **M-01489 Pre-Arbitration June 9, 2003, Q94N-4Q-C-98063238**
> Without prejudice to either party' position on the specific facts of this case, is agreed that it is the Postal Service' responsibility to notify and keep the NALC informed at the national level, pursuant to Article 34 of the National Agreement, during the making, at the national level or by a field unit, "of time or work studies which are to be used as a basis for changing current or instituting new work measurement systems or work or time standards."

Management submits the Arbitration for Case B98N-4N-C00235097 in support of their contentions as follows:

> Award Summary: Management did not violate the National Agreement when it drafted, posted and instructed employees relative to a standard operating procedure. The SOP was not intended to and did not modify any manual or contract and did not change working conditions, **An attempt to standardize practices within an office is not a per se violation of the contract**. Nor did the actions violate the Administrative Support Manual.
>
> ...the intent of the SOP was to assist carriers in understanding their duties. **It contained many excerpts from the manuals but unlike the extensive manuals, placed the descriptions of duties in the order in which they were to be performed by the carriers. It was intended to be a convenient reference and was not intended to modify or contradict the M-39 or M-41. Nor does management believe that the SOP contradicted the requirements of the ASM.**
>
> ...Such a violation would occur only if the SOP actually modified or altered working conditions established by the national agreement, the local MOU or manuals incorporated into the contract by Article 19.
>
> **Attempting to standardize practices within an office is not a violation of the National Agreement. The Union has not established that the implementation of the SOP in Natick actually modified any manual or contractual working condition. Consequently, I find no violation.**

Management contends there have been absolutely no changes to the carriers' work measurement systems, work, or time standards as cited in Article 5 of the National Agreement which reads as follows:

> The Employer will not take any actions affecting wages, hours and other terms and conditions of employment as defined in Section 8(d) of the National Labor Relations Act which violate the terms of this Agreement or are otherwise inconsistent with its obligations under law.

Management notes Section 8(d) of the National Labor Relations Act as follows:

> (d) Obligation to bargain collectively For the purposes of this section, to bargain collectively is the performance of the mutual obligation of the employer and the representative of the employees to meet at reasonable times and confer in good faith with respect to wages, hours, and other terms and conditions of employment, or the negotiation of an agreement or any question arising thereunder, and the execution of a written contract incorporating any agreement reached if requested by either party, but such obligation does not compel either party to agree to a proposal or require the making of a concession: Provided, That where there is in effect a collective-bargaining contract covering employees in an industry affecting commerce, the duty to bargain collectively shall also mean that no party to such contract shall terminate or modify such contract, unless the party desiring such termination or modification.

Management contends the citation of the NLRA Section 8(d) reveals no employee rights violations. Management contends the effectuation of the AMSOP does not alter letter carriers work, work hours, or wages and does not conflict with Article 19 of the National Agreement as there have been no handbook alterations. Management contends the Union has not appropriately met the requisite burden of proof in this contract case and it is for this reason and for all of the reasons cited in the grievance file that Management requests this grievance denied in its entirety.

The Dispute Resolution Team (DRT) has decided to declare an **IMPASSE.** The Step B Team has considered all arguments and evidence in the case file and any of this material may be cited in the event of arbitration. The NALC National Business Agent may appeal this grievance to arbitration within fourteen (14) days after the receipt of this decision.

This grievance file contained the following documents:

(1) PS Form 8190
(2) Issue Statement and Requested Remedy (2 Pages)
(3) Union Contentions (9 Pages)
(4) Table of Contents Unions Informal Step A
(5) Statement From Manuel L. Peralta Jr. (6 Pages)
(6) Job Safety Analysis (Generic) (2 Pages)
(7) Ergonomic Risk Reduction Program Agreement (2 Pages)
(8) (M-01773) (2 Pages)
(9) Ergonomics PowerPoint Presentation (9 Pages)
(10) Alan Moore Memo (3 Pages)
(11) Proposed Changes to EL-809 (6 Pages)
(12) Guidelines for Area/Local Joint Labor-Mgmt Safety & Health Comm. (36 Pages)
(13) Proposed Changes to EL-809 (6 Pages)
(14) Guidelines for Area/Local Joint Labor (22 Pages)
(15) Job Safety Analysis (Generic)
(16) Accident Control Team: Accident Root Causes (8 Pages)
(17) Accident Control Team PowerPoint (8 Pages)
(18) Job Safety Analysis (Generic) (2 Pages)
(19) "Good Ideas" Project (4 Pages)
(20) "Good Ideas" Memo (2 Pages)
(21) 2005 Comprehensive Statement on Postal Operations (2 Pages)
(22) Accident Control Team Draft (2 Pages)

(23) Ergonomic Strategic Partnership (8 Pages)
(24) Ergonomic Risk Reduction Agreement
(25) "Good Ideas" Project (3 Pages)
(26) Request For Information (2 Pages)
(27) Time Limit Extension
(28) Eric Baxter Statement
(29) AMSOP Memo
(30) AMSOP Review Guide (18 Pages)
(31) AMSOP PowerPoint (15 Pages)
(32) Time Limit Extension
(33) Course 17534-05 Facilitator Guide, Article 5 (4 Pages)
(34) Carrier Statements (21 Pages)
(35) Staging Mail Volume (3 Pages)
(36) Request For Information from Eric Baxter
(37) TN District Task Force Meeting (3 Pages)
(38) Photographs (18 Pages)
(39) PS Form 1767 (7 Pages)
(40) Dead Tree Edition Blog: Are USPS Changes Leading to Injuries? (2 Pages)
(41) Email Transmission (4 Pages)
(42) Fax Transmission
(43) Step B Decision C11N-4C-C14118408 (5 Pages)
(44) PS Form 8190
(45) Formal Step A Resolution Form
(46) Step B Decision C11N-4C-C14260088 (5 Pages)
(47) Arbitration Decision C11N-4C-C14123103 (11 Pages)
(48) Time Limit Extension
(49) Management Contentions (2 Pages)
(50) AMSOP Review (18 Pages)
(51) PS Form 1767 (6 Pages)

In reaching the above decision, the DRT carefully reviewed each of the documents and placed the appropriate value to each as it applied to the issue in this grievance.

Betsy Davis
USPS Step B Representative

Paul F Glavin
NALC Step B Representative

DRT Number 077-15

Cc: Pete Moss, NALC Region 8 NBA
Roberta Albright, Eastern Area Labor Relations Manager
Jill Miniard, Eastern Area Labor Relations Representative
Sherry Carr, Management Formal A Representative
Donald S. Onorato, NALC Formal A Representative
David Dillman, District Manager
Charisse Gamble, District Human Resources Manager
Joel Barnes, District Labor Relations Manager

Remedy:

The Union requests that Management cease and desist violating Articles 5 and 14 of the JCAM.

Management be ordered to immediately restore the practice of staging flat mail at city carriers cases in the flat tubs.

Each carrier affected by management's blatant disregard for their safety be compensated $20.00 a day until the practice of staging flats at the carriers cases in flat tubs is restored. The reason that the Union considers this to be a blatant violation is due the the numerous conversations and emails as well as 1767's that has brought this to management's attention yet they still chose to put the carriers in a known unsafe position.

Each person in management be mandated to take a course in ergonomics and its effect on the human body.

Ms. Kim Alley be ordered to take a class on ergonomics and be reprimanded for failing to do her job as District Safety Manager. This ultimately falls at her feet. She refused to stand up and tell those that were responsible that this is putting carriers in a known unsafe position. The minutes of our District safety meeting are included in the case file. She was present and it is obvious that she remained silent when it came time to voice her concern about the carriers being placed in an unsafe position.

ISSUE STATEMENT

Did management violate Articles 5,14,15 and 19 of the National Agreement when they began staging flat mail directly on the ground at carriers cases rather than in flat tubs? If so what is the appropriate remedy? Also did mgt violate 17 & 31 by not providing it's requested documentation

REQUESTED REMEDY

(1)The practice of staging flats in flat tubs at carriers cases be restored immediately. (2)Each carrier at Belle Meade station be compensated $20.00 a day from the incident date until the practice of staging flats in flat tubs at carriers cases has been restored; this is due to the extreme negligence displayed by management in placing carriers in an unsafe situation after National Safety Committee member Corey L. Walton informed them this was an unsafe practice. (3)Management be required to take an ergonomics course to educate them on best practices as encouraged by the National Agreement between Doug Tullino and Billy Young. (4)Tennessee District Safety Manager Kim Alley be required to go through extensive Ergonomics training to educate her fully on her responsibilities as it pertains to keeping carriers safe statewide, or whatever is deemed appropriate

Union Contentions
B4-00729-14
Class Action
Past Practice (Staging Flats)
Belle Meade Station

The issue in this grievance is did manage violate Articles 5, 14, 15, and 19 of the National Agreement when they began staging flat mail directly on the ground at carriers' cases rather than in flat tubs. Also, did management violate Articles 17 and 31 of the National Agreement by not providing requested documentation.

Pages 5-1 and 5-2 of the Joint Contract Administration Manual (JCAM) address the prohibition of unilateral change and the definition of past practice. They read in relevant part as follows:

> **Prohibition on Unilateral Changes.** Article 5 prohibits management taking any unilateral action inconsistent with the terms of the existing agreement or with its obligations under law. Section 8(d) of the National Labor Relations Act prohibits an employer from making unilateral changes in wages, hours or <u>working conditions</u> during the term of a collective bargaining agreement.
>
> **Defining Past Practice**
> In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice:
>
> - First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.
>
> - Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.
>
> - Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct. Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.
>
> - One must consider, too, the underlying circumstance which give a practice its true dimensions. A practice is no broader than the circumstances out of which it has arisen, although its scope can always be enlarged in the day-to-day administration of the agreement. No meaningful

description of a practice can be made without mention of these circumstances. For instance, a work assignment practice which develops on the afternoon and midnight shifts and which is responsive to the peculiar needs for night work cannot be automatically extended to the day shift. The point is that every practice must be carefully related to its origin and purpose.

- Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality. Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.

The union contends management has violated Article 5 of the National Agreement in regard to making unilateral changes in working conditions as well as changing past practices. The grievance file contains statements from city letter carriers at Belle Meade Station (pages U178-198) which state that flats have been staged at the letter carrier cases in flat tubs for as long as they have worked at the Post Office. Some of these carriers have been working for the Post Office for 30-40 years.

Pages U199-200 of the file are a diagram titled Southeast Area Staging Mail Volume. These diagrams clearly show flats being staged at the carriers' cases in flat tubs/bins.

Page U149 of the grievance file addresses the subject of Flat Mail Placement at Carrier Case. It reads in relevant part as follows:

3-11 Flat Mail Placement at Carrier Case

Flats are to be either ledge loaded or placed in Fiberdome. **Significant improvements in city and rural carrier performance as measured by percent to standard can be expected where clerks either ledge load or place in Fiberdomes carrier routed automated flats or presort flats in lieu of the more traditional method of simply stacking automated flat containers at the carrier cases and allowing each carrier to unload the flats and handle the empty flat trays.** Refer to 3-10 of the AMSOP Implementation Guide.

Section 3-10 Staging and Spreading Mail, reads in relevant part as follows:

3-10 Staging and Spreading Mail

Setup, staging and spreading of all mail types must be accomplished so that mail is presented to the carriers in a timely manner to insure delivery is able to maximize efficiency in office and street duties. **All manual letters and flats must be spread by F4 personnel, reducing or minimizing carrier withdrawal time.**

Pulldown is the withdrawal of mail from distribution cases in preparation for spreading the mail to carrier cases. Efficient pulling ensures improving the flow of mail and enhancing distribution. **Carrier withdrawal of letter and flat mail should be eliminated wherever local conditions permit.** The work hours used to pull, withdraw and spread mail is greatly minimized through the use of rolling stock. Therefore, rolling stock should be considered in every office where space permits.

The union contends that management has violated Article 5 of the National Agreement by unilaterally changing the staging methods of mail in the morning without first notifying the union and bargaining in good faith.

Page U118 of the file contains a copy of the signed agreement between the union and management regarding Tools for Injury Reduction ("Good Ideas")—U.S. Postal Service/National Association of Letter Carriers National Joint Safety Task Force. These "good ideas" tools were approved to help reduce injuries and muscular-skeletal disorders. It reads in relevant part as follows:

- Utility/Mail Hooks—plastic rods with a hook to extend the reach of the carrier in loading/unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles.
- **Hamper Inserts—inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail.**
- **Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting).** Sort bins attached to carrier cases are also alternatives for raising flats off the floor.

Page 5-4 of the JCAM reads in relevant part as follows:

> **Changing Past Practices that Implement Separate Conditions of Employment.** If the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice. Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit. If the parties are unable to agree, the union may grieve the change.

The union contends that management is in violation of Article 5 due to the fact that the union was never notified that the signed agreement from April 24, 2008 was going to be considered obsolete and management would now stage flats directly on the floor, putting the carriers at greater risk of injury and muscular/skeletal disorders.

Article 14 of the National Agreement addresses Safety and Health. It reads in relevant part as follows:

> **14.1 Responsibilities**
> It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Union will cooperate with and assist management to live up to this responsibility. The Employer will meet with the Union on a semiannual basis and inform the Union of its automated systems development programs. The Employer also agrees to give appropriate consideration to human factors in the design and development of automated systems. Human factors and ergonomics of new automated systems are a proper subject for discussion at the National Joint Labor-Management Safety Committee.

14.2 Cooperation
The Employer and the Union insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions. Mechanization, vehicles and vehicle equipment, and the work place must be maintained in a safe and sanitary condition, including adequate occupational health and environmental conditions. The Employer shall make available at each installation forms to be used by employees in reporting unsafe and unhealthful conditions. If an employee believes he/she is being required to work under unsafe con - ditions, such employee may:

(a) notify such employee's supervisor who will immediately investigate the condition and take corrective action if necessary;

(b) notify such employee's steward, if available, who may discuss the alleged unsafe condition with such employee's supervisor;

(c) file a grievance at Formal Step A of the grievance procedure within fourteen (14) days of notifying such employee's supervisor if no corrective action is taken during the employee's tour; and/or

(d) make a written report to the Union representative from the local Safety and Health Committee who may discuss the report with such employee's supervisor.

Upon written request of the employee involved in an accident, a copy of the PS Form 1769 (Accident Report) will be provided. Any grievance which has as its subject a safety or health issue directly affecting an employee(s) which is subsequently properly appealed to arbitration in accordance with the provisions of Article 15 may be placed at the head of the appropriate arbitration docket at the request of the Union.

On Page U236 of the grievance file is an email from Belle Meade union steward and NALC district safety co-chair Corey Walton to Bruce Goetz, Eastern Area Safety Manager. Mr. Walton asked Mr. Goetz about the mail being placed on the floor, and what the Eastern area's position was on the subject. Mr. Goetz replied as follows:

> Since this is being grieved I am cautious to comment. My opinion doesn't speak for the entire Postal Service and depending on what level the grievance enters I will not provide my opinion.

On Pages U233-235 of the grievance file are email exchanges between Mr. Walton and then-Manager of Safety Pat King. Mr. Walton repeatedly tried to get the ergonomic recommendations in place in the Tennessee district, but did not receive any meaningful cooperation from Ms. King.

Pages U203-204 are copies of the minutes of the district safety meeting conducted on September 30, 2014. Mr. Walton addressed the subject of mail being staged directly on the floor in contradiction to ergonomic policies. Charisse Gamble, Manager of Human Resources, replied that flat coffins were used in high volume offices. Mr. Walton responded that in Belle Meade, a high volume office, that sometimes there is 10-11 feet of flats that will not fit in the flat coffins. NALC Branch 4 President Dave Clark then addressed the subject of flat tubs in the offices. Ms. Gamble replied that flat tubs will not be used to stage bulk mail in the stations and associate offices, that bulk mail will be

staged directly on the floor at the carriers' cases. The union contends that this repeated insistence of staging mail directly on the floor is in violation of Article 14 due to the unsafe requirement of carriers to pick things directly off the floor repeatedly in order to fulfill their morning requirements.

Page U201 is a copy of the Tennessee District Staff Spot Audit performed at Belle Meade Station on 9/14/14 by John D. Crockett. Next to Question 6 (Are carriers cases clean and clear of empty equipment?) Mr. Crockett wrote the following in the comments section:

> At least 2 carriers requested the use of flat tubs at case to prevent bending down. Unnecessary—flat coffins installed with more forthcoming.

Pages U206-223 of the grievance file contains photographs showing that most of the carriers' flat coffins are full, and mail is still being stacked directly on the floor. The mail is not always neatly stacked, and sometimes is falling onto the floor. The union contends that this is presenting a safety hazard to the carriers and anyone else who may walk by at the wrong time.

Pages U224-230 contain copies of PS Forms 1767 Report of Hazard, Unsafe Condition or Practice. The carriers who filled out these forms refer to the awkward bending and twisting required to pick up flats directly from the floor, and for the need to have the mail properly elevated in the ergonomically correct position. Each 1767 has the same, generic response from the immediate supervisor and the approving official. The immediate supervisor, Beverly Montgomery, wrote on each 1767:

> The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded with 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3 feet high. When the ledge is empty, carriers will replenish the ledge with stacks from the floor, removing all plastic shrink wrap at that time. Refresher training will be given to all employees on proper lifting techniques.

The approving official, then-Station Manager Eric Baxter, wrote on each 1767:

> Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times.

The union contends that management has failed to take any action to improve the safety of carriers in regard to keeping mail from becoming a hazard on the floor, and is unwilling to use the ergonomic tools suggested in the April 2008 agreement in order to provide the carriers with a safe work environment.

Page U202 of the file contains a letter dated September 17, 2014 from then-Station Manager Eric Baxter to union steward Corey Walton. It reads in relevant part as follows:

> Per your request for information extension, I am requesting the interview questions that you will be asking the author of the Eastern Area delivery foundation.

Mr. Walton's reply is also on page U202, which reads as follows:

> As per my conversation with Sandy Quick [Manager of Customer Service Operations; conversation took place September 16, 2014], I need the memo as stated on the 1767's, the Eastern Area Delivery Foundation. I will base my questions off of this memo. I will not be furnishing any questions to anyone in advance.

The union contends that management was less than truthful about an Eastern Area Delivery Foundation being in existence. The union also contends that management instead provided the union with an AMSOP from operations support. The union further contends that management was more concerned about getting Mr. Walton's questions and coming up with rebuttals rather than providing a safe work environment to the carriers as required by Article 14 of the National Agreement.

Pages U1-131 of the grievance file contain the statement and contentions of Manuel L. Peralta, Jr., the Director of Safety and Health for the National Association of Letter Carriers. Page U2 references the Mail Elevation Units previously mentioned. Also mentioned on pages U2-3:

> In addition to the signed national level agreement, the National Joint Labor-Management Safety Committee prepared what we commonly identify as a Job Safety Analysis (JSA) as required by OSHA as found in 29 CFR Section 1910.132(d)(2).
>
> In the section titled "Sequence of Basic Steps" the national parties identified two work functions:
>
> 1. **Place mail on an elevated work surface**
> 2. **Removing mail from an elevated surface**
>
> In the section titled "Potential Hazards and Effects" the national parties identified the following:
>
> **1.1 Hazard: Placing load onto a low level surface**
> **Effect: The lifting hazards are repeated for the next lifter. Back, shoulder, and knee strain while lowering the load to the floor.**
>
> **1.2 Hazard: Mail falling to the floor**
> **Effect: Struck by, or slip/trip/falling hazard**
>
> In the section titled "Safe Work Practices" the national parties identified the following:.
>
> **1.1 Invert plastic milk crates or tubs on the floor (or other appropriate alternatives) to elevate the mail and reduce repetitive bending/reaching.**
>
> **1.2 Position mail so that it rests securely on the platform.**
>
> **22.1 Use safe lifting techniques.**

Referenced on Pages U3-4 are the provisions in the USPS Employee and Labor Relations Manual (ELM) that refer to ergonomics:

> **811.22 Vision Statement**
>
> The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the

OSHA Voluntary Protections Programs (VPP). **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction Program and joint labor-management safety and health committees.**

833 Safety and Health in Design, Procurement, and Construction

833.1 Standards, Ergonomics, and Engineering

OSHA and applicable consensus safety and health standards, **ergonomic considerations**, and sound safety and fire protection engineering techniques **must be used** to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment**, equipment, tools, supplies used, and the material on which work is performed. Purchasing, **delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.** Managers responsible for purchasing, design, and construction are accountable for compliance with OSHA standards and applicable fire protection and building codes.

The union contends that management is in violation of Article 19 via Sections 811 and 833 with their failure to follow ergonomically sound recommendations via staging flat mail on the floor as opposed to staging flat mail in tubs/buckets as had been done previously.

Page U139 of the grievance file contains a letter from then-Station Manager Eric Baxter to union steward Corey Walton that was presented at the Informal Step A meeting. It reads in relevant part as follows:

> The documentation dated April 24, 2008 between Tuilino [sic] and Young isn't an agreement. It's a "good ideas" suggestions that has nothing to do with flat tubs but it's talking about hampers.

Page U11 clearly states the following:

> **Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting).** Sort bins attached to carrier cases are also alternatives for raising flats off the floor.

The union contends that management is wrong in its insistence that the documentation has nothing to do with flat tubs.

The grievance file also contains an article titled "Are USPS Changes Leading to More Work-Related Injuries?" (pages U231-232). The union contends that if management was truly concerned about cutting its Workers' Compensation costs, it would follow through 100% with all of the ergonomic recommendations and good ideas that have been suggested, discussed, and implemented. However, the union contends management would rather try to cut expenses at the risk of an increase in work-related injuries. Such logic is what is commonly referred to as "penny wise and pound foolish."

Pages 17-3 and 17-4 of the JCAM read in relevant part as follows:

> **Steward Rights.** Article 17.3 & 17.4 establish several steward rights:

• The right to investigate and adjust grievances and problems that may become grievances;

• The right to paid time to conduct those activities;

• The right to obtain management information;

• Superseniority concerning being involuntarily transferred;

• An employee's right to steward representation during an Inspection Service interrogation.

Steward Rights—Activities Included. A steward may conduct a broad range of activities related to the investigation and adjustment of grievances and of problems that may become grievances. These activities include the right to review relevant documents, files and records, as well as interviewing a potential grievant, supervisors and witnesses. Specific settlements and arbitration decisions have established that a steward has the right to do (among other things) the following:

• Complete grievance forms and write appeals on the clock (see below).

• Interview witnesses, including postal patrons who are off postal premises (National Arbitrator Aaron, N8-NA-0219, November 10, 1980, C-03219; Step 4, H1N-3U-C 13115, March 4, 1983, M-01001; Step 4, H8N-4J-C 22660, May 15, 1981, M-00164);

• Interview supervisors (Step 4, H7N-3Q-C 31599, May 20, 1991, M-00988);

• Interview postal inspectors (Management Letter, N8-N-0224, March 10, 1981, M-00225);

• Review relevant documents (Step 4, H4N-3W-C 27743, May 1, 1987, M-00837);

• Review an employee's Official Personnel Folder when relevant (Step 4, NC-E 2263, August 18, 1976, M-00104)

Page 31-2 of the JCAM reads in relevant part as follows:

Information. Article 31.3 provides that the Postal Service will make available to the union all relevant information necessary for collective bargaining or the enforcement, administration or interpretation of the Agreement, including information necessary to determine whether to file or to continue the processing of a grievance. It also recognizes the union's legal right to employer information under the National Labor Relations Act. Examples of the types of information covered by this pro vision include:

• attendance records
• payroll records
• documents in an employee's official personnel file
• internal USPS instructions and memorandums
• disciplinary records
• route inspection records

- patron complaints
- handbooks and manuals
- photographs
- reports and studies
- seniority lists
- overtime desired and work assignment lists
- bidding records
- wage and salary records
- training manuals
- Postal Inspection Service Investigative Memoranda (IM)
- Office of Inspector General Report of Investigation (ROI)

To obtain employer information the union need only give a reasonable description of what it needs and make a reasonable claim that the information is needed to enforce or administer the contract. The union must have a reason for seeking the information—it cannot conduct a "fishing expedition" into Postal Service records. Settlements and arbitration awards have addressed the union's entitlement to information in certain specific areas.

The union contends that management is in violation of Articles 17 and 31 due to their failure to provide the requested information. Pages U136-137 of the grievance file contain the union's requests for information, specifically the Eastern Area Delivery Foundation. Management failed to provide this, but instead provided an AMSOP. The AMSOP is based on management speculation and is in contradiction to ergonomic safety practices.

UNITED STATES
POSTAL SERVICE

MANAGEMENT'S CONTENTIONS
ARTICLE 8.5.g GRIEVANCE
BELLE MEADE
FOR ALLEGED VIOLATIONS ON STAGING FLATS
LOCAL UNION #B4-00729-14
GATS #14306320

Union contentions:
Did management violate Articles 5,14,15,& 19 of the National Agreement when they began staging flat mail directly on the ground at carriers cases rather than in flat tubs? Also did management violate 17 & 31 by not providing requested information?

Management has provided local NALC a copy of the AMSOP.

Section 3-6 Mail Spreading SOP
3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:
- ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).
- ALL mail with any future day's color code shall be placed on the floor on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- All mail will be placed neatly as close as possible next to the case legs.
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats
- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- *Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.*
- *ALL labels are to be removed from empty equipment.*

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) or on the floor if no fibredome. AFSM Standard mail is assumed to be for today's delivery. *All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse.*

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) or on the floor if no fibredome after the flats have been measured by the supervisor/manager.

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker.

Several of the carriers at Belle Meade filed a 1767, Report of Hazard, Unsafe Condition or Practice.
The general concensus was that staging flats on the floor, loose, not in flat tubs is hard on their backs, knees, and excessive repetitive motion.

The supervisor, Beverly Montgomery, responded with the same answer on all 1767,s.
"The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inches stacks. Volume in excess of this shall be neatly stacked on the floor beside the case in stacks of no more than 3 ft high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."

The manager, Eric Baxter, responded to all the same also:
" Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

Management is abiding by the Eastern Area and the AMSOP.

Attachments:
AMSOP
1767's

INTRODUCTION

The AM SOP Review is to be utilized in all EAS-22 and higher level offices including all subordinate facilities and all Flats Sequencing (FSS) Sites. The unit that has successfully pass the AM SOP Review has achieved a well defined high level of efficiency determined by accomplishments in implementing standardized operating procedures and in successfully demonstrating performance at or above targeted performance factors in Customer Services and Delivery Operations. The achievement for this status requires a high level of commitment and cooperation between Mail Processing, In-Plant Support, Transportation, District Operations Programs Support, and local management.

Mail Processing and Transportation must provide a high level of support to the AM SOP Office documented by an established, comprehensive Integrated Operating Plan (IOP) which includes components for tracking, communication, feed back and problem resolution (*While it is recognized that the resources may not be available to provide this level of support for all similar sized offices, this level of support should be pursued in each AM SOP Office*).

This AM SOP Review Implementation Guide outlines the general parameters and targets which define:

- Stabilizing mail flows
- Increase use of automation
- Designing effective and manageable unit work floors and work flow
- Efficient distribution equipment, carrier equipment and equipment configuration
- Establishing Standard Operating Procedures (SOPs) for supervisor, carrier and clerk processes
- Using data and tools in managing customer service and delivery operations

The *following pages* contain specific targets by operation as well as guidance on how to achieve the targets. The *Guide* also references the Standard Operating Procedures (SOPs) which support the overall AM SOP effort. The ultimate goal of the AM SOP concept is to spread standardized methods and processes to all delivery units, creating exceptional external and internal service while promoting cost efficiency and supporting corporate 24 hour clock targets.

1 AUTOMATION

1-1 DPS Achievement - An AM SOP Office is a unit that has achieved a DPS percent of 85% or higher consistently over the most recent 4-week period. Implementing the following processes will ensure maximum DPS volume. All processes should be running simultaneously.

Partner with the Plant - At the top of the list to boost any Customer Service/District's DPS percentage would be to form a partnership with the servicing Plants. Plant management and craft should be as knowledgeable about DPS percentage goals as Customer Service management and craft. Working with the Plant to insure dedication to running every piece of automation letter mail on the DPS programs, maximizing DPS machine usage, maintaining current DPS programs and maintaining high machine performance levels is critical. Each District should create a dedicated DPS Team incorporating Customer Service and Plant personnel at all levels to get the maximum mileage from all DPS enhancing activities.

Edit Book Review (Red Book) - The first step to increase DPS percentage is a complete review of all City and Rural Edit books. Reasons can be due to a number of factors causing change; such as growth, change in delivery mode, route adjustments, 911 addressing, and others, a carrier by carrier review is required. District Address Management Systems (AMS) should be consulted to assist with this. Carriers may have been focusing on validating addresses alone while accurate information on mode of delivery is also critical. Therefore, in addition to confirming line of travel, address, street name/directional/suffix, secondary address, and 1621 code; carrier knowledge of multiple delivery point addresses and the corresponding letter mail volume should be annotated. This insight can aid in deciding which multiple delivery points need to be physically audited under the "Station Input Review".

Counting Manual Letter Mail - Often over looked, accurate counting of manual letter volume will generate a true picture of DPS percentage. It is ultimately the responsibility of the supervisor to insure manual letter volume is correctly input into DOIS. Manual letter mail must be compressed evenly and measured with a ruler always. Care must be taken not to duplicate the counting of automation holdouts and to insure all NLM is handled correctly. Districts should re-distribute instructions for counting mail at least once a year as a refresher course. Volume Recording for F4 is outlined in Management Instruction, PO-610-2002-3 and F2B is outlined in Management Instruction, PO-610-2000-1.

Station Input Editor (SIE) Review - Whether the site is a CSBCS site or a Delivery Bar Code Sorter (DBCS) site will determine the access and control of Station Input Holdouts. In either situation, it is important to remember only Multiple Delivery Point (MDP) Holdouts are excluded from DPS volume in City delivery. All holdouts are excluded from Rural DPS volume. All holdouts (Change of Address (COA), Temporary Non-Delivery (TND), Non-Delivery Day (NDD), Window Call (WC), and Multiple Delivery Point should be reviewed. In addition to validating holdouts impacting DPS percentage for City delivery, take advantage of increasing carrier efficiency for both City and Rural Delivery. When Station Input is maintained consistently by the guidelines, there is no adverse impact during National Rural count.

Special attention should be given to MDP holdouts. Based on review of the MDP holdout report and carrier input, a physical street audit may be needed. All MDP holdouts for street and high rise defaults should be eliminated where feasible. The deciding test is whether a carrier can affect delivery of non-sequenced secondary addressed mail (i.e. mail coded with the street or high rise default versus the high rise exact) on the street in a reasonably efficient manner. Other holdouts should be reviewed for compliance to guidelines as follows:

- COA – tagged for no longer than 30 days
- TND – tagged for time indicated on the order
- NDD – tagged for business closed day only
- WC – tagged for actual Caller Service customer only

Reject Mail and Unassigned Bin Review - All DPS leakage should be reviewed regardless of source. Reviewing Reject and Unassigned bin trays can be tedious and time consuming, but promotes increased DPS, as well as, customer satisfaction. The good news is dedication and follow through brings results and expedites future work in this area. The first step is to perform a lookup to insure the address on the mail piece is a valid address and in the sort programs. After validation of the mail piece address and analysis of the barcode, mail pieces should be copied and forwarded to the appropriate person for resolution. Other functional areas such as In Plant Support, AMS, Mail Piece Design Analysts, Business Mail Entry, DPS Coordinators and any dedicated DPS Teams are the support behind the local office initiative to identify this leakage. There may be no resolution to some individual mail pieces. It's difficult to impact poor addressing by an individual customer. Mail pieces put in the system by businesses and major mailers will account for most of the successes. Also, it probably will not be possible to review every piece of mail in every reject and unassigned bin tray. However, it is important to dedicate resources to this process daily. Each successful resolution increases the knowledge of the person doing the audit, expedites the next review and increases DPS. The following is a link to an excellent Address Look-up Tool:

Reference:
http//:zip4.usps.com/zip4/welcome.jsp

Electronic Mail Improvement Reporting (eMIR) - When irregularities are found in mailings past the point of acceptance, they should be reported through the eMIR system. Some of these irregularities may be causing DPS leakage. In any event, all irregularities should be reported through the online system. Local mailings can be resolved locally, but should still be input into the eMIR system to provide resolution tracking. National and Premier accounts are handled at the Headquarters level through the Business Service Network once they are input in eMIR.

Backflow of DPS Candidate Mail - It is important to have a consistent backflow of DPS candidate mail to the serving Processing and Distribution Center (P&DC), whether the unit DPS is processed on a DBCS or CSBCS. All incoming dispatch should be surveyed by a Supervisor for disposition. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS, while meeting our service commitments. Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

Carrier Mode of Delivery - It's important to maintain accurate delivery mode (1621 code) on City and Rural edit sheets. DPS sort programs are built on the AMS database. When new deliveries are added or old deliveries are updated with new 1621 codes, AMS should receive the information as soon as possible. Obviously, you can't sort mail to a new address that is not in the sort program, but change of delivery mode updates can also impact DPS significantly. For example, what if you have a 9 story high rise building with heavy mail businesses that changes from door to door delivery to some type of cluster box delivery? What used to be held out of DPS, due to being door to door, can now be included in DPS.

Carrier Route Schemes - Correct, complete street name assignments should be current at all times. In DPS, N Main St is not the same as Main St N. Typically, streets with a directional, with unusual spellings, with initials in the name, with name/number range changes, and numbered streets are candidates for incorrect application on mail pieces. AMS allowed alias street names are one way to overcome poor customer addressing. Up to date scheme books should be available in the Delivery Unit at all times.

Missent, Missort, Missequence (MMM) - Generally, Missent pieces are bad barcodes, Missort pieces are machine errors, and Missequenced pieces are a machine problem unless the same mail piece is being missequenced constantly. An AM SOP Office must have a dedicated 3M case for carriers to deposit DPS errors returned from the street. A daily communications process with the plant to share problems found should be part of the IOP process addressed in Chapter 2

of this guide. A supervisor or designated knowledgeable craft employee will review this mail on a daily basis.

Electronic Un-coded Address Reporting System (eUARS) - eUARS are generated when a customer submits a change of address with a new address that cannot be matched to a ZIP+4 in the Address Management System (AMS) database and when un-coded Address Element Corrections are created through Memphis. Postmasters and Customer Service Supervisors must check the eUARS site regularly to edit/correct elements of the submitted address to allow matching to the AMS database. Corrections may be as simple as correcting a directional or may initiate adding a new street to an edit book. Clearing eUARS guarantees automation compatible forwarding addresses and customer address lists. District tracking of eUARS not cleared in a timely manner insures compliance.

Delivery Sortation Management Automation Research Tool (DSmart) - DSmart is a new online Intelligent Mail and Address Quality (IMAQ) tool implemented this fiscal year identifying DPS leakage based on the number of "hits" of individual barcodes on live mail falling out of DPS from DBCS and CSBCS final pass. Each eleven digit barcodes not falling in DPS totals and rolls to the appropriate report. Reports may be pulled by 5-digit Zip Code, desired time frame, and threshold volume and include the carrier route id for ease of use. Types of reports are as follows: 1) *Potential Missing Delivery Points, High Rise Analysis*, 2) *Potential Street to High Rise Coding Opportunity, 3) New DPF High Rise Zip +4*, 4) *No/Low Volume*, 5) *Business Names*. Each report is an aid to improving DPS percentage. Some of the reports can be easily resolved and others require research and/or carrier input. Training and reports are available online at:

Reference:

http://dsmart.usps.gov/. Your login for DSmart is your ACE login.

All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

1-2 Backflow of Automation Compatible Mail - It is important to have a consistent backflow of automation compatible mail to the serving Processing and Distribution Center (P&DC), whether the unit's DPS is processed on a DBCS or CSBCS and the unit's flats are processed on AFSM or FSS equipment. All incoming dispatch should be surveyed by a Supervisor for identification and separation of automation compatible mail before it is sorted in manual distribution or reaches carrier cases. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS and all 5-digit automation compatible flats carrier-routed on the AFSM or in FSS, while meeting our service commitments. The placard used to return the mail to the plant should indicate the color code that was on the mail when it arrived in the delivery unit.

Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

1-3 Mail History Tracking Reporting System - This report is to be run by the supervisor/manager every day no later than 30 minutes after first available and the errors are to be shared with the appropriate carriers. Carriers then must pull the DPS errors out of their DPS trays and either case the mail or return the mail to the hot case for distribution to the correct route.

The report can be pulled by typing "MHTS" on the blue page or at the following website link: http://mhts/mhts/index.html. If you have problems with the website or report call (703) 207-7297 or send an e-mail to: mhtshelp@nortelgov.com

2 INTEGRATED OPERATING PLAN (IOP)

2-1 S999 Mail - All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. See 2-5 of the Implementation Guide.

2-2 IOP - The IOP is a contract between the mail processing plant(s) and the delivery unit. A signed copy must be on file in the Delivery Unit. The contract covers the mail arrival from the plant and identifies the product of mail agreed upon for each individual trip. The primary purpose of having an IOP is to stabilize mail flows. Each District must have an IOP Coordinator who serves as a valuable resource in setting up mail arrival contracts between the delivery unit and the plant. The mail product agreed upon for each dispatch from the plant to the delivery unit must be conducive to the unit's mail flow needs. The current dispatch schedule must be posted in a prominent place on the receiving dock. IOP is an integral part of the F4 Business Plan, On-Site F4 Reviews, AM SOP, and 24 hour clock goals. The mail arrival profile is critical in establishing appropriate staffing and reporting times.

2-3 DOIS Recording of Arrival Times and volumes - The IOP contract must be current and must be adhered to by all parties. DOIS version 4.3 or higher provides the necessary capability to track and monitor compliance with the IOP. The portion of the IOP contract showing truck schedules and the product of mail that should be on each truck must be posted. The IOP contract information showing truck arrival times and percent of AM Total Mail on each trip must be entered into the DOIS "Maintain Dispatch Information" screen. The trip that has DPS, Automated Carrier Route Flats, and Automated Carrier Route Letters must also be noted in this screen. The unit must track the amount of volume received by trip and record the actual time of arrival.

Trip information for delivery unit operations must be entered in the DOIS "Capture Daily Dispatch" Screen. For each trip enter:

- The actual arrival time of the trip
- Confirm arrival of DPS
- Confirm arrival of Automated Carrier Route Letters
- Confirm arrival of Automated Carrier Route Flats
- Volume of working letters, flats, and parcels
- Volume of automated volume received.

Trip information for all carrier routed mail received from the plant that bypasses F4 processing must be entered into DOIS by trip including the arrival time. This can be entered on the DOIS "Capture Mail Volumes – Manual" screen or on the "Capture Mail Volumes – DCD" screen. The volume taken to carrier routes that is withdrawn should be entered as "Withdraw" in DOIS. DPS and Automated Letter and Flat volumes will automatically be attributed to the trip assigned in the "Maintain Dispatch Information" screen.

2-4 Communication Channel - If variances between the IOP and the actual performance exist, the responsible management partners must provide the necessary feedback and take the necessary actions to address these variances with the partners. The DOIS "Unit Distribution Volume Feedback Report" identifies late trips, and variances from the IOP in the amount of working / automated mail received on each trip. Use this report as the basis for following up with the plant to address these variances. The DOIS "Unit Volume Feedback Report" identifies routes that do not receive 80% of caseable mail by the carrier's start time.

2-5 Mail Arrival - The IOP must be based on the valid requirements for mail arrival at each delivery unit. Some valid requirements include:

- Transportation from the plant to the delivery unit on time 95% or better
- Containers properly labeled and placarded
- Separation of First and Standard (A) flats to the maximum extent possible

- Mail mix (Unit Distribution %) on the Pre-DOV/DOV as negotiated by the Lead MDO and the Postmaster/Station Manager
- Mail flow i.e. arrival time of DPS, arrival of auto letters and arrival of auto flats
- DPS Rejects on top of the appropriate container
- Deviations from the contract will be preceded by a phone call from the Plant

2-6 DPS Processing - Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

2-7 Automated Flat Separations - The IOP must include a commitment by mail processing to make a minimum of 4 distinct rolling stock container separations for automation carrier route flats. Automation flats are spread by Function 4 to the carrier cases and either ledge loaded or placed in carrier Fibredomes prior to the carrier reporting times. In order to minimize re-handling of carrier route flat tubs by Function 4 and to allow the clerk(s) to complete the spreading in a timely manner, the Function 1 Mail Processing Flat staging and dispatch operations must be optimized to efficiently support this Function 4 task.

The following steps are recommended in order to implement this process:

- A designee from In-Plant Support (typically an Industrial Engineer) works with local management of the AM SOP Office to identify the optimum separations for each container of flat trays based on the physical layout of the carrier cases and the existing automation sort plan.
- In-Plant Support revises the automation sort plan for implementation of the desired separations in a manner that simplifies instructions for the machine operators. For example, to make 4 separations for a unit that has both city and rural delivery and the carrier cases are physically aligned in numerical sequence, consider placing the low numbered city routes and low numbered rural routes on one side of the machine and the high numbered routes on the opposite side. Two containers would be placed at the end of each side of the machine, one for city and one for rural. PO Box sections and Firm Callers could be placed on opposite sides to provide two additional separations where warranted.
- In-Plant Support develops an SOP (sample attached) and proposed container placards and shares it with the AM SOP Office local management for review and concurrence. The AM SOP Office develops an SOP for spreading automation carrier route flats (sample attached) and shares it with In-Plant Support for review and concurrence. The AM SOP Office, SOP for spreading automation carrier route flats should include procedures for spreading and stacking CR Presort bundles at the unit, also.
- In-Plant Support should train the machine operators and appropriate SDO(s) and MDO(s) on the revised dispatch process and implement the revised sort plan and dispatch procedures. The AM SOP Office should train the Function 4 clerks and implement the revised automation carrier route flat spreading SOP.
- Revise the IOP to include the agreed upon separations and dispatch particulars for automation carrier route flats.
- Because of business or other operational issues, this question could be answered N/A.

3 CLERK OPERATIONS - FUNCTION 4

3.1 AM Accountable - This operation has a significant direct impact on the carrier operation through the sorting and assigning accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. Accountable items must be available for the carriers in a timely manner so as not to delay the carrier's departure to the street. As little carrier time as possible should be used in this operation, so it is highly recommended that a mobile accountable cart operation be used. The accountable

cart must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details

3-2 PM Accountable - This operation has a significant direct impact on the carrier operation through the clearing of accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. When the carriers return from the street, an efficient clearance process that allows for clearance as soon as the carrier returns to the office with minimal or no waiting time is desired. The accountable cage must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details.

3-3 Distribution Cut Off Times and Distribution Expectations - Mail up times should be established and posted in each manual operation, including PO Box mail and CSBCS operations, reflecting finalization of mail in the order of flats, letters and then parcels/SPRs. Up times must effectively support the earliest carrier leave time and be supported by the IOP. Supervisors should make accurate assessment of all workloads and appropriate assignments. At the final incoming dispatch, Supervisors should re-evaluate assignments to insure finalizations of all mail types to meet Delivery needs. Actual work hour variance should be calculated daily and used to evaluate operations and make management decisions.

An efficient LDC 43 operation is critical for an AM SOP Office. All mail types (letters, flats, parcels/SPRs) must be sorted at a rate equal to or greater than the distribution expectations published in Automation Workforce Planning System (AWPS) and as re-stated in the Function Four Business Plan. All unit up times and distribution expectations must be communicated with all F4 personnel.

Distribution Expectations

Letter Mail Distribution

Separations	Foot Per Hour	Pieces
00-20	9.5	2157
21-35	9	2043
36-49	8.5	1930
50-63	7.75	1759
64-77	7	1589
78-84	6.26	1419
85-999	5.5	1249

Flat Mail Distribution

Separations	Foot Per Hour	Pieces
0-20	11.75	1,351
21-35	11.25	1,294
36-49	10.5	1,208
50-63	9.5	1,093
64-77	8.75	1,006
78-84	7.75	892
85-999	6.75	776

National Container Conversion Rate for Containers

	Full	3/4	½	¼
#1 Sack	8.79	6.6	4.4	2.2
U-cart	12.31	9.23	6.2	3.1
Gurney (1033)	15.27	11.4	7.6	3.8
Hamper (1046)	39.7	29.8	20.0	10.0
GPMC/APC/ERMC	102	76.5	51.0	25.5
Over the Road (OTR)/BMC	261	195.8	130.5	65.2
Wire Container	118	88.5	59.0	29.5
Extended hamper	65	48.75	32.5	16.2
WestPak/Gaylord	261	195.8	130.5	65.2
Outside Pieces	Actual count			
Destination Delivery Unit (DDU)	Actual count from PS Form 8125, Plant-Verified Drop Shipment (PVDS) Verification and Clearance			

NOTE: Parcel container conversions currently include SPRs. Do not initiate a second handling to achieve a separate piece count for SPRs. This applies to Function 4 parcel post volume recording, not Function 2.

3-4 Empty Equipment - The workroom floor must be clear from excess, empty equipment. As clerks spread mail, empty equipment must be removed and placed in containers for return to the plant in a timely manner. All labels must be removed from mail transport equipment, whether, trays, tubs or rolling stock when the equipment is emptied.

The disposal of empty equipment returned from the street is the responsibility of the carrier. Many carriers reuse equipment daily such as hard plastic trays. These are typically retained overnight at the carrier case. Excess letter carrier equipment to be returned usually consists of DPS letter trays. Empty equipment containers must be pre-positioned in the carrier's line of travel for the carrier to deposit excess letter trays and other commonly used equipment upon their return from the street.

References:

POM Section 58 – "Mail Transport Equipment Handling Policy";
Website link: http://blue.usps.gov/delret/L4CustServSupp_Function4.htm.

3-5 National Color Code Policy - Supervisors must train all F4 personnel on the procedures of the National Color Coding Policy and ensure compliance for working manual F4 volume and spreading F2 volume. Obtain a copy of the National Color Code Policy at the following website: http://blue.usps.gov/opsplanning/colorcodeqa.htm and refer to Postal Operations Manual 458.34 at the following website: http://blue.usps.gov/cpim/ftp/manuals/pom/html/c4_029.htm.

3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:

- ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).
- ALL mail with any future day's color code shall be placed on the floor on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- All mail will be placed neatly as close as possible next to the case legs.
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats

- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.
- ALL labels are to be removed from empty equipment.

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) or on the floor if no fibredome. AFSM Standard mail is assumed to be for today's delivery. All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse.

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) or on the floor if no fibredome after the flats have been measured by the supervisor/manager.

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker.

3-7 Function Four Volume Recording - Daily volume and productivity reporting must be established and displayed. Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009, accessible at the following website:
http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

F4 Volume Recording

- Accurate volume recording is essential.
- The designated employee must measure with a ruler, tape measure or yardstick.
- Compress mail in a consistent manner.
- Record linearly and round to nearest quarter foot.
- Volumes are entered onto the preferred form (PS Form 3930).
- Conversions to pieces must utilize current pieces per foot conversion rate.

F4 Volume Not Recorded

- Carrier-routed volumes generated from automation operations.
- Direct bundles and trays/tubs
- Mail being riffled to check for errors
- Accountable items

Presort Letters And S999 Mail

- When possible presort letters should be back flowed to the DPS operation.
- Spread non-machineable presort and S999 mail directly to the carrier case
- Do not record volumes for S999 mail.

Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009. The Management Instruction (MI), PO-610-2009-1, Function 4 Standardized Customer Service Workload Reporting System contains the national policies and procedures for recording and reporting Function Four workload. To obtain a copy of the Management Instruction go to the following website:

http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

3-8 - Reserved

3-9 - Reserved

3-10 Staging and Spreading Mail - Setup, staging and spreading of all mail types must be accomplished so that mail is presented to the carriers in a timely manner to insure delivery is able to maximize efficiency in office and street duties. All manual letters and flats must be spread by F4 personnel, reducing or minimizing carrier withdrawal time

Pulldown is the withdrawal of mail from distribution cases in preparation for spreading the mail to carrier cases. Efficient pulling ensures improving the flow of mail and enhancing distribution. Carrier withdrawal of letter and flat mail should be eliminated wherever local conditions permit. The work hours used to pull, withdraw and spread mail is greatly minimized through the use of rolling stock. Therefore, rolling stock should be considered in every office where space permits.

3-11 Flat Mail placement at Carrier case - Flats are to be either ledge loaded or placed in Fiberdome. Significant improvements in city and rural carrier performance as measured by percent to standard can be expected where clerks either ledge load or place in Fiberdomes carrier routed automated flats or presort flats in lieu of the more traditional method of simply stacking automated flat containers at the carrier cases and allowing each carrier to unload the flats and handle the empty flat trays. Refer to 3-10 of the AM SOP Implementation Guide.

Manual flats are to be measured by the supervisor prior to the clerk spreading the flats to the carrier's case.

NLM must be stacked in such a way to facilitate accurate measurement by the supervisor while ensuring the separation of NLM and linear measured mail. All mail must be arranged to allow ease of identity of current days' mail while maintaining correct color coding. Refer to 3-4, 3-5, and 3-10 of the AM SOP Implementation Guide.

3-12 Mail On Time To Carriers - The timely arrival and subsequent spreading of flats at the carriers' case is crucial to the success of an AM SOP Office. A key target is to have 80% of all caseable mail available at the carrier cases and all associated empty equipment including any flat tubs or letter trays removed from carrier casing areas prior to scheduled carrier reporting times.

Refer to Section 2 IOP of the AM SOP Implementation Guide for resolving mail arrival concerns. Refer to 3-3 of the AM SOP Implementation Guide for distribution expectations and posted cut off times within customer service operations.

Carrier start times must coincide with 80% of caseable mail being available at the carriers' cases.

3-13 Full Coverage Mailings (Walk Sequence) - Walk sequenced mailings should be isolated by Function 4 employees and placed in Parcel hampers so mailings can be taken directly to the street without further handlings. Mail should not be bundled prior to leave time, unless it is stated in the local agreement. An exception to this process is non-motorized routes which must be bundled out prior to relay delivery cut-off.

Walk sequence volume is defined as letters or flats in sequential order delivery in accordance with the Red Book and the case labels. Sequence volume is not necessarily volume for every delivery, it is mail merely in delivery order that typically covers a significant majority of the residential deliveries. Sequence mail on Foot and Park & Loop delivery must not be cased unless more than one set of requested in-home dates. If more than one set is received, curtailment of any additional sets is the preferred option. However, if more than one set of sequence volume must be delivered that day, the carrier on Foot and Park & Loop delivery may case the additional set(s) of sequence volume to meet the three bundle restriction. Carriers on Curbline and Centralized delivery should be directed to carry the additional sequence bundle(s) directly to the street without casing.

If a set of sequence must be cased so as not to exceed the 3 bundles on Foot and Park & Loop delivery, direct the carrier to case the set with the highest casing productivity.

4 CUSTOMER SERVICE/DELIVERY FLOOR LAYOUT

4-1 Equipment - Case layouts and cell assignments must be reviewed and optimized for efficiency and standardization. Secondary cases for PO Box sections and Window Callers should be eliminated except in extremely unusual circumstances.

A primary letter case 49 cell open back is preferred (and wing if needed) To determine the appropriate number of letter set ups the following formula is to be used: Using a 12-month SPLY analysis of letters to obtain a daily average. Divide SPLY total actual letter pieces by 302. Divide this figure by the office's AWPS letter expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for letter distribution (open to last call) = Number of letter distribution set ups required (round up to nearest whole number).

Rolling stock should be utilized for primary and secondary flat distribution wherever possible. APCs with shelf inserts utilizing three sided cardboard flat trays or Flat Tote Racks utilizing 775 Flat Trays should be used. To determine the appropriate number of flat set ups the following formula is to be used: Using a 12-month SPLY analysis of flats to obtain a daily average. Divide SPLY total actual flats pieces by 302. Divide this figure by the office's AWPS flat expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for flat distribution (open to last call) = Number of flat distribution set ups required (round up to nearest whole number).

Each distribution operation will have an area dedicated to breaking down and/or staging carrier routed bundles, mixed mail containers, etc... into their smaller constituent parts in preparation for distribution to carrier cases or other distribution operations. This area should normally be in an area near the loading dock doors.

Distribution of parcel post is made from incoming containers to large hampers (1046). In some isolated instances where volume is very low year round a small hamper (1033) can be substituted. Where space permits the hampers are to be placed in a "U-shaped" configuration

where the incoming container of parcels is pulled into the center of the "U" for distribution. Hampers are normally placed two to three deep and the distance is such that the distributor is able to lightly toss most parcels into the hamper from in front of the parcel container. The goal is to finalize all parcels with a single handling. Also, the carrier parcel hamper area should be located to facilitate an unencumbered pathway to and from each carrier case and the distance minimized to the extent possible.

Small parcels (SPRs) are received in various containers and may arrive in the unit co-mingled with parcels. SPRs can be sorted in several ways as follows:

- Flat Tote Rack - Flat Tote Racks can be used for sorting SPRs. These racks come in various sizes; the most common size is 20 tubs per rack. SPRs are tossed lightly into the flats tub. When sorting is finished, the racks can be rolled to the carriers cases to spread the tubs of SPRs.
- Flat Tubs on floor in front of 1046's – Distribution of SPRs can be accomplished to flat tubs by placing the tubs on the floor in front of the 1046 hamper set-up. This provides the ability to sort mixed parcels and SPRs at the same time eliminating double handling when two set-up's are used. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs are loaded into the 1046's for distribution to carriers.
- Flat Tubs attached to 1046's – An option to the above process of distribution of SPRs to flat tubs identified above is to affix flat tubs to hampers with "S" hooks attached to the top rail of a 1046 hamper or to use special plastic bins available through the Material Distribution Center that have a bracket that affixes to the top rail of a 1046 hamper. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs remain in place for distribution to carriers.

4-2 Supervisors Workstation - The supervisor's desk or workstation should be located in an area that allows maximum visual coverage of the workroom floor without impeding operations. Consider location of electric, phone and data port outlets.

4-3 Outgoing Mail Staging Area - Generally this setup should be located near the back dock. Proper set ups with placards for separations as noted in the unit IOP are mandatory. See M-39, 117.1e.

4-4 Throwback Case - Case should be labeled per M-39 Exhibit 126.13 as found at page 28 of:

http://blue.usps.gov/delret/ pdf/m39.pdf

4-5 DPS Staging Area - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles.

4-6 Vertical Flat Memorandum - The preferred shelf configuration is the 5 shelf case. Additional information can be found in the M-39 sec 121:

http://blue.usps.gov/cpim/ftp/hand/m39.pdf

Additional info can also be found in the VFC MOU:

http://blue.usps.gov/delret/L3do/city/AM SOP/VFC.pdf

4-7 Hot Case - The hot case should be painted or labeled in a distinct fashion to facilitate easy identification and located in the carriers' line of travel to their exit.

5 CITY DELIVERY – FUNCTION 2B

5-1 Office Percent to Standard - Percent to Standard is determined by dividing actual office hours by the standard office hours. Standard hours are determined by applying the current office time standards (18 / 8/ 70) plus Fixed Office Time (FOT) to the volume for the period in question. By using less hours than standard (Percent to Standard below 100%), the office will show that they are working at a high efficiency level. The effective use of DOIS as well as matching work hours to workload will enable the office to achieve the expected savings.

5-2 Deliveries Per Hour - Deliveries Per Hour (DPH) is cumulative deliveries divided by total city delivery work hours (LDC 21-24, 26-29, & 92) over a given time period. Cumulative deliveries are possible deliveries totaled over the same given time period. The office must be meeting the current FY percentage improvement over SPLY. This goal is an overall effectiveness measurement for each office. The ability to manage both office and street functions simultaneously with the tools and methods described in the AM SOP Implementation Guide for office and street duties will enable the unit to achieve this goal (See sections 5-3, 5-7, and 5-8).

5-3 Managed Service Points (MSP) - MSP is a tool designed to monitor delivery consistency and enhance street management processes. Using this tool, local managers are able to review carrier street performance on a daily basis as they evaluate the consistency of arrival at pivotal locations along a route's line of travel. It also provides a comparison of expected intervals established by route inspection data verses actual performance as well as loading and travel times to and from the route. Carrier AM office time has been historically decreasing as a result of operational changes such as increased DPS, increased processing of flats on automation, IOP implementation, IOP compliance tracking and, in some cases, across the board volume decreases. With more of the average carrier's day being spent on street delivery and with the advent of delivery sequencing for flats, there is a critical need for effective and consistent use of MSP information in daily delivery operations.

A key tool is the MSP Route Report which computes the time difference between actual and scheduled scan times. The time difference, known as 'gap' time, is the variance between the scheduled scan time and the actual scan time for each scan point on the route. As carrier AM office time decreases, the time of the first scan trends to be earlier. The 'gap' time for the route should be maintained throughout the day unless there is a known and approved cause for a change of that time such as pivoting, vehicle breakdown, authorized deviation, etc. It is critical that Postmasters and Mgr., C/S Operations review the MSP Route Report on a daily basis to identify individual routes that show significant variances in 'gap' times. Once the routes are identified, the Postmaster or Mgr., C/S needs to discuss the routes and the 'gap' time variances with the delivery supervisor for follow-up. Local management should plan their street supervision activities to include street supervision for those routes at the times and locations where the significant 'gap' time variances occurred (+ or -) absent known or approved cause.

Supervisor should ensure accurate AVUS records on a daily basis. Daily review of employee vehicle scans including mileage, vehicle and route numbers to ensure accuracy and completeness of entries. The Vehicle Utilization Daily Report should be printed and reviewed to verify accuracy of the all entries. Supervisor should annotate any mileage deviations (usually 2 or more miles +/-) with the reason for the deviation. This report can also serve as a reference when discussing individual carrier performance. All Reports with annotations should be kept in case of potential corrective actions.

5-4 Carrier SOP - Each office should develop a Carrier SOP based on their particular operation. These guidelines will serve as the basic set of instructions for all carriers to follow through the course of the work day. It is vital that all carriers and supervisors are familiar with these guidelines and fully understand the entire process. Careful thought should be given to the SOP and it should not be just a re-hashing of sections from current manuals and handbooks. The SOP

should direct carriers in the order in which they are to perform tasks during their office and street duties. Examples of items to be included in an SOP are:

What to do immediately upon clocking in
When to perform vehicle inspection
When (if at all) withdraws will be made
How and when carrier will obtain parcels
Loading/ Unloading Procedures
No empty equipment is to be left in vehicles
Collection mail procedures

SOPs must be readily available to all effected employees at all times to serve as a reference and a training tool for new employees. It is suggested that a copy of the current SOP be placed in each carrier's route book and displayed on the workroom floor in a manner to allow for easy reference.

5-5 DPS Mail - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles. NOTE: DPS mail for foot routes is to be tied out and placed in relay sacks.

5-6 Daily Management Team Checklist - A daily management checklist is essential to ensure that all requirements of effective supervision have been both performed and completed timely. Postal supervisors have numerous tasks that must be completed daily and it can be easy to have one or two slip and be forgotten as supervisor's attention is pulled by operational situations. By using a checklist, it can remind the supervisor about their assigned duties as well as provide the PM/Manager a reference to review to make sure nothing has been missed. The checklist should be used by multiple supervisors over the course of the day as supervisor's shifts overlap the carrier's day.

A sample checklist is available at the AM SOP web page:
http://blue.usps.gov/delret/_zip/sup_pm_mgr.zip

5-7 Management Instruction - Just like carriers, unit management will need a set of guidelines to ensure that all required functions are completed timely. This Management SOP and the Daily Management Checklist should compliment one another.
Task assignments should be shared among all management team members.
The management SOP and Checklist will vary in the detail provided in each document. The checklist should be a short phrase to explain the task to be completed; the SOP should provide some detail explain the task to be completed.
Daily management tasks that should be included as part of the SOP include:

Prior to Carrier Report Time

Record any unscheduled absences for the day, make schedule adjustments as necessary

Logging into TACS, reviewing and correct any employee clock ring errors, entering missing leave, review of un-authorized Overtime, penalty overtime or guarantee time or unauthorized tour deviations; and printing of appropriate reports. Entries should be made to 1017A or 1017B as appropriate and placed aside ready to discuss with employees after they report to work.

Log into DOIS and review time records for missing time and correction of DOIS clock ring errors. A DOIS clock ring error can be different from a TACS clock ring error. It may be necessary to re-enter TACS to make corrections to TACS rings once DOIS is reviewed.

Once all TACS and DOIS rings have been reviewed and corrected, the following reports should be printed, reviewed and annotated as necessary:

1813- Late Leaving/Returning Report

Route/Carrier Daily Performance Report
Unit Daily Performance Report
Unit Daily Feedback Report
Review of previous days 3996s and 1571s for accuracy and compliance with instructions

Accurate measurement of daily volume (MI-PO-610-2007-1), proper color coding and timely entry into DOIS. Weblink site is http://blue.usps.gov/cpim/ftp/manage/p6102007.pdf Workload Status Report should be printed each time new volume is entered either via DCD or manual entry.

Log into MyPO and pull hold orders, re-deliveries and service issues as necessary.

If available, pull MHTS Reports and take appropriate action as necessary.

After Carrier's Report to Work

Ensure that time card badges are secure, then available for the proper time frame (5 minutes prior to and 5 minutes after scheduled begin tour).

Discuss with each carrier their individual prior day's performance using previously printed reports, 3996 etc., and discuss expectations for today based on workload, MyPO issues, etc..
You should document waiting time as appropriate using local spreadsheet or by instructing employees to make proper clock ring in TACS, and follow up to ensure compliance.

Discuss previous day performance with PM/manager using previously printed reports and discuss expectation for current day based on workload including street supervision.

Finalize expectations with carriers upon completion of distribution.

Initial CSDRS report.

Observe pull down and vehicle loading.

While Carriers are on Street

Street Supervision based on MSP report discrepancies from previous day, scheduled 3999s, area or district street supervision requirements, etc.

Read/respond to message activity.

Update CSDRS as necessary.

During PM Office Time

Monitor unloading / collection procedures.
Initial of review TACS rings including proper end of tour rings, unauthorized OT etc.
Monitor Accountable clearance and cage procedures.
Handle any unexpected situation and update workload assignment changes.
Measure, record and monitor PM casing.

These are examples and by no means an exclusive list. Your operation may require additional items and additional sections to be included in your SOP.

5-8 Daily Street Management and MSP Review - Street management is to be conducted daily by all delivery supervisors in the office. Management focus is based upon safety, issues highlighted by MSP reports, customer driven concerns, and time used in excess of authorized

street time. Each office should have a street management book containing tools appropriate for the use of the supervisor.

Tools for the city supervisor include a complete current 3999 for each route, blank PS Form 4584 – Drivers Observation, PS Form 1564-a, AVUS Vehicle assignment report, route maps, unit pivot plan, a Data Collection Device (DCD) loaded with the Route Inspection Program and a 3999-X to be used in compiling an annual updated 3999 for each route.

Tools for the rural supervisor include 4003s for each route, route maps, unit pivot plan, AVUS vehicle assignment report, blank PS Form 4584s and blank paper for taking notes on new streets, houses, etc. The supervisor should be alert for road construction causing potential detours, potential safety issues, vacant houses and carrier performance. Some guidelines supervisors should keep in mind while observing carriers on the street include:

- Perform street management daily
- Take Arrow Lock Key on street if needed!
- Monitor growth areas for change
- Always keep carrier route safety in mind.
- Complete 4584's as the opportunity arises for quality observations
- Review 4003's on street for correctness, safety, growth
- Observe street delivery performance. Are they fingering mail? Are they dismounting for delivery of parcels/accountables? Time deliveries per minute and notate

While the supervisor is on street management, they should observe and document the actions of the carriers on the street. If driving practices were observed, PS Form 4584 should be completed. After conducting driving and street observations, the supervisor must provide timely feedback to the carrier on any safety or productivity issues that they may have observed.

References:

AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide
Delivery & Retail Headquarters website at http://blue.usps.gov/delivery/city/am_sop.htm
M-39, Management of Delivery Services, Section 134

5-9 Pivot Plans - Pivot Plans are vital tools for use when it is necessary for routes to be carried by multiple carriers in order to meet delivery requirements and objectives. The reason for pivoting the route may be to capture under time or to ensure delivery when your operation is short staffed. Specific information on how to develop pivot plans is available through the DOIS Documentation at:

http://blue.usps.gov/delret/L3do/dsystems/DOIS/aids/pivot%20plan%20maint.doc/

5-10 Route Book - Specific information on Carrier Route book requirements can be reviewed in M-39 126.5b and M-41 section 25 (including exhibits) at
http://blue.usps.gov/cpim/ftp/hand/m39.pdf

6 DELIVERY OPERATIONS

6.1 Missent, Missort, Missequenced - Missent pieces, (wrong office), are incorrect barcodes, Missort pieces, (right office wrong route), and Missequenced pieces, (right route wrong order), are likely machine errors. The 3M case should be located in the line of travel for carriers returning from the street. The 3M case has three cells dedicated to each route, Missent, Missorted, and Missequenced. The supervisor reviews the mail daily. The supervisor reports

reoccurring errors, the same errors three times within a week, in CDRS or local policy. Corrective action should be taken by the Plant or CSBCS or DBCS office.

6-2 Hold Mail - Vacation Hold mail is to be retained at the carrier case. This hold mail should be stored in marked trays under the carrier's case. A uniform vacation hold mail policy, consistent with POM requirements is developed by the Postmaster/Station Manager and communicated to all employees both delivery and clerical, and enforced evenly with all customers. The customer must supply the request in writing, preferably through the web form or through PS Form 8076 "Authorization to Hold Mail".

For long term holds and "Snowbirds", Premium Forwarding Service should be encouraged. Premium Forwarding Service customers should be treated as holds and held at the carrier case. Every Wednesday, a designated employee other than the carrier should package this mail. The package is then sent to the customer via Priority Mail.

Reference: http://blue.usps.gov/cpim/ftp/manuals/pom/pomtc.pdf
Hold mail procedures are discussed in the Postal Operations Manual, POM 611.9.

6-3 Carrier Case Labels - Case labels should be neat and orderly. Nothing is hand written on the labels. Confirm the case labels with the Edit Book. Pull the current 3999 and 1564A from DOIS (Supervisor Work Bench) for the routes to be observed. Verify the line of travel is identical to the 3999. Substantiate the park points and relays have been minimized (1564A).

Each relay is identified by a number on the label of the letter separations. The number is placed under a diagonal line directly under the first street number of the relay to be served.

Route patterns are set up to provide for as few vehicle moves as possible. The ideal location for parking points is at an intersection of two streets where four relays may be carried without the need for a vehicle move. Many variations are possible depending on mail volume, terrain, curb line boxes, traffic, safety, average lot frontage, and eliminating deadheading.

http://blue.usps.gov/cpim/ftp/hand/m41.pdf (Section 323.21 & 221.5)

6-4 Hot Case SOP and Case Cards - Monitor the distribution and missort mail to delivery personnel to ensure that all current days' mail is delivered the same day. The office must have a Hot Case with the Hot Case Card System. Missort mail is to be directed to the Hot Case or throwback case by function four after the Missort mails is collected from the carrier cases. A Hot Case cut-off and clearance time must be established for the office and prominently posted. Cut-off times must be coordinated with current carrier scheduled leaving times. Carriers must comply with Section 291, Handbook M 41: withdraw preferential mail from the Hot case when leaving for their route. The carriers must place a red Hot Case card into the letter and/or flat holdouts for their respective routes.

6-5 Carrier Collection Mail - City carriers should make every attempt to separate out mail in containers as it is collected from customers, whether on the route or on dedicated collection runs. At a minimum, the carrier should separate Express Mail, Priority Mail, small parcels and Target Mail from ordinary collection mail. It has been shown that if the carrier consistently uses the same container system daily it becomes second nature, requiring minimal or no additional time by the carrier/collector.

Rural carriers cannot be required to make more than two separations without additional compensation. For this reason, it is suggested that rural carriers make two hold outs; collection letters and flats, and Priority Mail. These separations take advantage of the capabilities of the automated facer canceller systems in place in most plants, while expediting the isolation and transportation of Priority Mail to the appropriate location. Under the rural compensation system,

rural carriers are already compensated for handling Express Mail and parcels over two pounds separately.

The Integrated Operating Plan (IOP) should specify the mail preparation requirements of each office and the percentage of collection mail required to be at the plant prior to 1800 for cancellation. Collection mail must be dispatched to the plant prepared in the manner required by the plant with as much volume as possible on each dispatch. A consistent mail dispatch set up with the required labeled separations must be utilized in every Customer Service unit. All preferential mail should be dispatched on available transportation and not held. The amount of rolling stock dispatched should be minimized based on volume collected. Consolidations may be made, where possible and reasonable, such as consolidating containerized Priority flats and Priority parcels.

Reference:

http://blue.usps.gov/cpim/ftp/hand/po209.pdf

6-6 1700 Goal - A carrier's return time is based upon a combination of their leaving time, the route's street time and any additional street duties assigned to the carrier for that day. The DOIS Work Load Status Report will show the carrier estimated return time based on these factors. The goal is that all carriers return by 1700, based on the estimated time from DOIS. Management needs to match these return times with current transportation for collection mail and make their assignments accordingly to ensure that all carriers are expected back prior to the final dispatch in order to allow processing to meet their cancellations and operational goals. Managing carrier return time starts with office performance in the morning, making sure carriers are leaving when expected based on actual workload; and includes, effective daily street management focused on identified issues from MSP reports, customer identified issues, and previous carrier performance.

References:

For further information, refer to the AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide, available from the Delivery & Retail Headquarters website at:
http://blue.usps.gov/delivery/city/am_sop.htm
Management Instruction (MI) PO -610-2007-1 dated July 9, 2007.

Branch: 4
City: Nashville, TN
Grievant(s): Class Action

PRE-ARBITRATION SETTLEMENT

CASE #	DRT/GTS #	LOCAL #	GRIEVANT(S)
C11N-4C-C 14306320	08 - 333045	B4-00729-14	Class Action

As a result of pre-arbitration discussions, we mutually agreed to full settlement of the above referenced case as follows:

1. The coffins there are currently at the carrier's case shall remain and be used first for placing flats at the carrier's case. There shall be no new coffins add to any case.
2. The remaining flats shall be placed in tubs at the each carriers case. There shall be no flats placed on the floor except in tubs.
3. Each of the carriers on the attached WebCOINS page (minus the 3 names lined out) shall receive a lump sum payment of $250.00 minus appropriate taxes.

It is further agreed that the above settlement is reached on a non-precedent basis and is not to be cited or referenced by either party in future cases which may arise (except for purposes of enforcement).

Eric Conklin Date
United States Postal Service
Labor Relations Specialist
Tennessee District

Pete Moss Date
National Business Agent
National Association of Letter Carriers
Region 8

Branch: 4
City: Nashville, TN
Grievant(s): Class Action

PRE-ARBITRATION SETTLEMENT

CASE #	DRT/GTS #	LOCAL #	GRIEVANT(S)
CHN-4C-C 14306320	08 - 333045	B4-00729-14	Class Action

As a result of pre-arbitration discussions, we mutually agreed to full settlement of the above referenced case as follows:

1. The coffins there are currently at the carrier's case shall remain and be used first for placing flats at the carrier's case. There shall be no new coffins add to any case.
2. The remaining flats shall be placed in tubs at the each carriers case. There shall be no flats placed on the floor except in tubs.
3. Each of the carriers on the attached WebCOINS page (minus the 3 names lined out) shall receive a lump sum payment of $250.00 minus appropriate taxes.

It is further agreed that the above settlement is reached on a non-precedent basis and is not to be cited or referenced by either party in future cases which may arise (except for purposes of enforcement).

6/3/15
Eric Conklin — Date
United States Postal Service
Labor Relations Specialist
Tennessee District

6/3/15
Pete Moss — Date
National Business Agent
National Association of Letter Carriers
Region 8

U229

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location)
Belle Meade Station Rt 517

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.
I've been a mail carrier for 21 years and always work my flats out of buckets. Now that the flats are lying on the floor it's hard on my back and my knees. I recomend that they put the flats back in the buckets.

Employee	Signature	Date and Tour
	Barry Tinch	8-26-14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)
The process of staging banded flats already on the floor at the corners of the case is part of the Station Area Foundation. The ledges will be loaded with 4-bin stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3ft high. When the ledge is empty, carriers will replenish the ledge with stacks from the floor, remove all plastic shrink wrap at that time. Refresher training will be given to all employees on proper lifting.

Supervisor	Signature	Date
	[illegible]	8/27/2014

III. Approving Official's Action
(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Housekeeping & safety is everyones responsibility work areas must be kept neat & free of clutter. Proper egress must be maintained at all times.

Approving Official	Signature	Date	Date Employee Notified
	[illegible]	8-27-14	[illegible]

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office (After Abatement) PINK—Local Safety Office (Initial Notice) YELLOW—Approving Official BLUE—Employee

U224

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) ___ ___ ___ ___ ___

I. Employee's Action

Area (Specify Work Location)
Belle Meade Post Office 37205

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.
New policy of elimination of use of 1 day old baskets to handle mail
Drawers extra strain on backs, arms, legs shown by repetitive movement causing injuries to work harder, not smarter.
2) Empty bulk order service to employees used baskets available to pull mail sometimes for weeks at a time till they return from vacation and previous forwards weeks.
3) We have use the tubs for decades to separate sifted, UBBM and accumulated for required separation of these previous classes of mail.
4) Should have these available without separation of hiding or handling baskets to separate

Employee	Signature	Date and Tour
	Jerry Lee Moore	8-26-2014 Carrier day / Tour

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*
The process of staging loaded Cts already on the floor @ the corners of the case is part of the Eastern Area Consolidation, the ledges will be loaded with 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3Ct high. When the load is empty, carriers will replenish the ledge with stacks from the floor, remove all plastic shrink wrap that fore. Refresher training will be given to all employees on proper lifting techniques.

Supervisor	Signature	Date
	Bobby Mitchell	8/27/2014

III. Approving Official's Action
(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement)*:
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Housekeeping & safety is everyone's responsibility. Work areas must be kept neat & free of clutter. Aisle space must be maintained at all times.

Approving Official	Signature	Date	Date Employee Notified
	[illegible]	8-27-14	8-28-14

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office *(After Abatement)* PINK—Local Safety Office *(Initial Notice)* YELLOW—Approving Official BLUE—Employee

v 225

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) ___ ___ ___ ___ ___

I. Employee's Action

Area (Specify Work Location): BELLE MEADE STATION

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

MANAGEMENTS REMOVAL OF BUCKETS - INSERTS HAS PLACED UNNECESSARY STRESS ON LOWER BACK AND KNEES. REPETITIVE MOTION AND STRESS ISSUE.

RESCIND NEW RULE BANNING USE OF INSERTS FOR FLAT MAIL

Employee	Signature	Date and Tour
	[signature]	8/26/14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

The process of staging banded flats already on the floor @ the corner of the case is part of the Eastern Area foundation. The ledges will be loaded with 4 to 6 inch stacks of flats. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3 ft high. When the ledge is empty, carrier will replenish the ledge with stacks from the floor. Remove all plastic shrink wrap at that time. Refresher training will be given to all employees on proper flat handling techniques.

Supervisor	Signature	Date
	[signature]	8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement)*:
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

HOUSEKEEPING & SAFETY IS EVERYONE'S RESPONSIBILITY. WORK AREAS MUST BE KEPT NEAT & FREE OF CLUTTER. HIGH STANDARDS MUST BE MAINTAINED AT ALL TIMES.

Approving Official	Signature	Date	Date Employee Notified
	[signature]	8/27/14	8/28/14

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office *(After Abatement)* PINK—Local Safety Office *(Initial Notice)* YELLOW—Approving Official BLUE—Employee

U226

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) ___ ___ ___ ___ ___

I. Employee's Action

Area (Specify Work Location): Bells Mark Union 39 Rowe

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.
8/25 & 8/26 – Mail stacked on floor not in buckets. I had 7 feet both days so instead of 7 smooth, practical moves to pick up buckets and work mail, I had to make 28, repeat 28 awkward twists, turns, and tugs to get mail to work. I am 52 years old and I have already had cancer threatening NECK surgery. I don't need to make 4 x the moves to do the same work. This also caused mental stress at home thinking about next day's work.

Employee	Signature: [illegible]	Date and Tour: 8/26/14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)
The process of staging bundled flats already on the floor @ the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded with 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stack no more than 36" high. When the ledge is empty, carriers will replenish the ledge with stacks from the floor, remove all plastic shrink wrap at that time. Refresher training will be given to all employees on proper lifting.

Supervisor	Signature: [illegible]	Date: 8/27/2014

III. Approving Official's Action
(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Housekeeping & safety is everyones responsibility. Work areas must be kept neat & free of clutter. Aisle space must be maintained at all times.

Approving Official	Signature: [illegible]	Date: 8-27-14	Date Employee Notified: 8-28-14

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE – Local Safety Office (After Abatement) PINK – Local Safety Office (Initial Notice) YELLOW – Approving Official BLUE – Employee

U727

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location): Workroom Floor at case

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

We used to have tubs with flat mail inside. The handles on the tubs were about 12inches from ground level so I didn't have to bend down or over very far to pick up the mail. Now they have removed the tubs and started putting mail directly on the floor. I am concerned with having to bend over all the way to the floor that my back or knees may give out.

Employee	Signature	Date and Tour
	[signature]	8-26-14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

The process of staging banded flats already on the floor @ the corners of the case is part of the Eastern Area Condition. The ledges will be loaded with 4 to 6 in stacks of flats. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 30+ high. When the ledge is empty, carriers will replenish the ledge with ~~stack~~ flats and remove all plastic + shrink wrap @ the time. Refresher training will be given to all employees on proper lifting techniques.

Supervisor	Signature	Date
	[signature]	8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Housekeeping & safety is everyone's responsibility. Work areas must be kept neat & free of clutter. Proper egress must be maintained at all times.

Approving Official	Signature	Date	Date Employee Notified
	[signature]	8-27-14	8-28-14

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office (After Abatement) PINK—Local Safety Office (Initial Notice) YELLOW—Approving Official BLUE—Employee

U228

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) ___ ___ ___ ___ ___

I. Employee's Action

Area (Specify Work Location): Belle Meade 37205

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.: Our flats are being stacked on the floor without being inside the plastic buckets. This will cause me back problems. I cannot stop to pick up the bundle of flats as I have been told to do. I am injured.

Employee	Signature: [illegible]	Date and Tour: 8-23-2014

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.): Attempted at 20% of my times and I cannot bend down because of this. The process of stacking mail (flats) already on the floor @ the corners of the case is part of the Eastern Area delivery foundation. The ledges will be loaded with 9 to 10 inch stacks of mail. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 5 ft high when the ledges are empty. Carrier will be asked to remove all stacks from the ledges with stacks and remove all plastic & check work area. Refresher training will be given to all employees on proper bending and lifting techniques.

Supervisor	Signature: [illegible]	Date: 8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision Is Based Upon:

Housekeeping & safety is everyone's responsibility. Work areas must be kept neat & free of clutter. Aisles & exits must be maintained at all times. Our employees must be trained to perform their duties safely.

Approving Official	Signature: [illegible]	Date: 8-27-14	Date Employee Notified: 8-28-14

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office (After Abatement) YELLOW—Approving Official PINK—Local Safety Office (Initial Notice) BLUE—Employee

FINANCE	OFFICE	LAST	FIRST	MI	EMP ID	JOB ID	JOB TITLE	D/A	FUNC	LOC	HCES ORG ID	EOD
476160	NAS-BELLE MEADE STA	FOWLER	ANTHONY	B	1991624	95384870	CARRIER (CITY)	134	2B	21	1007682	3/5/1973
476160	NAS-BELLE MEADE STA	BERNHARDT	ADRIAN	W	1992319	95117898	CARRIER (CITY)	134	2B	21	1007682	6/28/1993
476160	NAS-BELLE MEADE STA	SANDERS	TERRY	A	2050109	95076836	CARRIER (CITY)	134	2B	21	1007682	3/28/1987
476160	NAS-BELLE MEADE STA	GARRETT	RALPH	W	2077645	95442686	CARRIER (CITY)	134	2B	21	1007682	3/29/1986
476160	NAS-BELLE MEADE STA	CRAIN	KAREN	L	2083212	95164244	CARRIER (CITY)	134	2B	21	1007682	1/3/1985
476160	NAS-BELLE MEADE STA	BASSHAM SR	JAMES	T	2086971	95382099	CARRIER (CITY)	134	2B	21	1007682	3/1/1986
476160	NAS-BELLE MEADE STA	SLATER	STEPHEN	L	2102694	95139256	CARRIER (CITY)	134	2B	21	1007682	3/23/1987
476160	NAS-BELLE MEADE STA	MC DONALD	RICHARD	D	2111016	95105372	CARRIER (CITY)	134	2B	21	1007682	12/9/1985
476160	NAS-BELLE MEADE STA	HUTCHISON	KENNETH	W	2121496	95452802	CARRIER (CITY)	134	2B	21	1007682	6/20/1997
476160	NAS-BELLE MEADE STA	RAY	CARLYON	K	2132643	95107881	CARRIER (CITY)	134	2B	21	1007682	3/1/1986
476160	NAS-BELLE MEADE STA	YARBOROUGH	LISA	R	2133591	95391465	CARRIER (CITY)	134	2B	21	1007682	3/24/2001
476160	NAS-BELLE MEADE STA	TINCH	BARRY	L	2145504	95410456	CARRIER (CITY)	134	2B	21	1007682	7/10/1993
476160	NAS-BELLE MEADE STA	JORDAN	TIMOTHY	L	2165168	70144231	CARRIER (CITY)	134	2B	21	1007682	4/2/1994
476160	NAS-BELLE MEADE STA	MOSER	DENNIS	R	2178441	95439743	CARRIER (CITY)	134	2B	21	1007682	6/7/1986
476160	NAS-BELLE MEADE STA	CHESSMAN	STEVEN	E	2180446	95300538	CARRIER TECHNICIAN	134	2B	21	1007682	1/27/2001
476160	NAS-BELLE MEADE STA	COCHRAN	PAUL	M	2184982	95184037	CARRIER (CITY)	134	2B	21	1007682	1/28/1989
476160	NAS-BELLE MEADE STA	BURNS	WESLEY	A	2197690	95202880	CARRIER TECHNICIAN	134	2B	21	1007682	3/10/2001
476160	NAS-BELLE MEADE STA	GILBERT	MARK	A	2200440	70497519	CARRIER (CITY)	134	2B	21	1007682	11/21/1987
476160	NAS-BELLE MEADE STA	HARRIS	JIMMIE	L	2235431	95410053	CARRIER (CITY)	134	2B	21	1007682	1/4/1986
[illegible]	NAS-BELLE MEADE STA	CLARK JR	LEMAN	D	[illegible]	[illegible]	CARRIER (CITY)	134	2B	21	1007682	[illegible]
476160	NAS-BELLE MEADE STA	CORBIN	MICHAEL	T	2240284	95290081	CARRIER (CITY)	134	2B	21	1007682	8/29/1988
476160	NAS-BELLE MEADE STA	GRAY	MICHAEL	K	2288941	95257269	CARRIER (CITY)	134	2B	21	1007682	2/27/1999
476160	NAS-BELLE MEADE STA	GOWER	JERRY	M	2310253	95172929	CARRIER (CITY)	134	2B	21	1007682	6/20/1987
476160	NAS-BELLE MEADE STA	WALTON	COREY	L	2317114	95290110	CARRIER (CITY)	134	2B	21	1007682	9/23/1994
476160	NAS-BELLE MEADE STA	CONNER	ANDREW	B	2317550	95201630	CARRIER (CITY)	134	2B	21	1007682	9/23/2000
476160	NAS-BELLE MEADE STA	MERCE	TERRY	W	2335085	95080389	CARRIER TECHNICIAN	134	2B	21	1007682	9/28/1987
476160	NAS-BELLE MEADE STA	TOMLINSON	SCOTT	A	2337846	95258653	CARRIER TECHNICIAN	134	2B	21	1007682	4/25/1987
476160	NAS-BELLE MEADE STA	WILSON	MICHAEL	L	2358277	95197976	CARRIER (CITY)	134	2B	21	1007682	4/7/1990
476160	NAS-BELLE MEADE STA	MARTIN JR	JOHN		2368924	95317880	CARRIER (CITY)	134	2B	21	1007682	1/30/1995
476160	NAS-BELLE MEADE STA	SAUNS	MARY	B	2387654	95247606	CARRIER (CITY)	134	2B	21	1007682	1/17/1997
476160	NAS-BELLE MEADE STA	BUTTREY	BRIAN	K	2392913	95311450	CARRIER (CITY)	134	2B	21	1007682	3/1/1989
476160	NAS-BELLE MEADE STA	WILKERSON	DAVID	W	2393944	95142845	CARRIER (CITY)	134	2B	21	1007682	2/25/1989
476160	NAS-BELLE MEADE STA	BALADAD	TEODORICO	A	2396102	95417068	CARRIER TECHNICIAN	134	2B	21	1007682	1/5/1996
476160	NAS-BELLE MEADE STA	DEAN	BRAD	S	2399032	95225024	CARRIER (CITY)	134	2B	21	1007682	3/18/1995
476160	NAS-BELLE MEADE STA	MILLER	JAMES	H	4327390	71092016	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	6/28/2014
476160	NAS-BELLE MEADE STA	SMITH	JASMINE		4344316	71161700	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	1/10/2015
476160	NAS-BELLE MEADE STA	GOVEY	DAVID	R	[illegible]	[illegible]	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	3/21/2016
476160	NAS-BELLE MEADE STA	GORDON	MICHAEL	D	[illegible]	[illegible]	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	[illegible]

FINANCE	OFFICE	LAST	FIRST	MI	EMP ID	JOB ID	JOB TITLE	D/A	FUNC	LOC	HCES ORG ID	EOD
476160	NAS-BELLE MEADE STA	FOWLER	ANTHONY	B	1991524	95334870	CARRIER (CITY)	134	2B	21	1007682	3/5/1973
476160	NAS-BELLE MEADE STA	BERNHARDT	ADRIAN	W	1992318	95117998	CARRIER (CITY)	134	2B	21	1007682	6/28/1983
476160	NAS-BELLE MEADE STA	SANDERS	TERRY	A	2050169	95076836	CARRIER (CITY)	134	2B	21	1007682	3/28/1987
476160	NAS-BELLE MEADE STA	GARRETT	RALPH	W	2077845	95442566	CARRIER (CITY)	134	2B	21	1007682	3/29/1986
476160	NAS-BELLE MEADE STA	CRAIN	KAREN	L	2083212	95154244	CARRIER (CITY)	134	2B	21	1007682	1/3/1985
476160	NAS-BELLE MEADE STA	BASSHAM SR	JAMES	T	2088271	95352009	CARRIER (CITY)	134	2B	21	1007682	3/4/1996
476160	NAS-BELLE MEADE STA	SLATER	STEPHEN	L	2102804	95139256	CARRIER (CITY)	134	2B	21	1007682	3/28/1987
476160	NAS-BELLE MEADE STA	MC DONALD	RICHARD	D	2111015	95105372	CARRIER (CITY)	134	2B	21	1007682	12/3/1985
476160	NAS-BELLE MEADE STA	HUTCHISON	KENNETH	W	2121495	95462002	CARRIER (CITY)	134	2B	21	1007682	6/20/1997
476160	NAS-BELLE MEADE STA	RAY	CARLTON	K	2132843	95167901	CARRIER (CITY)	134	2B	21	1007682	3/1/1986
476160	NAS-BELLE MEADE STA	YARBROUGH	LISA	R	2133591	95391465	CARRIER (CITY)	134	2B	21	1007682	3/24/2001
476160	NAS-BELLE MEADE STA	TINCH	BARRY	L	2140594	95419455	CARRIER (CITY)	134	2B	21	1007682	7/10/1993
476160	NAS-BELLE MEADE STA	JORDAN	TIMOTHY	L	2166168	70164231	CARRIER (CITY)	134	2B	21	1007682	4/2/1994
476160	NAS-BELLE MEADE STA	MOSER	DENNIS	R	2178441	95438743	CARRIER (CITY)	134	2B	21	1007682	6/7/1986
476160	NAS-BELLE MEADE STA	CHESSMAN	STEVEN	E	2183446	95300530	CARRIER TECHNICIAN	134	2B	21	1007682	1/27/2001
476160	NAS-BELLE MEADE STA	COCHRAN	PAUL	M	2184982	95184037	CARRIER (CITY)	134	2B	21	1007682	1/28/1989
476160	NAS-BELLE MEADE STA	BURNS	WESLEY	A	2197660	95202860	CARRIER TECHNICIAN	134	2B	21	1007682	3/10/2001
476160	NAS-BELLE MEADE STA	GILBERT	MARK	A	2200443	70497515	CARRIER (CITY)	134	2B	21	1007682	11/21/1987
476160	NAS-BELLE MEADE STA	HARRIS	JIMMIE	L	2235431	95410953	CARRIER (CITY)	134	2B	21	1007682	1/4/1986
476160	NAS-BELLE MEADE STA	CLARKER	LEMAN	D	2275160	95104576	CARRIER (CITY)	134	2B	21	1007682	1/4/1993
476160	NAS-BELLE MEADE STA	CORBIN	MICHAEL	T	2280284	95209081	CARRIER (CITY)	134	2B	21	1007682	8/29/1988
476160	NAS-BELLE MEADE STA	GRAY	MICHAEL	K	2289041	95257209	CARRIER (CITY)	134	2B	21	1007682	2/27/1998
476160	NAS-BELLE MEADE STA	GOWER	JERRY	M	2316258	95172929	CARRIER (CITY)	134	2B	21	1007682	6/20/1987
476160	NAS-BELLE MEADE STA	WALTON	COREY	L	2317414	95290110	CARRIER (CITY)	134	2B	21	1007682	6/28/1994
476160	NAS-BELLE MEADE STA	CONNER	ANDREW	B	2317559	95231660	CARRIER (CITY)	134	2B	21	1007682	9/23/2000
476160	NAS-BELLE MEADE STA	MERCE	TERRY	W	2335085	95000355	CARRIER TECHNICIAN	134	2B	21	1007682	9/28/1987
476160	NAS-BELLE MEADE STA	TOMLINSON	SCOTT	A	2337846	95258583	CARRIER TECHNICIAN	134	2B	21	1007682	4/25/1987
476160	NAS-BELLE MEADE STA	WILSON	MICHAEL	L	2358277	95197976	CARRIER (CITY)	134	2B	21	1007682	4/7/1990
476160	NAS-BELLE MEADE STA	MARTIN JR	JOHN		2360924	95317890	CARRIER (CITY)	134	2B	21	1007682	1/30/1995
476160	NAS-BELLE MEADE STA	SAUNS	MARY	B	2357894	95247600	CARRIER (CITY)	134	2B	21	1007682	1/17/1997
476160	NAS-BELLE MEADE STA	BUTTREY	BRIAN	K	2362313	95311450	CARRIER (CITY)	134	2B	21	1007682	3/1/1996
476160	NAS-BELLE MEADE STA	WILKERSON	DAVID	W	2363946	95142845	CARRIER (CITY)	134	2B	21	1007682	3/29/1989
476160	NAS-BELLE MEADE STA	BALADAO	TEODORICO	A	2366102	95417368	CARRIER TECHNICIAN	134	2B	21	1007682	1/5/1998
476160	NAS-BELLE MEADE STA	DEAN	BRAD	S	2369032	95225024	CARRIER (CITY)	134	2B	21	1007682	3/18/1995
476160	NAS-BELLE MEADE STA	MILLER	JAMES	H	4327390	71092016	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	6/28/2014
476160	NAS-BELLE MEADE STA	SMITH	JASMINE		4284316	71181700	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	1/10/2015
476160	NAS-BELLE MEADE STA	BOVAY	DAVID	R	4300531	71181018	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	3/21/2015
47910	NAS-BELLE MEADE STA	DOBSON	MICHAEL	D	4400566	71[illegible]	CITY CARRIER ASSISTANT 1	844	2B	21	1007682	[illegible]/2015

Branch: 4
City: Nashville, TN
Grievant(s): Class Action

PRE-ARBITRATION SETTLEMENT

CASE #	DRT/GTS #	LOCAL #	GRIEVANT(S)
C11N-4C-C 14306320	08 - 333045	B4-00729-14	Class Action

As a result of pre-arbitration discussions, we mutually agreed to full settlement of the above referenced case as follows:

1. The coffins there are currently at the carrier's case shall remain and be used first for placing flats at the carrier's case. There shall be no new coffins add to any case.
2. The remaining flats shall be placed in tubs at the each carriers case. There shall be no flats placed on the floor except in tubs.
3. Each of the carriers on the attached WebCOINS page (minus the 3 names lined out) shall receive a lump sum payment of $250.00 minus appropriate taxes.

It is further agreed that the above settlement is reached on a non-precedent basis and is not to be cited or referenced by either party in future cases which may arise (except for purposes of enforcement).

6/3/15
Eric Conklin — Date
United States Postal Service
Labor Relations Specialist
Tennessee District

6/3/15
Pete Moss — Date
National Business Agent
National Association of Letter Carriers
Region 8

National Association of Letter Carriers

Fredric V. Rolando, President

Pete Moss
National Business Agent
NALC Region 8
160 Commissioner Drive
Meridianville, AL
35759-2038
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Nicole Rhine
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Judy Willoughby
Asst. Secretary-Treasurer

Brian Renfroe
Director, City Delivery

Manuel L. Peralta Jr.
Director, Safety & Health

Myra Warren
Director, Life Insurance

Brian E. Hellman
Director, Health Insurance

Ron Watson
Director, Retired Members

Board of Trustees:
Larry Brown Jr.
Chairman
Randall L. Keller
Michael J. Gill

Affiliated with the AFL-CIO &
Union Network International

March 18, 2015

Dave Clark, President
Branch 4
National Association of Letter Carriers
P.O. Box 140816
Nashville, TN 37214-0816

Re: C11N-4C-C 14306320 - Class Action (B4-00729-14) 08-333045

Dear Dave:

Attached is the Step B decision for the above referenced case. As you will note, the grievance has been impassed.

After reviewing this decision and the evidence contained in the file, it has been determined to request arbitration for this matter. Therefore, also attached is a copy of the request for arbitration.

If you have any questions regarding this matter, please feel free to contact me.

In Solidarity,

Pete Moss
National Business Agent
Region 8

PM/sh

Attachment

National Association of Letter Carriers (AFL-CIO)

REQUEST FOR ARBITRATION

Certified No. 7014 1820 0001 3236 0510 DATE: March 18, 2015

TO: LR Appeals
U.S. Postal Service
P.O. Box 25398
Tampa, FL 33622-5398

FROM: NATIONAL BUSINESS AGENT
Pete Moss
160 Commissioner Drive
Meridianville, AL 35759-2038

DISPUTE RESOLUTION PROCESS REQUEST FOR ARBITRATION

USPS NO: C11N4CC14306320
NALC DRT NO: 08-333045
BRANCH GRIEV. NO: B4-00729-14
CLASS ACTION
NASHVILLE, TN
DECISION RECEIVED: 03/09/2015
VIOLATION: IMPROPER PROCEDURE WHEN STAGING MAIL

Dear Sir or Madam:

Pursuant to the provisions of the NALC/USPS Joint Dispute Resolution Process, I hereby appeal the above referenced grievance to arbitration.

Sincerely,

Pete Moss
NATIONAL BUSINESS AGENT

cc: Branch President, NALC
Step B Team
Postmaster

UNITED STATES POSTAL SERVICE®

Date Received at Step B *(MM/DD/YYYY)*

USPS-NALC Joint Step A Grievance Form

INFORMAL STEP A — NALC Shop Steward Completes This Section *(See instructions on page 2.)*

1. Grievant's Name *(Last, first, middle initial)*: CLASS ACTION
2. Grievant's Telephone No. *(Include area code)*:
3. Seniority Date *(MM/DD/YYYY)*:
4. Status *(Check one)*: ☐ FT ☐ FTF ☐ PTR ☐ PTF ☐ CCA
5. Grievant's Employee Identification Number (EIN):
6. District, Installation, Work Unit, ZIP Code®: TN,NASHVILLE,BELLE MEADE 37205
7. Finance No.: 476160
8. NALC Branch No.:
9. NALC Grievance No.: B4-00729-14
10. Incident Date *(MM/DD/YYYY)*: 08/23/2014
11. Date Discussed With Supervisor *(Filing date)*: 9/22/2014

12a Companion MSPB Appeal? ☐ Yes ☐ No

12b. Companion EEO Appeal? ☐ Yes ☐ No

13a. Supervisor's Printed Name, Initials, and Telephone No.: Eric Baxter (EB)

13b. Steward's Printed Name, Initials, and Telephone No.: Corey L. Walton cw

FORMAL STEP A — Formal Step A Parties Complete This Section *(See instructions on page 2.)*

14. USPS Grievance No.: Obtain prior to Formal Step A meeting. K306320

15. Issue Statement: Provide contract provision(s) and frame the issue(s).

SEE ATTACHED Staging Mail on the ground not using inserts

16. Undisputed Facts: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☐ Yes Number ____

BOTH PARTIES HAVE AGREED TO EXTEND THE TIME LIMITS ON THIS GRIEVANCE. THE GRIEVANCE IS TIMELY

Mgt stated that the Amsof provided the Union is the "Eastern Area delivery foundation" as cited on 1767

17. **UNION'S** full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☒ Yes Number 275

18. **MANAGEMENT'S** full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☒ Yes Number 26

19a. Union Representative: Enter the remedy requested by the union.

SEE ATTACHED

19b. Settlement Offer: List any settlement offers by either party on page 3.

20. Disposition *(Check one)* ☐ Resolved ☐ Withdrawn ☒ Not Resolved Date of Formal Step A Meeting *(MM/DD/YYYY)*: 1/9/2015

21a. USPS Representative's Name: Sherry L. Cape

21b. Telephone No. *(Include area code)*:

21c. USPS Representative's Signature: [signature]

21d. Date *(MM/DD/YYYY)*:

22a. NALC Representative's Name: Donald S Onorato

22b. Telephone No. *(Include area code)*:

22c. NALC Representative's Signature: [signature]

22d. Date *(MM/DD/YYYY)*:

UNITED STATES
POSTAL SERVICE

RECEIVED
MAR - 9 2015
NALC REGION 8

STEP B DECISION

STEP B TEAM
Betsy Davis, USPS
Paul F Glavin, NALC

District: Tennessee
DRT Number: 077-15

Decision:	**IMPASSED**
USPS number:	C11N-4C-C 14306320
Grievant:	Class Action
Branch Grievance Number:	B4-00729-14
Branch:	4
Installation:	Nashville
Delivery Unit:	Belle Meade
State:	Tennessee
Incident Date:	08/23/2014
Date Informal Step A Initiated:	09/22/2014
Formal Step A Meeting Date	01/09/2015
Date Received at Step B:	01/12/2015
Step B Decision Date:	03/04/2015
Issue Code:	14.2100, 19.1000
NALC Code:	508399

ISSUE:

1. Did Management violate Articles 5, 14, 15, and 19 of the National Agreement when they began staging mail directly on the ground at carrier's cases rather than in flat tubs? If so, what is the appropriate remedy?
2. Did Management violate Articles 17 and 31 of the National Agreement by not providing requested documentation? If so, what is the appropriate remedy?

DECISION:

The Dispute Resolution Team (DRT) has decided to declare an **IMPASSE.** The Step B Team has considered all arguments and evidence in the case file and any of this material may be cited in the event of arbitration. The NALC National Business Agent may appeal this grievance to arbitration within fourteen (14) days after the receipt of this decision.

UNION'S POSITION:

The Union at Formal A Representative effectively presented the facts and contentions. All of the arguments raised by the Union at the Informal and Formal Step A meetings are brought forward to Step B and at Arbitration. The Step B representative would like to add the following:

National Arbitrator Aaron decision C-04085 dated January 25th, 1984 reads in relevant part as follows:

> It is now well settled that the parties to arbitration under a National Agreement between the Postal Service and a signatory Union are barred from introducing evidence or arguments not presented at preceding steps of the grievance procedure, and that this principle must be strictly observed.

The Union at Step B notes there are no statements or interviews provided by Management in this grievance file to dispute the Unions Contentions or support any argument contended by Management at the Formal Step A Level. The Union further contends Management had every opportunity to interview or present a management statement at the Formal Step A level as a witness or to rebut the Unions full and detailed contentions, but chose not to in this instance. Managements sole contentions are only relevant to they are following the Eastern Area and the AMSOP.

Page 14-2 of the JCAM reads in relevant part as follows:

> It is Management's responsibility to provide safe working conditions; it is the Unions responsibility to cooperate and assist Management in its efforts to fulfill this responsibility

The Union contends Management failed to fulfill the responsibility of this obligation when they unilaterally rescinded the method which the parties at the National Level were advocating as the safest procedure for letter carriers to perform their jobs. The grievance file contains extensive documentation which reveals the Union at all levels has fully engaged with Management in an effort to assist in providing the safest working conditions possible for employees. It also contains evidence Management rescinded innovative ergonomic policies already in place in the Tennessee District which were intended to reduce the number of injuries which are products of muscular skeletal disorders caused by or enhanced by the manner that individuals move their bodies in the course of performing everyday tasks

The Economic Strategic Partnership Between Occupational Safety and Health Administration and United States Postal Service and United States Postal Service Unions is an 8 page agreement with numerous specific references to the parties commitment to the implementation and study of ergonomics in the workplace. It reads in part as follows:

> The USPS,NPMHU,APWU, and OSHA will work cooperatively to implement an ongoing process to identify MSD's early and control the risk factors that can cause injuries and illness to postal employees.

The grievance file contains Section 811.22 of the ELM Handbook which reads as follows:

811.22 Vision Statement

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the OSHA Voluntary Protection Programs (VPP). (See 811.25.) **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction** Program and joint labor–management safety and health committees (see 816). Bold and underline added)

The above provision in Section 811 of the ELM Handbook states the Postal Service will demonstrate a commitment to integrate safe work practices in ALL services. The following documentation in the grievance file reveals the lack of commitment Management in the Belle Meade Station has demonstrated to the Postal Services investment into the safety of their employees.

Page 1 of the Ergonomic Risk Reduction Program (ERRP) and NALC/USPS Safety and Health Pilot Program clarifies the intent of the parties in this program as follows:

> **ERRP is a program, the goal of which is to reduce all injuries that are products of muscular skeletal disorders that are caused by or enhanced by the manner that individuals move their bodies in the course of performing everyday tasks...The two subject programs are supported by both the National Leadership of the USPS and NALC,** as well as the undersigned, and are attempts to collectively raise awareness among Managers, NALC Representatives, and city delivery carriers that safety is all of our responsibilities, and to provide processes by which we can collectively work to reduce accidents and injuries. (Bold and Underline added)

The Union contends the Postal Service at the National Level has put forth the proposition they will become a leader in reducing work related injuries by demonstrating a commitment to integrate safe work practices into all of its services. It also notes the subject programs are supported by both parties at the National Level. Management in the Belle Meade Station has ignored this commitment by the Postal Service when they failed to implement and refused to consider utilizing ergonomically sound safety practices into the standard operating procedures of daily letter carrier work. Letter carriers and local Union representatives have made Management aware of their responsibilities and safety concerns via contractual provisions and National Level agreements in an attempt to correct the situation prior to addressing this safety issue in the grievance procedure.

The EL-809 Handbook reads in relevant part as follows:

> Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

Correspondence Detail dated 11/15/2013 reads in relevant part as follows:

> The Postal Service proposes to revise Handbook EL-809, Guidelines for Area/ Local Joint Labor-Management Safety and Health Committees. **This revision focuses on consideration of ergonomic safety by Area/Local Safety and Health Committees**. (Bold and underline added)

Changes to Handbook EL-809 regarding Duties and Responsibilities of Committee Members read in relevant part as follows:

All Local Safety and Health Committee Members
2. Create and maintain an interest in safety and health and **ergonomics** and thereby help to prevent accidents.
6. Review employee safety and health **and ergonomic** suggestions.
7. Review safety **and ergonomics** training records to determine if all employees are receiving appropriate training.

Page U41 of the Unions Contentions reads in relevant part as follows:

> **Agenda Items:** Special Items: This will include safety and ergonomic education presentations; results of on the spot inspections of troublesome areas with recommendations and action taken.

Changes to Handbook EL-809 were proposed by the USPS and adopted in November 2013. The Postal Service implemented these changes to Handbook EL-809 with emphasis to highlight the Service's commitment of practices meant to encourage the enforcement of ergonomically sound policies at the local level. The Union contends Belle Meade has emerged as a 'troublesome' area and notes there have been no on the spot inspections instigated by Management as well as no recommendations or positive action taken to resolve the concerns of the carriers.

Changes to Handbook EL-809 regarding Duties and Responsibilities of Committee Members read in relevant part as follows:

> 8. Review Forms 1767, Report of Hazard, Unsafe Condition, or Practice, and responses or corrective action taken.

The Union contends there is no documentation included in Managements contentions which reveal any of the employees concerns or ergonomic suggestions were taken into consideration by the Committee Members when they completed and submitted PS Form 1767 in accordance with the provisions of Handbook EL-809 or the ELM Handbook in reference to the Services ergonomic policies.

Management Contentions reads in relevant part as follows:

> Several of the carriers filed a 1767, Report of Hazard, Unsafe Condition or Practice. The general consensus was that staging flats on the floor loose, not in flat tubs is hard on their backs, knees, and excessive repetitive motion.

The Union contends 7 letter carriers in the Belle Meade Station submitted PS Form 1767 to Station Manager Eric Baxter and Supervisor Beverly Montgomery. Each form explained in detail how the change in policy in performing everyday tasks is personally impacting their body and how it may lead to potential adverse and negative impact on their wellbeing. The effects and potential hazards they describe fall within the terminology and definition the National parties agree upon in the Ergonomic Risk Reduction Program.

PS Form 1767 (reverse) instructs USPS Supervisors as to their responsibilities and obligations when they have received a Report of Hazard, Unsafe Condition or Practice from an employee. It reads in relevant part as follows.

a. Investigate the alleged hazard during the same tour of duty in which the report was received.
b. Abate the hazard if it is within the scope of your authority to do so.
c. Record the action taken to eliminate the hazard

PS Form 1767 (reverse) instructs the Approving Official as follows:

a. Initiate action to eliminate or minimize the hazard.
b. If you determine that there are no reasonable grounds to believe a hazard exists, notify the employee in writing within 15 calendar days. Safety personnel will assist you in this determination when requested.

Management contentions read in relevant part as follows:

> "The supervisor, Beverly Montgomery, responded with the same answer on all 1767's. The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks of no more than 3 feet high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."
> The manager, Eric Baxter, responded to all the same also:
> "Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

The Union contends the same generic answer notated on each individual PS Form 1767 reveals the lack of effort and casual attitude Management in the Belle Meade Station has assumed when addressing safety concerns of its employees. Each employee was concerned about the potential for injuries caused by prolonged repetitive movement. There is no documentation provided as evidence any investigation was conducted in accordance with PS Form 1767 (reverse) to determine the specific concerns of each employee was properly taken into consideration prior to Management concluding there were no reasonable grounds to determine a hazard exists. The Station Manager and supervisor dismissed these concerns as good housekeeping issues, instructed the carriers on local standard operating procedures and further instructed them to be safe entering and exiting their work areas by exercising proper egress . Supervisor Montgomery also stated refresher training would be provided to all employees for proper lifting. There is no documentation in the grievance file as evidence this training was provided in accordance with her own determination of action to be taken.

Management contentions read in part as follows:

> Management is abiding by the Eastern Area and AMSOP.

The Union contends Management has submitted the AM SOP as the sole attachment to support their contentions of rescinding and refusing to provide ergonomically sound resources in an effort to assist letter carriers to perform their duties as safely possible. The relevant documentation below reveals the parties at the National Level are committed to implementing new and safe methods in an attempt to minimize MSD injuries in the workplace. Management in the Belle Meade Station sole contentions conveys the fact they are placing operating procedures over the safety and health of

their employees. The financial considerations of the Service are severely comprised when they refuse to recognize the impact long term worker compensation costs are in relation to penny foolish cost cutting to achieve short term goals.

The U.S. Postal Service Office of Inspector General released the following relevant information in 2014:

> Despite the Postal Service's attempts to decrease the number of employees (19 % since 2008), its workers compensation costs have increased 35 percent.

Section VII of the EL-814 USPS Handbook, Postal Employees Guide to Safety reads as follows in relevant part:

> A. Lifting Guidelines
> Lifting is so much a part of our everyday activity that most of us do not think about it, but it's often done incorrectly. The result can include strains, pulled muscles, disc lesions, or painful hernias.

The grievance file contains a statement from NALC Director of Safety and Health, Manuel L. Peralta Jr which reads in relevant part as follows:

> On or about March 1, 2011, the USPS provided the NALC with an update as to ergonomics in the form of a Power Point Presentation. A review of this information shows that 22% of the MSD's suffered by letter carriers occurred in the office.

The same Power Points Presentation page contained a page titled, 'Common High Risk Work Methods or Hazards and Solutions' reads in relevant part as follows:

> 1. **Getting the Mail off the floor** – Tables, tub racks, & upside down flat tubs

The Union contends the above statement was provided by and is substantiated in the grievance file by the USPS's own data which is printed off in Power Point Presentation form. The Postal Service provided this to the NALC in support of the USPS commitment to provide innovative and proactive measures to create an ergonomically sound policy which would benefit the health and well-being of its workforce, as well as provide economic and financial benefits to the Service. The Power Points Presentation provided by the USPS at the National Level concludes with a finding that elevating the mail off the floor with tables, tub racks, and upside down tubs are a solution by to the potential hazard caused by the repetitive motion of bending and lifting the mail off the floor.

Section 833.1 of the ELM Handbook reads in relevant part as follows:

> **833.1 Standards, Ergonomics, and Engineering**
>
> OSHA and applicable consensus safety and health standards, **ergonomic considerations,** and sound safety and fire protection engineering techniques must be used to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment, equipment, tools, supplies used, and the material on which work is performed.**
>
> Purchasing, delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.

NALC Director of Safety and Heath, Manuel L. Peralta Jr provided a statement in this case which reads in relevant part as follows:

Ergonomics Enters the Letter Carrier Craft

> The USPS and NALC committed to bringing the principles of ergonomics into customer service following the positive outcome of the ergonomics program in mail processing. The USPS and NALC pilot tested a roll out in Albany, New York. Subsequently the USPS and NALC agreed to select the San Diego District to expand ergonomics with other districts to follow...Following the experiences and knowledge acquired through our joint efforts on ergonomics with customer service, **the national parties decided to establish a document to share this information with all parties in the field.**

This document (M-01773) signed on April 24, 2008 by NALC President William H. Young and Doug Tulino, Vice President of Labor Relations reads in relevant part as follows:

> Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling of mail. Pilot testing and the customer service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may reduce injuries and Muscular Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects.

The Union contends the elevation of mail is the subject of the dispute between the parties in this grievance and notes this has been addressed by the parties at the National Level in a joint effort to reduce the number of ergonomically related injuries in the work force. One of the three tools suggested by the parties is Mail Elevation Units. 'Milk crates' used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height. Mr. Peralta's statement, as well as the document signed by the parties at the National Level, is evidence of a mutual understanding that injuries associated with the repetitive motions of bending, lifting, and the handling of mail may be reduced with the implementation of ergonomically sound safety procedures.

The grievance file contains an E-Mail transmission dated at 10:14AM October 18, 2013 from Corey Walton to Patricia King who was Safety Manager at the time, which reads in part as follows:

> I just go back from Washington and have a lot to share...Concerning the Ergo topics; I **brought up a concern to them in our telecom about tubs being removed from carriers in Antioch. At the face to face, the head of ergonomics was there as well as the head of OSHA compliance. They were not happy with that decision and said they would be more than happy to look into that if we couldn't get a favorable outcome to that. I think that the tubs should be provided the carriers asap and the mail be placed in those instead of on the floor**...The head of OSHA stated that the district has $10,000 to use for safety and ergonomics...**They want the mail to be at least knee high and at the moment their mail is sitting on the ground...**I don't know who needs to be called or what needs to be done to get them tubs by tomorrow and get that mail off the floor until we can get these crates, but I have numbers of people at National if we get no response here...The Director of Safety and Health, Linda DeCarlo and Christina Johnson, the Occupational Safety and Health Specialist were part of the committee and were impressed with our district.(Bold added)

Safety Manager King replied to Mr. Walton at 10:51. The Email transmission reads in relevant part as follows:

> See what you can find out about Antioch. I have the poom looking into it. I feel the supervisor is not being honest. **Regardless, mails should never at no time ever be sitting on the floor. At any point for any length of time.** (Bold added)

The grievance file contains an Email transmission sent by Corey Walton dated October 22, 2013, which reads in relevant part as follows:

> **Ergonomics is trying to push certain item. The crates elevate the mail off the floor. They want mail to be above the knees...**If there is a push for something, I would like the TN District to be ahead of the pack.

The Union contends the above statements are evidence Management and the Union had a mutual understanding in the TN district of the importance of ergonomics in 2013. The parties were working with the head of ergonomics and OSHA compliance at the National Level in this matter to ensure mail should not be placed on the floor. Safety Manager King was aware of this commitment and reminded Corey Walton that mail should never be on the floor at any point for any length of time. The Union also notes the parties were very impressed with the direction which was being taken at this time on the subject of Ergo topics, and had allocated $10,000 to further the commitment to this policy in the TN District.

The Union has included the minutes of the Tennessee District NALC Task Force meeting dated July 31, 2014 as evidence this commitment had changed. It reads in relevant part as follows:

> Dave Clark asked about flat tubs in the offices. **Charisse explained that flat tubs <u>will not</u> be used to stage bulk mail in the stations and associate offices. <u>Bundles of mail will be staged directly on the floor</u> at the carrier's case.** (Bold and underline added)

The Union contends the above statement directly contradicts the parties understanding of making sure mail is elevated off the floor and above the knees is an ergonomical priority in the district. An ergonomically sound practice had been in place for many years, and was obviously being adhered to in 2013. Management unilaterally chose to discontinue this policy in 2014 in favor of an AMSOP which the Union contends falls short of the responsibilities the parties have agreed to implement in an effort to lessen the likelihood of repetitive motion injuries.

Page 5-1 of the JCAM reads in relevant part as follows:

> **Prohibition on Unilateral Changes. Article 5 prohibits management taking any unilateral action inconsistent with the terms of the existing agreement** or with its obligations under law. Section 8(d) of the National Labor Relations Act prohibits an employer from making unilateral changes in wages, hours or working conditions during the term of a collective bargaining agreement.

Page 5-2 of the JCAM reads in relevant part as follows:

> **Article 5 may also limit the employer's ability to take a unilateral action where a valid past practice exists.** While most labor disputes can be resolved by application of

the written language of the Agreement, it has long been recognized that the resolution of some disputes require the examination of the past practice of the parties.

The Union contends Management in the Belle Meade Station violated Article 5 of the National Agreement when they unilaterally terminated the existing past practice of allowing letter carriers to have the mail at their cases staged in tubs.

Page 5-2 of the JCAM reads in relevant part as follows:

> **Defining Past Practice**
> In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past Practice

National Arbitrator Mittenthal clarifies the definition of Past Practice on Page 5-2 of the JCAM, which reads in relevant part as follows:

> • First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.
> • Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.

The Union contends the documentation provided in this grievance file proves the mutually accepted procedure of staging bulk flat mail in the Belle Meade Station is clear, consistent, and unambiguous. The Union has submitted documentation in the grievance file as evidence this practice has been the ongoing and mutually accepted way of performing these duties since at least 1965. The letter carriers in the Belle Meade Station have submitted 21 statements to provide evidence there has been no change or dispute that the method the parties have used for almost 50 years is the correct and proper way to have flats staged. The Union contends Management never disputes in their contentions this has been the long established practice of performing these duties.

National Arbitrator Richard Mittenthal decision (N8-NAT-006) dated July 10, 1979, reads in relevant part as follows:

> "**Past practice may serve to clarify, implement, and even amend contract language, but these are not its only functions. Sometimes an established practice is regarded as a distinct and binding condition of employment, one which cannot be changed without the mutual consent of the parties.** Its binding quality may arise either from a contract provision which specifically requires the continuance of existing practices or, absent such a provision, from the **theory that long-standing practices which have been accepted by the parties become an integral part of the agreement with just as much force as any of its written provisions** . For a detailed explanation of these principles, see my article, "Past Practice and the Administration of Collective Bargaining Agreements",59 Michigan Law Review 1017 (1961) ." (Bold added)

National Arbitrator Mittenthal describes the last elements of determining a past practice on Page 2 of the JCAM. It reads in relevant part as follows:

• **Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct.** Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.

• **Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality.** Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment."

The Union contends Management has not submitted evidence to show there have been disputes by the parties on how the staging of mail at carrier's cases was to be conducted prior to the unilateral change implemented in 2014. Management does not submit evidence to dispute carrier statements this was the customary means of handling this situation for the past 49 years. The Union contends in the absence of clear language defining this work, there has been a mutually accepted long time practice established in the Belle Meade Station to stage bulk mail in flat tubs at their case. The longevity of this practice is consistent with Arbitrator Mittenthal' s conclusion that this has been accepted by the parties and has become an integral part of the agreement with just as much authority as any of its written provisions.

On page 5-3 of the JCAM, the parties agreed to the following language National Arbitrator Mittenthal created to define a Past Practice.

> **To Implement Separate Conditions of Employment.** Past practice can establish a separate enforceable condition of employment concerning issues where the contract is "silent." This is referred to by a variety of terms, but the one most frequently used is *the silent contract*. For example, a past practice of providing the local union with a file cabinet may become a binding past practice, even though there are no contract or LMOU provisions concerning the issue.

National Arbitrator Mittenthal states when the parties have established an accepted Past Practice to determine how these duties should be completed; it becomes part of a silent contract over a period of time. The Union contends there is no clarifying provision in the National Agreement or Handbooks which identifies the function of performing this duty. The parties have created a silent contract which has endured for at least 49 years according to the evidence in the grievance file. Staging flats in tubs has become the binding practice to determine how the staging of mail at carrier's cases is performed.

Arbitrator Eileen Cenci decision (B06N-4B-C09175879) reads in relevant part as follows:

> Management unilaterally changed the past practice without giving the Union adequate prior notice and without engaging in good faith bargaining over the impact of the change. The clean case policy is to be rescinded and the practice of permitting carriers to keep personal items at their cases is to be reinstated.

On Page 5-3 of the JCAM both parties agreed to the following:

> **Changing Past Practices**
> The manner by which a past practice can be changed depends on its purpose and how it arose. Past practices that implement or clarify existing contract language are treated differently than those concerning the "silent contract."
>
> **Changing Past Practices that Implement or Clarify Contract Language. If a binding past practice clarifies or implements a contract provision, it becomes, in effect, an unwritten part of that provision. Generally, it can only be changed by changing the underlying contract language, or through bargaining.** (Bold added)

On Page 5-4 of the JCAM both parties agreed to the following:

> **Changing Past Practices that Implement Separate Conditions of Employment.** If the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice. **Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit.**(emphasis added)

The Union contends Management did not offer any contentions to dispute there was a valid Past Practice in the Belle Meade Station prior to attempting to terminate this practice. The National Agreement does not contain permissive language and reminds Management Article 5 prohibits them from unilaterally terminating a past practice and mandates they MUST engage in good faith bargaining prior to attempting to make a change.

The Union contends the Postal Service at the National Level has put forth the proposition they will become a leader in reducing work related injuries by demonstrating a commitment to integrate safe work practices into all of its services. The grievance file reveals the development and implementation of ergonomic policies has become a priority in their effort to significantly reduce the number of compensable work related injuries. These policies were in place in the Belle Meade Station until Management unilaterally eliminated the practice of staging flats in tubs and chose to place them directly on the floor. The documentation in the Unions contentions provides evidence this new policy is not in compliance with the directives and additions in Management's own handbooks and manuals which mandates supervisors and managers at the local level to ensure ergonomic policies are in place.

The Union further contends there has been a long time past practice of staging flats in tubs at the carrier's cases, and Management chose to rescind it without giving proper notice or negotiating in good faith in an attempt to change it. When all the evidence provided by the Union is objectively considered and carefully examined, it will show Management in the Belle Meade Station proceeded in a reckless manner, ignoring the parties directives from the National Level as well as numerous provisions of the National Agreement and USPS handbooks and manuals when they rescinded ergonomic policies already in place and unilaterally changed this long existing past practice in their effort to implement local policies.

MANAGEMENT'S POSITION:

The Management Formal A representative effectively presented the Facts and Contentions. All of the arguments raised by Management at the Informal and Formal Step A meetings are brought forward to Step B and at Arbitration. The Step B representative would like to add the following:

Management contends Article 3 of the National Agreement gives them the right to direct employees in the performance of their official duties. Management determines the methods, means, and personnel by which said operations are to be conducted. Management cites the National AM Standard Operating Procedure (AMSOP) in defense of their arguments.

Article 3 of the National Agreement reads as follows:

> The employer shall have the exclusive right, subject to the provisions of this agreement and consistent with applicable laws and regulations:
> a. to direct employees of the employer in the performance of official duties;
> B. to hire, promote, transfer, assign, and retain employees in positions within the Postal Service and to suspend, demote, discharge, or take other disciplinary action against such employees;
> **c. to maintain the efficiency of the operations entrusted to it;**
> **d. to determine the methods, means, and personnel by which such operations are to be conducted;**
> e. to prescribe a uniform dress to be worn by letter carriers and other designated employees; and
> f. to take whatever actions may be necessary to carry out its mission in emergency situations, i.e., an unforeseen circumstance or a combination of circumstances which calls for immediate action in a situation which is not expected to be of a recurring nature.

Management notes the following statement from the Step B Union Representative:

> "An ergonomically sound practice had been in place for many years, and was obviously being adhered to in 2013. **Management unilaterally chose to discontinue this policy in 2014** in favor of an AMSOP which the Union contends falls short of the responsibilities the parties have agreed to implement in an effort to lessen the likelihood of repetitive motion injuries."

In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice (JCAM page 5-2). He explained as follows:

> Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is **supported by mutuality**. Some practices are the product, either in their inception or in their application, of a joint understanding; **others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.**

Management contends **there is a mutual agreement regarding placement of flats at the carrier's case; the National AMSOP**, as well as contractual language. The union has failed to provide any signed document in which management at any time agreed to the practice of placing flats in tubs at the carrier's cases.

Management contends the **AMSOP was released on a national basis during Fiscal Year 2005**. The primary intent and purpose of the process was to standardize daily carrier office functions and incorporate an Integrated Operating Plan (IOP) into the management of carrier AM office procedures. One will notice this National Policy does not incorporate language to permit the placement of carrier routed pre-sort bundles into flat tubs at the carrier's cases.

Management submits the following excerpt from the National AMSOP:

3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:
- **ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).** (emphasis added)
- ALL mail with any future day's color code shall be placed **on the floor** on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- **All mail will be placed neatly as close as possible next to the case legs.**
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats

- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- **Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.** (emphasis added)
- ALL labels are to be removed from empty equipment.

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) **or on the floor if no fibredome**. AFSM Standard mail is assumed to be for today's delivery. All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse. (emphasis added)

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) **or on the floor if no fibredome** after the flats have been measured by the supervisor/manager. (emphasis added)

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker. (emphasis added)

Management notes the only categories of mail shown to be placed in flat tubs are ledge loaded and standard flat mail, which is worked on the AFSM and considered preferential mail. **The AMSOP states all presort bundles shall be stacked by the case legs in 2 foot stacks.**

Article 19 of the National Agreement reads in relevant part as follows:

> Those parts of all handbooks, manuals and published regulations of the Postal Service, that directly relate to wages, hours or working conditions, as they apply to employees covered by this Agreement, shall contain nothing that conflicts with this Agreement, and shall be continued in effect except that the Employer shall have the right to make changes that are not inconsistent with this Agreement and that are fair, reasonable, and equitable. This includes, but is not limited to, the Postal Service Manual and the F-21, Timekeeper's Instructions.

Page 19-1 of the JCAM instructs the parties as follows:

> **Handbooks and Manuals.** Article 19 provides that those postal handbook and manual provisions directly relating to wages, hours, or working conditions are enforceable as though they were part of the National Agreement. **Changes to handbook and manual provisions directly relating to wages, hours, or working conditions may be made by management at the national level and may not be inconsistent with the National Agreement. A challenge that such changes are inconsistent with the National Agreement or are not fair, reasonable, or equitable may be made only by the NALC at the national level.** (emphasis added)

Handbook M-39, Management of Delivery Services, reads in relevant part as follows in Section 122, Scheduling Carriers:

> 122 **Scheduling Carriers**
> 122.1 **Establishing Schedules**
> 122.11 Consider the following factors in establishing schedules:
> a. Schedule carriers to report before 6 a.m. only when absolutely necessary.
> b. Fix schedules to coincide with receipt and dispatch of mail. At least 80 percent of the carriers' daily **mail to be cased should be on or at their cases** when they report for work. (emphasis added)

Handbook M-41, City Delivery Carriers Duties and Responsibilities, reads in relevant part as follows in Section 223.2 Magazines, Papers, and Other Flat Mail:

> 223.21 Withdraw magazines, papers, and other flat mail from flat cases and **place neatly in basket <u>or on floor at case</u>** when they are not at carrier case upon reporting. Don't obstruct aisle space or create a tripping hazard. (emphasis added)
>
> 223.22 If the flats for your route are received in sacks, remove the flats promptly, and **stack neatly on the floor** or in hampers when provided. Examine sacks after dumping to insure that sacks are empty. Place empty sacks in the designated receptacle after removing sack labels. (emphasis added)

Section 921.13 of the M-41 Handbook reads as follows:

> 921.13 The mail of all classes available to the carrier is (a) that mail distributed and placed on carrier case ledges, in hampers, trays, **<u>or on the floor</u>** beneath the carrier case, and (b) that mail which is in distribution cases up to the cut-off or final withdrawal time prior to departure to serve the last delivery trip of the week of count. (emphasis added)

Management notes several of the carriers at the Belle Meade Station have filed PS Form 1767, Report of Hazard, Unsafe Condition or Practice. Management determined the general consensus was staging flats on the floor is hard on their backs and knees due to the repetitive motion. Management contends Supervisor Beverly Montgomery responded with the same answer on all of the submitted PS Form 1767s as follows:

> "The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inches stacks. Volume in excess of this shall be neatly stacked on the floor beside the case in stacks of no more than 3 ft high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."

Management notes Station Manager Eric Baxter responded on the PS Form 1767 as follows:

> "Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

The Union contends seven letter carriers in the Belle Meade Station submitted PS Form 1767. The Union states "the same generic answer notated on each individual PS Form 1767 reveals the lack of effort and casual attitude Management in the Belle Meade Station has assumed when addressing safety concerns of its employees." Management contends this accusatory statement can be deemed speculation at best, as the Union has no way of determining Management's attitude on this issue. What can be proven is Management's response is within the boundaries of the National AMSOP.

Management submits the following provisions from the EL-814, Postal Employees Guide to Safety, as evidence employees are trained in safe lifting techniques:

> **Section VII: Lifting, Material Handling and Other Equipment**
>
> A. Lifting Guidelines

Lifting is so much a part of our everyday activity that most of us do not think about it, but it's often done incorrectly. The results can include strains, pulled muscles, disc lesions, or painful hernias.

Before lifting anything check the immediate area and route of travel to be sure that no obstruction or hazard can cause a slip, trip, or fall, or a *striking against* accident.

The technique for proper lifting is simple:

- **Assess the load. If it appears to be too heavy or bulky to lift comfortably, get help.**
- Place one foot alongside the object being lifted and one behind. This method gives you greater stability and your rear foot gives you better upward thrust. **Use the *sit–down* position and keep your back in a straight line (though not necessarily perpendicular to the floor). A straight back keeps your spine, back muscles and organs in correct alignment and minimizes the compression of organs that can cause a hernia.**
- Tuck in your chin so your neck and head are in a straight line with your back. That helps keep your spine straight and firm. It is not necessary, however, to force your chin against your chest.
- A palm grip is one of the most important elements of correct lifting. Keep your fingers and hands extended around the object you are going to lift, using your full palm. Fingers alone have very little power; you need the strength of your entire hand.
- **Keep the load you are lifting drawn close against your body; tuck your arms and elbows against your side.**
- When your arms are held away from your body, they lose much of their strength and power. Keeping your arms tucked in also helps keep your body weight centered.
- **Position your body so that your weight is centered over your feet. This provides a more powerful line of thrust and also ensures better balance. Start the lift with a thrust of your rear foot.**
- **Avoid twisting during lifting**; twisting is one of the most common causes of back injury. By simply turning your forward foot out and pointing it in the direction you are moving, you will avoid the greatest danger of injury.
- Do not fight to recover a dropping object or *lost load*. Get out of its way and let it fall.
- **Sudden lifting or releasing of loads can cause stress to the spine and back muscles. Always lift, move, and lower with smooth motions.** (emphasis added)

Management contends all carriers have been trained on safe lifting techniques. Management notes the propensity of clerks to over-fill a flat tub could potentially lead to greater injury because a carrier could misjudge the weight of the tub. Placing bundled mail directly on the floor gives the carrier a better ability to judge the weight they are picking up. Management contends carriers are credited and paid for using safe lifting techniques when their route is inspected. There should be no greater risk of injury simply because mail is not staged in flat tubs; in fact, the risk of injury should be lessened as carriers can more easily assess the weight they are lifting.

Management at the Step B level notes the Formal Step A Union representative stated "the AMSOP is based on management's speculation and is in contradiction to ergonomic safety practices." Management contends all ergonomic programs and agreements cited by the Union reference recommendations and suggestions, none of which give specific Postal Policy as cited in the National AMSOP evidenced by Management. Further,

Management contends the burden of proof is on the Union to demonstrate by a preponderance of the evidence the Employer has violated either the terms of the Collective Bargaining Agreement or the Handbook which is incorporated into the Agreement. The Management Rights provisions of the Collective Bargaining Agreement further provide that management shall have the right to maintain efficiency and determine the methods by which operations shall be conducted.

The following Pre-Arbitration decision explains Management's obligation in notification to the Union when there will be a change or institution of a new work measurement system, work, or time standards as follows:

> **M-01489 Pre-Arbitration June 9, 2003, Q94N-4Q-C-98063238**
> Without prejudice to either party' position on the specific facts of this case, is agreed that it is the Postal Service' responsibility to notify and keep the NALC informed at the national level, pursuant to Article 34 of the National Agreement, during the making, at the national level or by a field unit, "of time or work studies which are to be used as a basis for changing current or instituting new work measurement systems or work or time standards."

Management submits the Arbitration for Case B98N-4N-C00235097 in support of their contentions as follows:

> Award Summary: Management did not violate the National Agreement when it drafted, posted and instructed employees relative to a standard operating procedure. The SOP was not intended to and did not modify any manual or contract and did not change working conditions, **An attempt to standardize practices within an office is not a per se violation of the contract**. Nor did the actions violate the Administrative Support Manual.
>
> ...the intent of the SOP was to assist carriers in understanding their duties. **It contained many excerpts from the manuals but unlike the extensive manuals, placed the descriptions of duties in the order in which they were to be performed by the carriers. It was intended to be a convenient reference and was not intended to modify or contradict the M-39 or M-41. Nor does management believe that the SOP contradicted the requirements of the ASM.**
>
> ...Such a violation would occur only if the SOP actually modified or altered working conditions established by the national agreement, the local MOU or manuals incorporated into the contract by Article 19.
>
> **Attempting to standardize practices within an office is not a violation of the National Agreement. The Union has not established that the implementation of the SOP in Natick actually modified any manual or contractual working condition. Consequently, I find no violation.**

Management contends there have been absolutely no changes to the carriers' work measurement systems, work, or time standards as cited in Article 5 of the National Agreement which reads as follows:

> The Employer will not take any actions affecting wages, hours and other terms and conditions of employment as defined in Section 8(d) of the National Labor Relations Act which violate the terms of this Agreement or are otherwise inconsistent with its obligations under law.

Management notes Section 8(d) of the National Labor Relations Act as follows:

> (d) Obligation to bargain collectively For the purposes of this section, to bargain collectively is the performance of the mutual obligation of the employer and the representative of the employees to meet at reasonable times and confer in good faith with respect to wages, hours, and other terms and conditions of employment, or the negotiation of an agreement or any question arising thereunder, and the execution of a written contract incorporating any agreement reached if requested by either party, but such obligation does not compel either party to agree to a proposal or require the making of a concession: Provided, That where there is in effect a collective-bargaining contract covering employees in an industry affecting commerce, the duty to bargain collectively shall also mean that no party to such contract shall terminate or modify such contract, unless the party desiring such termination or modification.

Management contends the citation of the NLRA Section 8(d) reveals no employee rights violations. Management contends the effectuation of the AMSOP does not alter letter carriers work, work hours, or wages and does not conflict with Article 19 of the National Agreement as there have been no handbook alterations. Management contends the Union has not appropriately met the requisite burden of proof in this contract case and it is for this reason and for all of the reasons cited in the grievance file that Management requests this grievance denied in its entirety.

The Dispute Resolution Team (DRT) has decided to declare an **IMPASSE.** The Step B Team has considered all arguments and evidence in the case file and any of this material may be cited in the event of arbitration. The NALC National Business Agent may appeal this grievance to arbitration within fourteen (14) days after the receipt of this decision.

This grievance file contained the following documents:

(1) PS Form 8190
(2) Issue Statement and Requested Remedy (2 Pages)
(3) Union Contentions (9 Pages)
(4) Table of Contents Unions Informal Step A
(5) Statement From Manuel L. Peralta Jr. (6 Pages)
(6) Job Safety Analysis (Generic) (2 Pages)
(7) Ergonomic Risk Reduction Program Agreement (2 Pages)
(8) (M-01773) (2 Pages)
(9) Ergonomics PowerPoint Presentation (9 Pages)
(10) Alan Moore Memo (3 Pages)
(11) Proposed Changes to EL-809 (6 Pages)
(12) Guidelines for Area/Local Joint Labor-Mgmt Safety & Health Comm. (36 Pages)
(13) Proposed Changes to EL-809 (6 Pages)
(14) Guidelines for Area/Local Joint Labor (22 Pages)
(15) Job Safety Analysis (Generic)
(16) Accident Control Team: Accident Root Causes (8 Pages)
(17) Accident Control Team PowerPoint (8 Pages)
(18) Job Safety Analysis (Generic) (2 Pages)
(19) "Good Ideas" Project (4 Pages)
(20) "Good Ideas" Memo (2 Pages)
(21) 2005 Comprehensive Statement on Postal Operations (2 Pages)
(22) Accident Control Team Draft (2 Pages)

(23) Ergonomic Strategic Partnership (8 Pages)
(24) Ergonomic Risk Reduction Agreement
(25) "Good Ideas" Project (3 Pages)
(26) Request For Information (2 Pages)
(27) Time Limit Extension
(28) Eric Baxter Statement
(29) AMSOP Memo
(30) AMSOP Review Guide (18 Pages)
(31) AMSOP PowerPoint (15 Pages)
(32) Time Limit Extension
(33) Course 17534-05 Facilitator Guide, Article 5 (4 Pages)
(34) Carrier Statements (21 Pages)
(35) Staging Mail Volume (3 Pages)
(36) Request For Information from Eric Baxter
(37) TN District Task Force Meeting (3 Pages)
(38) Photographs (18 Pages)
(39) PS Form 1767 (7 Pages)
(40) Dead Tree Edition Blog: Are USPS Changes Leading to Injuries? (2 Pages)
(41) Email Transmission (4 Pages)
(42) Fax Transmission
(43) Step B Decision C11N-4C-C14118408 (5 Pages)
(44) PS Form 8190
(45) Formal Step A Resolution Form
(46) Step B Decision C11N-4C-C14260088 (5 Pages)
(47) Arbitration Decision C11N-4C-C14123103 (11 Pages)
(48) Time Limit Extension
(49) Management Contentions (2 Pages)
(50) AMSOP Review (18 Pages)
(51) PS Form 1767 (6 Pages)

In reaching the above decision, the DRT carefully reviewed each of the documents and placed the appropriate value to each as it applied to the issue in this grievance.

Betsy Davis
USPS Step B Representative

Paul F Glavin
NALC Step B Representative

DRT Number 077-15

Cc: Pete Moss, NALC Region 8 NBA
Roberta Albright, Eastern Area Labor Relations Manager
Jill Miniard, Eastern Area Labor Relations Representative
Sherry Carr, Management Formal A Representative
Donald S. Onorato, NALC Formal A Representative
David Dillman, District Manager
Charisse Gamble, District Human Resources Manager
Joel Barnes, District Labor Relations Manager

UNITED STATES POSTAL SERVICE®

Date Received at Step B (MM/DD/YYYY)

USPS-NALC Joint Step A Grievance Form

INFORMAL STEP A — NALC Shop Steward Completes This Section (See instructions on page 2.)

1. Grievant's Name (Last, first, middle initial): CLASS ACTION
2. Grievant's Telephone No. (Include area code):
3. Seniority Date (MM/DD/YYYY):
4. Status (Check one): ☐ FT ☐ FTF ☐ PTR ☐ PTF ☐ CCA
5. Grievant's Employee Identification Number (EIN):
6. District, Installation, Work Unit, ZIP Code®: TN,NASHVILLE,BELLE MEADE 37205
7. Finance No.: A76160
8. NALC Branch No.:
9. NALC Grievance No.: B4-00729-14
10. Incident Date (MM/DD/YYYY): 08/23/2014
11. Date Discussed With Supervisor (Filing date): 9/22/2014
12a. Companion MSPB Appeal? ☐ Yes ☐ No
12b. Companion EEO Appeal? ☐ Yes ☐ No
13a. Supervisor's Printed Name, Initials, and Telephone No.: Eric Baxter EB
13b. Steward's Printed Name, Initials, and Telephone No.: Corey L. Walton

FORMAL STEP A — Formal Step A Parties Complete This Section (See instructions on page 2.)

14. USPS Grievance No.: Obtain prior to Formal Step A meeting. 14306320

15. Issue Statement: Provide contract provision(s) and frame the issue(s).

SEE ATTACHED

16. Undisputed Facts: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☐ Yes Number ____

BOTH PARTIES HAVE AGREED TO EXTEND THE TIME LIMITS ON THIS GRIEVANCE. THE GRIEVANCE IS TIMELY

Mgt stated that the ATMSOP provided the Union is the "Eastern Area delivery foundation" as cited on 1767

17. UNION'S full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☒ Yes Number 275

18. MANAGEMENT'S full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☒ Yes Number 26

19a. Union Representative: Enter the remedy requested by the union.

SEE ATTACHED

19b. Settlement Offer: List any settlement offers by either party on page 3.

20. Disposition (Check one) ☐ Resolved ☐ Withdrawn ☒ Not Resolved Date of Formal Step A Meeting (MM/DD/YYYY) 1/9/2015

21a. USPS Representative's Name: Sherry L. Carr
21b. Telephone No. (Include area code):
21c. USPS Representative's Signature: [signature]
21d. Date (MM/DD/YYYY):
22a. NALC Representative's Name: Donald S Onorato
22b. Telephone No. (Include area code):
22c. NALC Representative's Signature: [signature]
22d. Date (MM/DD/YYYY):

ISSUE STATEMENT

Did management violate Articles 5,14,15 and 19 of the National Agreement when they began staging flat mail directly on the ground at carriers cases rather than in flat tubs? If so what is the appropriate remedy? Also did mgt violate 17 & 31 by not providing it's requested documentation

REQUESTED REMEDY

(1)The practice of staging flats in flat tubs at carriers cases be restored immediately. (2)Each carrier at Belle Meade station be compensated $20.00 a day from the incident date until the practice of staging flats in flat tubs at carriers cases has been restored; this is due to the extreme negligence displayed by management in placing carriers in an unsafe situation after National Safety Committee member Corey L. Walton informed them this was an unsafe practice. (3)Management be required to take an ergonomics course to educate them on best practices as encouraged by the National Agreement between Doug Tullino and Billy Young. (4)Tennessee District Safety Manager Kim Alley be required to go through extensive Ergonomics training to educate her fully on her responsibilities as it pertains to keeping carriers safe statewide, or whatever is deemed appropriate

Remedy:

The Union requests that Management cease and desist violating Articles 5 and 14 of the JCAM.

Management be ordered to immediately restore the practice of staging flat mail at city carriers cases in the flat tubs.

Each carrier affected by management's blatant disregard for their safety be compensated $20.00 a day until the practice of staging flats at the carriers cases in flat tubs is restored. The reason that the Union considers this to be a blatant violation is due the the numerous conversations and emails as well as 1767's that has brought this to management's attention yet they still chose to put the carriers in a known unsafe position.

Each person in management be mandated to take a course in ergonomics and its effect on the human body.

Ms. Kim Alley be ordered to take a class on ergonomics and be reprimanded for failing to do her job as District Safety Manager. This ultimately falls at her feet. She refused to stand up and tell those that were responsible that this is putting carriers in a known unsafe position. The minutes of our District safety meeting are included in the case file. She was present and it is obvious that she remained silent when it came time to voice her concern about the carriers being placed in an unsafe position.

Union Contentions
B4-00729-14
Class Action
Past Practice (Staging Flats)
Belle Meade Station

The issue in this grievance is did manage violate Articles 5, 14, 15, and 19 of the National Agreement when they began staging flat mail directly on the ground at carriers' cases rather than in flat tubs. Also, did management violate Articles 17 and 31 of the National Agreement by not providing requested documentation.

Pages 5-1 and 5-2 of the Joint Contract Administration Manual (JCAM) address the prohibition of unilateral change and the definition of past practice. They read in relevant part as follows:

> **Prohibition on Unilateral Changes.** Article 5 prohibits management taking any unilateral action inconsistent with the terms of the existing agreement or with its obligations under law. Section 8(d) of the National Labor Relations Act prohibits an employer from making unilateral changes in wages, hours or **working conditions** during the term of a collective bargaining agreement.
>
> **Defining Past Practice**
> In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice:
>
> - First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.
>
> - Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.
>
> - Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct. Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.
>
> - One must consider, too, the underlying circumstance which give a practice its true dimensions. A practice is no broader than the circumstances out of which it has arisen, although its scope can always be enlarged in the day-to-day administration of the agreement. No meaningful

description of a practice can be made without mention of these circumstances. For instance, a work assignment practice which develops on the afternoon and midnight shifts and which is responsive to the peculiar needs for night work cannot be automatically extended to the day shift. The point is that every practice must be carefully related to its origin and purpose.

- Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality. Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.

The union contends management has violated Article 5 of the National Agreement in regard to making unilateral changes in working conditions as well as changing past practices. The grievance file contains statements from city letter carriers at Belle Meade Station (pages U178-198) which state that flats have been staged at the letter carrier cases in flat tubs for as long as they have worked at the Post Office. Some of these carriers have been working for the Post Office for 30-40 years.

Pages U199-200 of the file are a diagram titled Southeast Area Staging Mail Volume. These diagrams clearly show flats being staged at the carriers' cases in flat tubs/bins.

Page U149 of the grievance file addresses the subject of Flat Mail Placement at Carrier Case. It reads in relevant part as follows:

3-11 Flat Mail Placement at Carrier Case

Flats are to be either ledge loaded or placed in Fiberdome. **Significant improvements in city and rural carrier performance as measured by percent to standard can be expected where clerks either ledge load or place in Fiberdomes carrier routed automated flats or presort flats in lieu of the more traditional method of simply stacking automated flat containers at the carrier cases and allowing each carrier to unload the flats and handle the empty flat trays.** Refer to 3-10 of the AMSOP Implementation Guide.

Section 3-10 Staging and Spreading Mail, reads in relevant part as follows:

3-10 Staging and Spreading Mail

Setup, staging and spreading of all mail types must be accomplished so that mail is presented to the carriers in a timely manner to insure delivery is able to maximize efficiency in office and street duties. **All manual letters and flats must be spread by F4 personnel, reducing or minimizing carrier withdrawal time.**

Pulldown is the withdrawal of mail from distribution cases in preparation for spreading the mail to carrier cases. Efficient pulling ensures improving the flow of mail and enhancing distribution. **Carrier withdrawal of letter and flat mail should be eliminated wherever local conditions permit.** The work hours used to pull, withdraw and spread mail is greatly minimized through the use of rolling stock. Therefore, rolling stock should be considered in every office where space permits.

The union contends that management has violated Article 5 of the National Agreement by unilaterally changing the staging methods of mail in the morning without first notifying the union and bargaining in good faith.

Page U118 of the file contains a copy of the signed agreement between the union and management regarding Tools for Injury Reduction ("Good Ideas")—U.S. Postal Service/National Association of Letter Carriers National Joint Safety Task Force. These "good ideas" tools were approved to help reduce injuries and muscular-skeletal disorders. It reads in relevant part as follows:

- Utility/Mail Hooks—plastic rods with a hook to extend the reach of the carrier in loading/unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles.
- **Hamper Inserts—inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail.**
- **Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting).** Sort bins attached to carrier cases are also alternatives for raising flats off the floor.

Page 5-4 of the JCAM reads in relevant part as follows:

> **Changing Past Practices that Implement Separate Conditions of Employment.** If the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice. Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit. If the parties are unable to agree, the union may grieve the change.

The union contends that management is in violation of Article 5 due to the fact that the union was never notified that the signed agreement from April 24, 2008 was going to be considered obsolete and management would now stage flats directly on the floor, putting the carriers at greater risk of injury and muscular/skeletal disorders.

Article 14 of the National Agreement addresses Safety and Health. It reads in relevant part as follows:

> **14.1 Responsibilities**
> It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Union will cooperate with and assist management to live up to this responsibility. The Employer will meet with the Union on a semiannual basis and inform the Union of its automated systems development programs. The Employer also agrees to give appropriate consideration to human factors in the design and development of automated systems. Human factors and ergonomics of new automated systems are a proper subject for discussion at the National Joint Labor-Management Safety Committee.

14.2 Cooperation

The Employer and the Union insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions. Mechanization, vehicles and vehicle equipment, and the work place must be maintained in a safe and sanitary condition, including adequate occupational health and environmental conditions. The Employer shall make available at each installation forms to be used by employees in reporting unsafe and unhealthful conditions. If an employee believes he/she is being required to work under unsafe con - ditions, such employee may:

(a) notify such employee's supervisor who will immediately investigate the condition and take corrective action if necessary;

(b) notify such employee's steward, if available, who may discuss the alleged unsafe condition with such employee's supervisor;

(c) file a grievance at Formal Step A of the grievance procedure within fourteen (14) days of notifying such employee's supervisor if no corrective action is taken during the employee's tour; and/or

(d) make a written report to the Union representative from the local Safety and Health Committee who may discuss the report with such employee's supervisor.

Upon written request of the employee involved in an accident, a copy of the PS Form 1769 (Accident Report) will be provided. Any grievance which has as its subject a safety or health issue directly affecting an employee(s) which is subsequently properly appealed to arbitration in accordance with the provisions of Article 15 may be placed at the head of the appropriate arbitration docket at the request of the Union.

On Page U236 of the grievance file is an email from Belle Meade union steward and NALC district safety co-chair Corey Walton to Bruce Goetz, Eastern Area Safety Manager. Mr. Walton asked Mr. Goetz about the mail being placed on the floor, and what the Eastern area's position was on the subject. Mr. Goetz replied as follows:

> Since this is being grieved I am cautious to comment. My opinion doesn't speak for the entire Postal Service and depending on what level the grievance enters I will not provide my opinion.

On Pages U233-235 of the grievance file are email exchanges between Mr. Walton and then-Manager of Safety Pat King. Mr. Walton repeatedly tried to get the ergonomic recommendations in place in the Tennessee district, but did not receive any meaningful cooperation from Ms. King.

Pages U203-204 are copies of the minutes of the district safety meeting conducted on September 30, 2014. Mr. Walton addressed the subject of mail being staged directly on the floor in contradiction to ergonomic policies. Charisse Gamble, Manager of Human Resources, replied that flat coffins were used in high volume offices. Mr. Walton responded that in Belle Meade, a high volume office, that sometimes there is 10-11 feet of flats that will not fit in the flat coffins. NALC Branch 4 President Dave Clark then addressed the subject of flat tubs in the offices. Ms. Gamble replied that flat tubs will not be used to stage bulk mail in the stations and associate offices, that bulk mail will be

staged directly on the floor at the carriers' cases. The union contends that this repeated insistence of staging mail directly on the floor is in violation of Article 14 due to the unsafe requirement of carriers to pick things directly off the floor repeatedly in order to fulfill their morning requirements.

Page U201 is a copy of the Tennessee District Staff Spot Audit performed at Belle Meade Station on 9/14/14 by John D. Crockett. Next to Question 6 (Are carriers cases clean and clear of empty equipment?) Mr. Crockett wrote the following in the comments section:

> At least 2 carriers requested the use of flat tubs at case to prevent bending down. Unnecessary—flat coffins installed with more forthcoming.

Pages U206-223 of the grievance file contains photographs showing that most of the carriers' flat coffins are full, and mail is still being stacked directly on the floor. The mail is not always neatly stacked, and sometimes is falling onto the floor. The union contends that this is presenting a safety hazard to the carriers and anyone else who may walk by at the wrong time.

Pages U224-230 contain copies of PS Forms 1767 Report of Hazard, Unsafe Condition or Practice. The carriers who filled out these forms refer to the awkward bending and twisting required to pick up flats directly from the floor, and for the need to have the mail properly elevated in the ergonomically correct position. Each 1767 has the same, generic response from the immediate supervisor and the approving official. The immediate supervisor, Beverly Montgomery, wrote on each 1767:

> The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded with 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3 feet high. When the ledge is empty, carriers will replenish the ledge with stacks from the floor, removing all plastic shrink wrap at that time. Refresher training will be given to all employees on proper lifting techniques.

The approving official, then-Station Manager Eric Baxter, wrote on each 1767:

> Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times.

The union contends that management has failed to take any action to improve the safety of carriers in regard to keeping mail from becoming a hazard on the floor, and is unwilling to use the ergonomic tools suggested in the April 2008 agreement in order to provide the carriers with a safe work environment.

Page U202 of the file contains a letter dated September 17, 2014 from then-Station Manager Eric Baxter to union steward Corey Walton. It reads in relevant part as follows:

> Per your request for information extension, I am requesting the interview questions that you will be asking the author of the Eastern Area delivery foundation.

Mr. Walton's reply is also on page U202, which reads as follows:

> As per my conversation with Sandy Quick [Manager of Customer Service Operations; conversation took place September 16, 2014], I need the memo as stated on the 1767's, the Eastern Area Delivery Foundation. I will base my questions off of this memo. I will not be furnishing any questions to anyone in advance.

The union contends that management was less than truthful about an Eastern Area Delivery Foundation being in existence. The union also contends that management instead provided the union with an AMSOP from operations support. The union further contends that management was more concerned about getting Mr. Walton's questions and coming up with rebuttals rather than providing a safe work environment to the carriers as required by Article 14 of the National Agreement.

Pages U1-131 of the grievance file contain the statement and contentions of Manuel L. Peralta, Jr., the Director of Safety and Health for the National Association of Letter Carriers. Page U2 references the Mail Elevation Units previously mentioned. Also mentioned on pages U2-3:

> In addition to the signed national level agreement, the National Joint Labor-Management Safety Committee prepared what we commonly identify as a Job Safety Analysis (JSA) as required by OSHA as found in 29 CFR Section 1910.132(d)(2).
>
> In the section titled "Sequence of Basic Steps" the national parties identified two work functions:
>
> 1. **Place mail on an elevated work surface**
> 2. **Removing mail from an elevated surface**
>
> In the section titled "Potential Hazards and Effects" the national parties identified the following:
>
> **1.1 Hazard: Placing load onto a low level surface**
> **Effect: The lifting hazards are repeated for the next lifter. Back, shoulder, and knee strain while lowering the load to the floor.**
>
> **1.2 Hazard: Mail falling to the floor**
> **Effect: Struck by, or slip/trip/falling hazard**
>
> In the section titled "Safe Work Practices" the national parties identified the following:
>
> **1.1 Invert plastic milk crates or tubs on the floor (or other appropriate alternatives) to elevate the mail and reduce repetitive bending/reaching.**
>
> **1.2 Position mail so that it rests securely on the platform.**
>
> **22.1 Use safe lifting techniques.**

Referenced on Pages U3-4 are the provisions in the USPS Employee and Labor Relations Manual (ELM) that refer to ergonomics:

> **811.22 Vision Statement**
>
> The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the

OSHA Voluntary Protections Programs (VPP). **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction Program and joint labor-management safety and health committees.**

833 Safety and Health in Design, Procurement, and Construction

833.1 Standards, Ergonomics, and Engineering

OSHA and applicable consensus safety and health standards, **ergonomic considerations**, and sound safety and fire protection engineering techniques **must be used** to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment**, equipment, tools, supplies used, and the material on which work is performed. Purchasing, **delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.** Managers responsible for purchasing, design, and construction are accountable for compliance with OSHA standards and applicable fire protection and building codes.

The union contends that management is in violation of Article 19 via Sections 811 and 833 with their failure to follow ergonomically sound recommendations via staging flat mail on the floor as opposed to staging flat mail in tubs/buckets as had been done previously.

Page U139 of the grievance file contains a letter from then-Station Manager Eric Baxter to union steward Corey Walton that was presented at the Informal Step A meeting. It reads in relevant part as follows:

> The documentation dated April 24, 2008 between Tuilino [sic] and Young isn't an agreement. It's a "good ideas" suggestions that has nothing to do with flat tubs but it's talking about hampers.

Page U11 clearly states the following:

> **Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting).** Sort bins attached to carrier cases are also alternatives for raising flats off the floor.

The union contends that management is wrong in its insistence that the documentation has nothing to do with flat tubs.

The grievance file also contains an article titled "Are USPS Changes Leading to More Work-Related Injuries?" (pages U231-232). The union contends that if management was truly concerned about cutting its Workers' Compensation costs, it would follow through 100% with all of the ergonomic recommendations and good ideas that have been suggested, discussed, and implemented. However, the union contends management would rather try to cut expenses at the risk of an increase in work-related injuries. Such logic is what is commonly referred to as "penny wise and pound foolish."

Pages 17-3 and 17-4 of the JCAM read in relevant part as follows:

> **Steward Rights.** Article 17.3 & 17.4 establish several steward rights:

• The right to investigate and adjust grievances and problems that may become grievances;

• The right to paid time to conduct those activities;

• The right to obtain management information;

• Superseniority concerning being involuntarily transferred;

• An employee's right to steward representation during an Inspection Service interrogation.

Steward Rights—Activities Included. A steward may conduct a broad range of activities related to the investigation and adjustment of grievances and of problems that may become grievances. These activities include the right to review relevant documents, files and records, as well as interviewing a potential grievant, supervisors and witnesses. Specific settlements and arbitration decisions have established that a steward has the right to do (among other things) the following:

• Complete grievance forms and write appeals on the clock (see below).

• Interview witnesses, including postal patrons who are off postal premises (National Arbitrator Aaron, N8-NA-0219, November 10, 1980, C-03219; Step 4, H1N-3U-C 13115, March 4, 1983, M-01001; Step 4, H8N-4J-C 22660, May 15, 1981, M-00164);

• Interview supervisors (Step 4, H7N-3Q-C 31599, May 20, 1991, M-00988);

• Interview postal inspectors (Management Letter, N8-N-0224, March 10, 1981, M-00225);

• Review relevant documents (Step 4, H4N-3W-C 27743, May 1, 1987, M-00837);

• Review an employee's Official Personnel Folder when relevant (Step 4, NC-E 2263, August 18, 1976, M-00104)

Page 31-2 of the JCAM reads in relevant part as follows:

Information. Article 31.3 provides that the Postal Service will make available to the union all relevant information necessary for collective bargaining or the enforcement, administration or interpretation of the Agreement, including information necessary to determine whether to file or to continue the processing of a grievance. It also recognizes the union's legal right to employer information under the National Labor Relations Act. Examples of the types of information covered by this pro vision include:

• attendance records
• payroll records
• documents in an employee's official personnel file
• internal USPS instructions and memorandums
• disciplinary records
• route inspection records

- patron complaints
- handbooks and manuals
- photographs
- reports and studies
- seniority lists
- overtime desired and work assignment lists
- bidding records
- wage and salary records
- training manuals
- Postal Inspection Service Investigative Memoranda (IM)
- Office of Inspector General Report of Investigation (ROI)

To obtain employer information the union need only give a reasonable description of what it needs and make a reasonable claim that the information is needed to enforce or administer the contract. The union must have a reason for seeking the information—it cannot conduct a "fishing expedition" into Postal Service records. Settlements and arbitration awards have addressed the union's entitlement to information in certain specific areas.

The union contends that management is in violation of Articles 17 and 31 due to their failure to provide the requested information. Pages U136-137 of the grievance file contain the union's requests for information, specifically the Eastern Area Delivery Foundation. Management failed to provide this, but instead provided an AMSOP. The AMSOP is based on management speculation and is in contradiction to ergonomic safety practices.

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PP U136-U137 Information requests

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PP U174-U200 Article 5 language, statements from carriers, Southeast Area staging mail volume report

PP U201-U223 OPS Audit report, MGTS request for questions to author of Eastern Area Delivery Foundation, Minutes of District safety meeting, Pictures of flat mail at cases.

PP U224-U230 Carriers 1767's

PP U231-U232 Dead tree Edition

PP U233-U234 Emails

PP U237 Fax Confirmation

PP U238-U242 B-Team decision Chattanooga

On or about September 9, 2014, I was asked by Shop Steward Corey Walton to provide a statement on the subject of ergonomics and elevating mail from the floor.

As background to my involvement on ergonomics in the USPS I offer the following:

Ergonomics enters the Letter Carrier Craft

The USPS and the NALC committed to bringing the principles of ergonomics into customer service, following the positive outcome of the ergonomics program in mail processing. The USPS and the NALC pilot tested a roll out in Albany, New York. Subsequently the USPS and the NALC agreed to select the San Diego District to expand ergonomics with other districts to follow.

In March of 2005, key players from management and all craft in San Diego were selected and then trained for the initial ergonomics work group which would oversee the ergonomics roll out for the San Diego Installation. During this time frame I was a Regional Administrative Assistant and I was assigned to go through the two day training in San Diego along with the selected team members.

After this initial training, a number of other teams were developed for use throughout the entire San Diego District. District Manager John Platt and I conducted a number of on site presentations so that everyone in the district was briefed as to the program.

Following the experiences and knowledge acquired through our joint efforts on ergonomics with customer service, the national parties decided to establish a document to share the this information with all parties in the field.

National Support for Good Ideas

On April 24, 2008, William H. Young, National President of the NALC and Doug A. Tulino, Vice President of Labor Relations, USPS Headquarters memorialized their agreement on ergonomics tools (M#01773). This document included the following observations:

> Consistent with its ongoing commitment to improve safety, the

> National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling mail. Pilot testing and the Customer Service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may help reduce injuries and MuscularSkeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects).

Among the three tools listed is:

> Mail Elevation Units-"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting). Sort bins attached to carrier cases are also alternatives for raising flats off the floor. (Flats Sequencing System sites should coordinate plans for future equipment based on anticipated flat volume to be handled at the case.)

The above mentioned Mail Elevation tool is in fact the issue in dispute for the current grievance.

OSHA Job Safety Analysis Requirement

In addition to the signed national level agreement, the National Joint Labor-Management Safety Committee prepared what we commonly identify as a Job Safety Analysis (JSA) as required by OSHA as found in 29 CFR Section 1910.132(d)(2).

The JSA identified as "NALC Good Idea - Elevating Mail from the Floor" was prepared by the NALC Joint Safety Task Force on April 25, 2008.

In the section titled "Sequence of Basic Steps" the national parties identified two work functions:

1. Place Mail on an elevated work surface
2. Removing Mail from an Elevated Surface

In the section titled "Potential Hazards and Effects" the national parties identified

the following:

1.1 Hazard: Placing load onto a low level surface
Effect: The lifting hazards are repeated for the next lifter. Back, Shoulder, and knee strain while lowering the load to the floor.

1.2. Hazard: Mail falling to the floor
Effect: Struck by, or slip/trip/falling hazard

2.1. Hazard: Improper lifting techniques
Effect: Strain when handling mail

In the section titled "Safe Work Practices" the national parties identified the following:

1.1 Invert plastic milk crates or tubs on the floor (or other appropriate alternatives) to elevate the mail and reduce repetitive bending/ reaching.

1.2 Position mail so that it rests securely on the platform.

22.1 Use safe lifting techniques.

The JSA referenced above is not signed, but there is no dispute that it was created by the national parties to assist in expansion and sharing of the good ideas.

Ergonomics in the Employee and Labor Relations Manual

Further, the Employee and Labor Relations Manual contains the following two relevant ergonomic references:

811.22 Vision Statement

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the OSHA Voluntary Protection Programs (VPP). (See 811.25.) **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction**

Program and joint labor-management safety and health committees (see 816). (emphasis added)

833 Safety and Health in Design, Procurement, and Construction

833.1 Standards, **Ergonomics**, and Engineering: OSHA and applicable consensus safety and health standards, **ergonomic considerations**, and sound safety and fire protection engineering techniques **must be used** to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment**, equipment, tools, supplies used, and the material on which work is performed. Purchasing, **delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service**. Managers responsible for purchasing, design, and construction are accountable for compliance with OSHA standards and applicable fire protection and building codes. (emphasis added)

NALC seeks to expand Ergonomics

In the summer of 2010, I was elected, by the consent of the membership, to the position of NALC Director of Safety and Health. Following my election, my predecessor requested authorization to have me begin attending meetings of the National Safety Committee.

In my first meeting which I estimate to be in early September of 2010, I was re-introduced to Mr. Eric Clark, who now holds the position of Manager, Ergonomics Programs at USPS Headquarters. I say re-introduced as Mr. Clark was one of the key managers in the 2005 San Diego Roll out. During this meeting I inquired as to what it would take to further roll out ergonomics in our workplace, which Mr. Clark was unable to answer.

On or about March 1, 2011, the USPS provided the NALC with an update as to ergonomics in the form of a PowerPoint Presentation. A review of the information shows that 22% of the MSDs suffered by letter carriers occurred in the office.

During a number of opportunities since 2011, the NALC has repetitively surfaced

ergonomics during our national safety task force meetings, seeking to further expand on this process.

Ergonomics in the EL-809

By letter dated November 13, 2013, (received by the NALC on November 14, 2014) the USPS provided the NALC with notice of Article 19 changes to the EL-809, Guidelines for Area/Local Joint Labor Management Safety and Health Committees. Attached to the notification letter is an explanation of the purpose of the changes and the anticipated impact.

In Section V the USPS explained the purpose to be:

> Suggests including ergonomics as a permanent agenda item for each meeting to review ergonomics resources and provide possible solutions for their local sites.

This section also defined the anticipated impact to be:

> Opportunity for reduction of MSD[1] related injuries and illnesses to employees at their sites.

In Section VII the USPS explained the purpose to be:

> Provides available ergonomic resources to the local committee.

This section also defined the anticipated impact to be:

> Provides ergonomic awareness on available resources.

Following the 6 pages explaining the changes, the NALC was provided with a copy of the EL-809 with the proposed revisions showing language to be deleted or moved to another section (strike through) as well as new language (shown in red with underlining).

---

[1] Musculoskeletal Disease

The NALC did not contest the proposed changes which became final 60 days after the NALC received the notification.

Statement from

Manuel L. Peralta Jr.

Director of Safety & Health
National Association of Letter Carriers

U7

Job Safety Analysis (Generic)

Title: NALC Good Idea - Use of LLV/FFV Mail Hook

*Note: This document verifies the hazard asse
as required by 29 CFR 1910.13

Location (e.g., Station, Branch, Plant)	Job Description: Loading/removing mail trays/tubs from cargo are of delivery vehicles	Titles of Employees Performing the Job:	Occupational
Name: Street Address: City: State: Zip Code: Area: PC:	Location Description: Carrier Street Duties	Carriers – Rural and City	

Author	Local Reviewer	Local/Area/National Reviewer
Name: NALC Joint Safety Task Force Title: Members Date: 2/25/08	Name: Date: Approval:	Name: Date: Approval:

Sequence of Basic Steps	Potential Hazards and Effects	Safe Work Practices	Required PPE*
1. Remove/store mail hook from/to storage location	1.1. Hazard: Unsecured mail hook can become flying projectile Effect: Injury when struck by flying mail hook	1.1. Keep mail hook properly secured when not in use. (Vehicle Maintenance Bulletin (VMB) V-06-03)	Appropriate Footwear (all sections).
2. Move mail toward front of vehicle	2.1. Hazard: Overextension, from pushing the containers Effect: Back, knee, or shoulder strain 2.2 Bolts on floor of cargo area Effect: Trays can hang up 2.3. Mail hook can become unhooked from tray Effect: Overextension	2.1. Maintain a neutral posture. Don't overextend the body 2.2 Make sure that equipment is not obstructed 2.3 Push mail hook with an even motion keeping it level with the load	
3. Move mail toward rear of vehicle	3.1 Hazard: Overextension reaching in Effect: Back, knee, or shoulder strain 3.2 Hazard: Mail hook can become unhooked from tray Effect: Fall backwards, injured by the mail hook	3.1. Maintain proper posture. 3.2. Use containers that are in good condition. Insure container/parcel is securely engaged by the mail hook	

Ergonomic Risk Assessment:	Health Risk Assessment Code:	Safety Risk Assessment:

Qualitative/Quantitative Exposure Assessment Data	Supporting Postal Service Policy Documents

Supporting Safety Talks	Supporting JSAs	Required Training	
Title:	Link:	Course No.	Course Title:

Job Safety Analysis (Generic)

Title: NALC Good Idea - Loading and Unloading 1046P Hampers with Raised Platforms (inserts)

*Note: This document verifies the hazard asse
as required by 29 CFR 1910.13

Location (e.g., Station, Branch, Plant)	Job Description: Removing Mail from the Floor (Reducing Repetitive Bending)	Titles of Employees Performing the Job:	Occupational
Name: Street Address 1: City: State: Zip Code: Area: PC:	Location Description: Workroom floor	Carriers – City and Rural	

Author	Local Reviewer	Local/Area/National Reviewer
Name: NALC Joint Safety Task Force Title: Members Date: 2/25/2008	Name: Date: Approval:	Name: Date: Approval:

Sequence of Basic Steps	Potential Hazards and Effects	Safe Work Practices	Required PPE*
1. Inspect hamper	1.1. Hazard: Damaged hampers/inserts Effect: Cuts from sharp edges/splintered wood	1.1. Inspect hampers before loading, look for broken parts, ripped fabric, splintered wood and jagged steel. If a defect is found, "Red Tag" (Form 4707) hamper/insert and follow procedures to repair or discard hamper/insert	Appropriate Footwear (all sections).
2. Load and unload hamper	2.1. Hazard: Awkward posture when loading hamper Effect: Shoulder, back, and leg strain when handling mail 2.2. Hazard: Unbalanced/overloaded hamper Effect: Overexertion or strain when trying to catch falling load 2.3. Hazard: Lifting trays Effect: Overexertion or strain	2.1. Position body as close to hamper as possible. Keep mail close to body. Keep back as straight as possible. Avoid twisting body with load. Slightly bend knees and lower load into hamper. 2.2. Load hamper so that mail is evenly distributed. Do not overload. Do not try to catch load if it starts to fall. 2.3. Position hamper close to load. Use proper lifting techniques	

Ergonomic Risk Assessment:	Health Risk Assessment Code:	Safety Risk Assessment:

Qualitative/Quantitative Exposure Assessment Data	Supporting Postal Service Policy Documents

Supporting Safety Talks	Supporting JSAs	Required Training	
Title:	Link:	Course No.	Course Title:

UNITED STATES POSTAL SERVICE

NATIONAL ASSOCIATION OF LETTER CARRIERS [AFL-CIO]

SUBJECT: Ergonomic Risk Reduction Program [ERRP] and NALC/USPS Safety and Health Pilot Program

August 1, 2005

TO: All San Diego District MPO's and Installation Heads and All NALC Branch Presidents With Jurisdiction Within the San Diego District

As most of you are aware, the NALC and the Postal Service are jointly engaged in the above referenced programs, the goals of which are necessary for us all to support 100%. It is our intent to provide clarification and understanding of those two processes by way of the explanations in this letter and to solicit your placing a high prioritization on these endeavors.

Historically, Article 14 of the National Agreement between the United States Postal Service [USPS] and the National Association of Letter Carriers [AFL-CIO] [NALC] has long placed the responsibility of maintaining a safe and healthy work environment within our delivery units and on city delivery routes as a joint responsibility of both Postal Management and NALC Union Leaders. Traditionally, that responsibility has not always been shouldered in a cooperative and joint manner by the parties. The two subject programs are supported by both the National Leadership of the USPS and the NALC, as well as the undersigned, and are attempts to collectively raise awareness among Managers, NALC Representatives, and city delivery letter carriers that safety is all of our responsibilities, and to provide processes by which we can collectively work to reduce accidents and injuries.

ERRP is a program, the goal of which is to reduce all injuries that are products of muscular skeletal disorders that are caused by or enhanced by the manner that individuals move their bodies in the course of performing everyday physical tasks. There are presently two Districts in the entire Pacific Area that are involved in ERRP as a test site. The San Diego District is one of them. ERRP is being implemented by providing necessary training to individuals in every delivery unit on the proper way to lift, pull, and move so to lessen the possibility of incurring a muscular skeletal disorder. The ERRP process also requires committees, consisting of managers and representatives from the various Postal Unions, including the NALC, to meet and discuss ways and means to strategize and implement methods for employees to perform workday tasks while minimizing their risk in developing muscular skeletal disorders and related injuries. Your full participation and support for those training sessions and meetings is a necessity. The process is supported by an ergonomist and a District Coordinator. Presently, the District Coordinator is letter carrier Tyrone Horsely.

SUBJECT: Ergonomic Risk Reduction Program [ERRP] and NALC/USPS Safety and Health Pilot Program **August 1, 2005**

The National leadership of the Postal Service and the NALC have also agreed to initiating a Pilot Program, covering all of the Pacific Area, which requires the establishment of Area, District, and Local Safety Committees. The primary function of these committees is to jointly review data that reflects on the job injuries and motor vehicle accidents and to jointly develop strategies for minimizing injuries and accidents in the future. Your support for the meeting and strategies derived by these committees is also a must.

Although these two programs may seem to overlap in certain responsibilities, their respective tasks can be separated. ERRP focuses on the avoidance of muscular skeletal disorder [MSD] related injuries by identifying causes of those injuries at the workplace and on delivery routes and providing training and new ways of physically moving in an ergonomically safer way so as to avoid MSD's and the related injuries that occur. The safety committees at the District and Local levels, jointly review data on non-MSD injuries and motor vehicle accidents, and provide training, develop strategies to mimize those accidents and injuries, and jointly strategize to enhance awareness among managers and letter carriers to make working and driving safely a high priority.

We believe that both of these programs are important and should be given the highest priority by all Managers, Union Representatives, and Letter Carriers. By reducing MSD related injuries, other injuries, and accidents of all types we can dramatically reduce the pain and suffering those injuries cause to letter carriers and dramatically reduce the huge costs to the Postal Service that results from those injuries and accidents. Our desire is to maximize the use of ERRP and the Safety Committee concepts, jointly preach safety consistantly at all levels of our organizations within this District, jointly encourage letter carriers to work both safer and smarter, and to dramatically decrease all injuries and accidents to letter carriers in this District.

For these goals to succeed, we need all of your collective support and joint cooperation.

We both thank you, in advance, for your anticipated cooperation

Sincerely,

JOHN E. PLATT
District Manager, Customer Service and Sales
San Diego District
United States Postal Service

DALE P. HART
National Business Agent
Region #1
National Association of Letter Carriers [AFL-CIO]

M-01773

UNITED STATES
POSTAL SERVICE

April 24, 2008

VICE PRESIDENTS, AREA OPERATIONS
NATIONAL BUSINESS AGENTS, NATIONAL ASSOCIATION OF LETTER CARRIERS

SUBJECT: Tools for Injury Reduction ("Good Ideas")—U.S. Postal Service/National Association of Letter Carriers' National Joint Safety Task Force

Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling mail. Pilot testing and the Customer Service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may help reduce injuries and Muscular-Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects).

A description of the approved tools is attached. Local managers who want to use these items should engage their National Association of Letter Carriers—National Business Agent; the Area and District Manager, Safety; and (where in use) the District Safety Committee.

Additional information including testimonials from carriers involved in testing can be found on the Safety and Environmental Resources web page at: http://safetytoolkit.usps.gov/resources.aspx.

The "good ideas" tools are:

- Utility/Mail Hooks—plastic rods with a hook to extend the reach of the carrier in loading/unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles

- Hamper Inserts—inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail

- Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting). Sort bins attached to carrier cases are also alternatives for raising flats off the floor. (Flats Sequencing System sites should coordinate plans for future equipment based on anticipated flat volume to be handled at the case.)

We appreciate your consideration of these tools, and your continued support in safety improvement.

Doug A. Tulino
Vice President
Labor Relations
U.S. Postal Service

William H. Young
President
National Association of
Letter Carriers, AFL-CIO

475 L'Enfant Plaza SW
Washington DC 20260

Sort Bins: Postal Products Unlimited (see contact information above), item # N1020317 (Right) / item # N1020318 (Left)

U13

Ergonomics

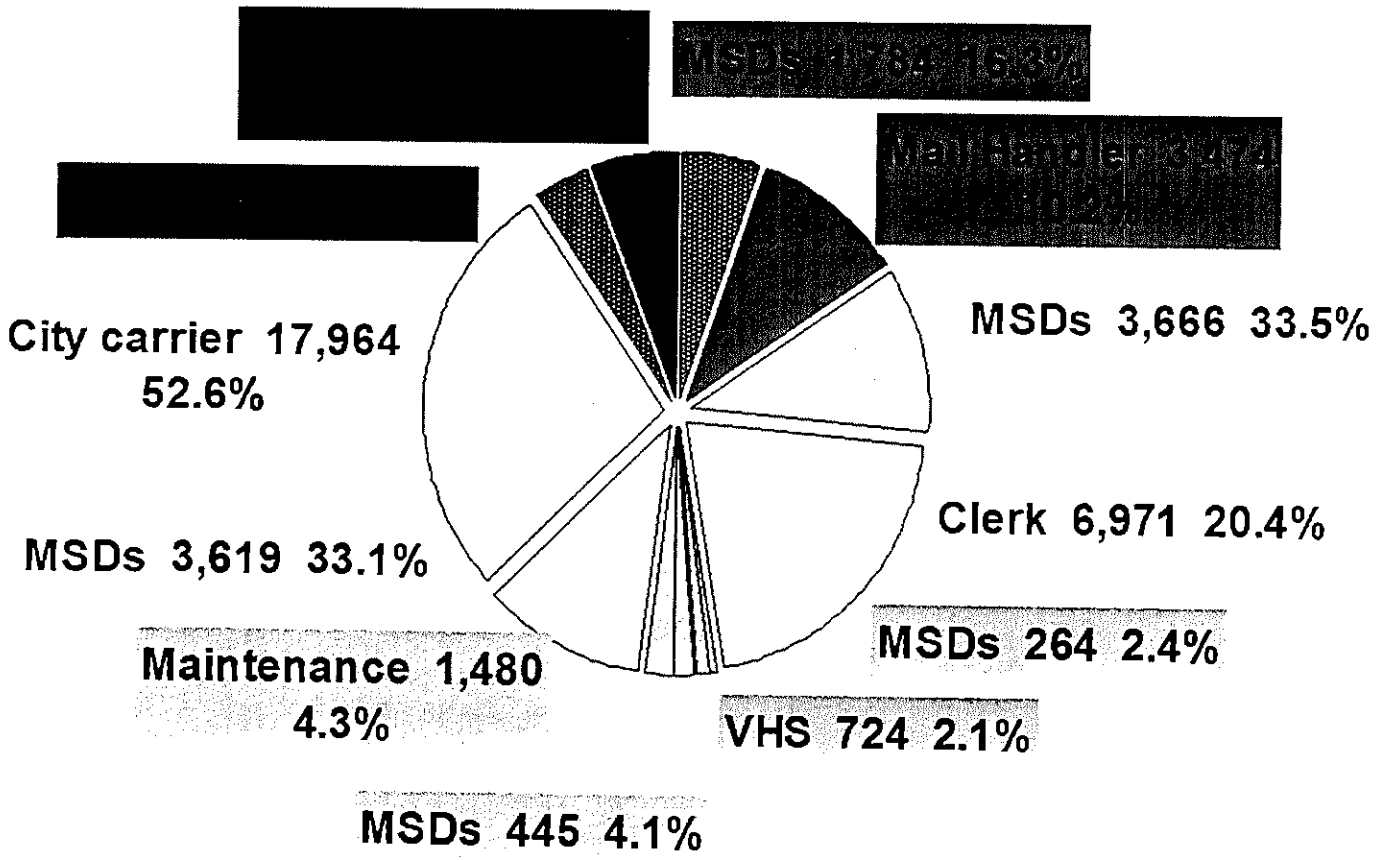
- NALC ERGONOMICS UPDATE
- MARCH 1, 2011

45

Ergonomics

2009 Total Recordable by Craft – 34,135

Total Number of MSD – 10,931 32.0%



Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

Ergonomics

FY 2009 RECORDABLE AND MSD

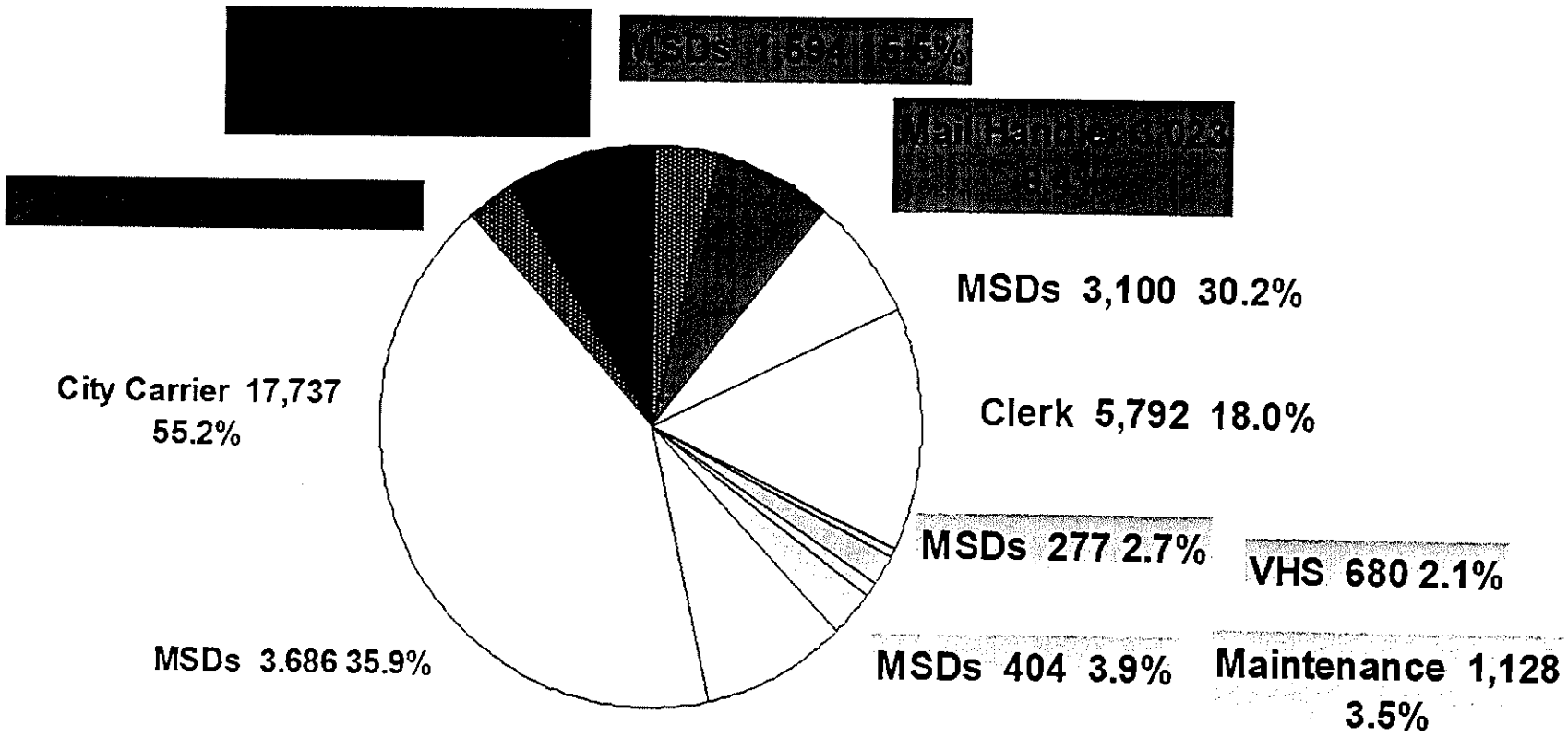
CRAFT	TOTAL OSHA I&I	MSD	MSD'S AS % OF OSHA I&I	% OF TOTAL MSD'S
RURAL	3522	1153	32.7%	10.5%
MAILHANDLER	3474	1784	51.3%	16.3%
CLERK	6971	3666	52.5%	33.5%
VEHICLE	724	264	36.4%	2.4%
MAINT	1480	445	30.1%	4.1%
CITY CARRIER	17964	3619	20.1%	33.1%
TOTAL	34135	10931	32.0%	100%

Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

Ergonomics

2010 Total Recordable by Craft –32,154

Total Number of MSD – 10,264 31.9%



Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

Ergonomics

FY 2010 RECORDABLE AND MSD

CRAFT	TOTAL OSHA I&I	MSD	MSD'S AS % OF OSHA I&I	% OF TOTAL MSD'S
RURAL	3794	1203	31.7%	11.7%
MAILHANDLER	3023	1594	52.7%	15.5%
CLERK	5792	3100	53.5%	30.2%
VEHICLE	680	277	40.7%	2.7%
MAINT	1128	404	35.8%	3.9%
CITY CARRIER	17737	3686	20.7%	35.9%
TOTAL	32154	10264	31.9%	100%

Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

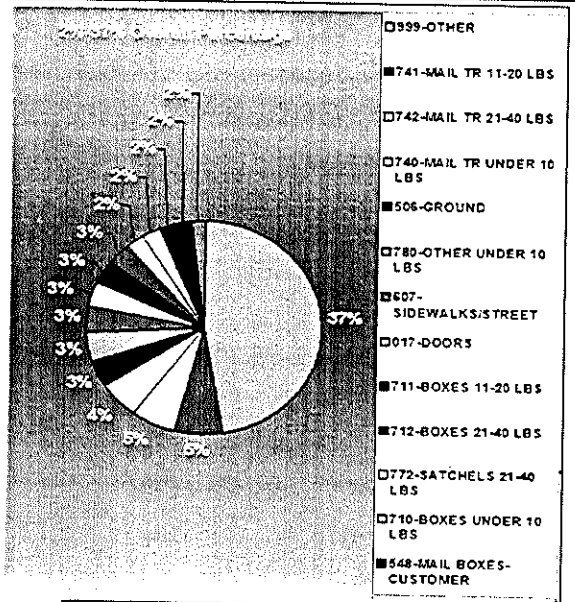
UNITED STATES POSTAL SERVICE

Ergonomics

NALC FY 2010 MSD RECORDABLES by ITEM

NALC FY10 MSD Recordable Totals by Item

43DesAct 241tem	134-FT CITY CARRIER 2010	334-PTR CITY CARRIER 2010	434-PTF CITY CARRIER 2010	634-CASUAL CITY CARRIER 2010	834-TRANSITIONAL CITY DELIVERY CARRIER 2010	Total 2010	Overall Total Percentage
999-OTHER	1,185	4	116	0	41	1,346	47%
741-MAIL TR 11-20 LBS	149	2	30	0	7	188	6%
742-MAIL TR 21-40 LBS	145	1	17	0	13	176	6%
740-MAIL TR UNDER 10 LBS	132	0	12	0	9	153	5%
506-GROUND	105	1	9	0	7	122	4%
780-OTHER UNDER 10 LBS	113	0	6	0	3	122	4%
607-SIDEWALKS/STREET	102		6	0	3	111	3%
017-DOORS	84	0	17	0	4	105	3%
711-BOXES 11-20 LBS	86	0	10	0	5	101	3%
712-BOXES 21-40 LBS	79	2	16	0	4	101	3%
772-SATCHELS 21-40 LBS	54		11	0	4	69	2%
710-BOXES UNDER 10 LBS	60	1	6	0	1	68	2%
548-MAIL BOXES-CUSTOMER	55		7		2	64	2%
781-OTHER 11-20 LBS	57	0	4	0	2	63	2%
049-OTHER CONTAINER	49	0	4	0	3	57	2%
439-CASES	48	0	6			54	2%
743-MAIL TR 41-70 LBS	36	0	7	0	1	44	1%
590-STEPS/STAIRS	40	0	2	0	1	43	1%
713-BOXES 41-70 LBS	31	1	5	0	3	40	1%
774-SATCHELS 71 LBS & UP	27		4		6	37	1%
012-DELIVERY TRAY	28		5		1	34	1%
771-SATCHELS 11-20 LBS	26		4	0	3	33	1%
481-DOORS	29	1	1		1	32	1%
782-OTHER 21-40 LBS	26	0	3		0	29	1%
045-LARGE HAMPERS W/WHLS	23	2	2	0	1	28	1%
043-LETTER TRAY TRANSPRT	21		3		3	27	1%
562-NEWSPAPERS-BUNDLED	19		5		2	26	1%
762-MAIL SCK 21-40 LBS	18		4		1	23	1%
744-MAIL TR 71 LBS & UP	18	1	1		1	21	1%
763-MAIL SCK 41-70 LBS	13		5		2	20	1%
783-OTHER 41-70 LBS	19	0	1		0	20	1%
027-DOOR/WINDOW HANDLES	17		0		2	19	1%
770-SATCHEL UNDER 10 LBS	15		3		0	18	1%
564-PAPER	15	0	0		1	16	1%
784-OTHER 71 LBS & UP	11	0	3		1	15	1%
046-SMALL HAMPERS W/WHLS	9	1	1		1	12	0%
Total	3,148	21	361	0	156	3,686	100%



999-OTHER	1,346
741-MAIL TR 11-20 LBS	188
742-MAIL TR 21-40 LBS	176
740-MAIL TR UNDER 10 LBS	153
506-GROUND	122
780-OTHER UNDER 10 LBS	122
607-SIDEWALKS/STREET	111
017-DOORS	105
711-BOXES 11-20 LBS	101
712-BOXES 21-40 LBS	101
772-SATCHELS 21-40 LBS	69
710-BOXES UNDER 10 LBS	68
548-MAIL BOXES-CUSTOMER	64
781-OTHER 11-20 LBS	63
049-OTHER CONTAINER	57
Subtotal of charted items	2,846
Percent of overall charted	77%
Grand Total	3,686
<2% not charted	23%

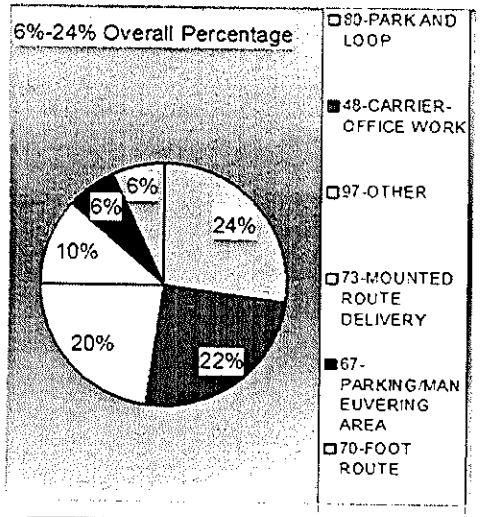
Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

Ergonomics

NALC FY 2010 MSD RECORDABLES by WORK LOCATION

NALC FY10 MSD Recordable Totals by Work Location

43DesAct 17WorkLoc	134-FT CITY CARRIER	334-PTR CITY CARRIER	434-PTF CITY CARRIER	634-CASUAL CITY CARRIER	834-TRANSITIONAL CITY DELIVERY CARRIER	Total	Overall Total Percentage
80-PARK AND LOOP	732		92	0	54	878	24%
48-CARRIER-OFFICE WORK	736	1	62	0	14	813	22%
97-OTHER	622	4	83	0	31	740	20%
73-MOUNTED ROUTE DELIVERY	329		27	0	10	366	10%
67-PARKING/MANEUVERING AREA	187	0	22	0	12	221	6%
70-FOOT ROUTE	185		25	0	11	221	6%
49-DOCK & PLATFORM	112	4	23	0	11	150	4%
56-OFFICE AREA	98		5	0	2	105	3%
74-COLLECTION	41	12	12	0	5	70	2%
68-AISLE/PASS	27		0		2	29	1%
72-PARCEL POST	26		2	0	1	29	1%
79-RELAY ROUTE	19		5	0	2	27	1%
Total	3,148	21	361	0	155	3,686	100%



80-PARK AND LOOP	878
48-CARRIER-OFFICE WORK	813
97-OTHER	740
73-MOUNTED ROUTE DELIVERY	366
67-PARKING/MANEUV	221
70-FOOT ROUTE	221
SubTotal	3,239
Grand Total	3,686
>6% not charted	88%

Source: EDW
Date: 02/15/11
Prepared by: ec & mp/ SEPM

U20

Ergonomics

CITY CARRIER FY07-10 OSHA MSD Totals

43DesAct	134-FT CITY CARRIER	334-PTR CITY CARRIER	434-PTF CITY CARRIER	634-CASUAL CITY CARRIER	834-TRANSITIONAL CITY DELIVERY CARRIER	Total
2010	3,148	21	361	0	155	3,686
2009	3,121	24	332	0	125	3,602
2008	3,501	20	482	1	103	4,107
2007	3,619	31	520	31	3	4,204

U21

Ergonomics

Common High Risk Work Methods or Hazards and Solutions

1. **Getting the mail off of the floor-** *Tables; tub racks & upside-down flat tubs*
2. **Reaching while casing mail-** *Shoulder Relief Platforms*
3. **Reaching into the rear of the vehicle-** *Reach poles for carrier vehicles or the LLV Stowage Systems*
4. **Reaching into hampers-** *Hamper tilters, inserts or False bottoms*
5. **Unloading pallets while distributing-** *Pallet lifters*
6. **Satchel weight and distribution-** *Double pouch satchel, ergo satchel straps and belts*

U22/45
Manny

LABOR RELATIONS

UNITED STATES POSTAL SERVICE

RECEIVED
NOV 14 2013
OFFICE OF THE PRESIDENT
NALC HQ
WASHINGTON, DC

November 13, 2013

Certified: 7013 1090 0002 4435 3941

Mr. Fredric V. Rolando
President
National Association of Letter Carriers
100 Indiana Avenue, N.W.
Washington, D.C. 20001-2144

Dear Fred:

The Postal Service proposes to revise Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*. This revision focuses on consideration of ergonomic safety by Area/Local Safety and Health Committees.

We have enclosed:

- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*
- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees* with changes identified
- A document containing explanation of changes
- An electronic copy of the proposed Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*

In accordance with Article 19 of the collective bargaining agreement, these revisions will go into effect no sooner than 60 days from the union's receipt of this notice.

Please contact Mera Cole at extension 4870 if you have any questions concerning this matter or would like to meet to discuss the proposed changes.

Sincerely,

Alan S. Moore
Manager
Labor Relations Policy and Programs

Enclosures

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-4101
WWW.USPS.COM

U23

Correspondence Detail

Run Date: 11/15/2013

Control #	Dated	Closed	Deadline	Appl	Subject	USPS #
003574	11/13/2013	/ /	01/02/2014	N	Handbook EL-809 Guidelines	

Assigned
Peralta, Manuel

Issue The Postal Service proposes to revise Handbook EL-809, Guidelines for Area/Local Joint Labor-Management Safety and Health Committees. This revision focuses on consideration of ergonomic safety by Area/Local

Action Safety and Health Committees.

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U24 /4 Manny

LABOR RELATIONS

UNITED STATES POSTAL SERVICE

RECEIVED
NOV 14 2013
OFFICE OF THE PRESIDENT
NALC HQ
WASHINGTON, DC

November 13, 2013

Certified: 7013 1090 0002 4435 3941

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President
National Association of Letter Carriers
100 Indiana Avenue, N.W.
Washington, D.C. 20001-2144

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Sincerely,

Alan S. Moore
Manager
Labor Relations Policy and Programs

Enclosures

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-4101
WWW.USPS.COM

CURRENT Handbook EL-809 – Guidelines for Area/Local Joint Labor-Management Safety and Health Committees	PROPOSED	PURPOSE OF CHANGE	ANTICIPATED IMPACT
A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions. **B. Distribution** **1. Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook. **2. Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *Material Distribution Center Supply Requisition.* **C. Comments** 1. Comments and questions about the content of this document can be submitted in writing to: SAFETY PERFORMANCE MANAGEMENT US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 9801 WASHINGTON DC 20260-4231 2. Comments and questions about the organization or editing of this document can be submitted in writing to: POLICIES AND PROCEDURES INFORMATION US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 5540 WASHINGTON DC 20260-5540 **D. Effective Date.** This handbook is effective upon receipt. *Suzanne F. Medvidovich* *Senior Vice President* Human Resources	**A. Explanation.** This issue of Handbook EL-809 obsoletes all previously published versions. **B. Distribution** **1. Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook. **2. Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *MDC Supply Requisition.* **C. Comments** 1. Comments and questions about the content of this document can be submitted in writing to: SAFETY AND HEALTH US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 9801 WASHINGTON DC 20260-4231 2. Comments and questions about the organization or editing of this document can be submitted in writing to: BRAND AND POLICY US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 4630 WASHINGTON DC 20260-5540 **D. Effective Date.** This handbook is effective upon receipt. *Jeffrey C. Williamson* *Executive Vice President* *Chief Human Resources Officer*	Update to reflect changes in Department name and titles.	None
II. Membership			
Area Safety Committee A joint labor-management safety and health committee will be established at the employer's area level. ▪ Representation on the committee shall include one person from the union and appropriate	*Area Safety Committee* A joint labor-management safety and health committee will be established at the employer's area level. ▪ Representation on the committee shall include one person from the union and appropriate		

U25

representatives from the Postal Service area office. ▪ The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management. ▪ The secretary of the committee will be ▪ designated by management. ▪ When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee.	representatives from the Postal Service area office. ▪ The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management. ▪ The secretary of the committee will be designated by management. ▪ When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee. ▪ **The headquarters Ergonomic Specialist assigned to the Area may attend meetings at the request of the committee to provide input on issues related to ergonomics.**	Include the availability of the Ergonomic Specialist to attend meetings if required.	None
V. Duties and Responsibilities of Committee Members			
A. All Local Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and thereby help to prevent accidents. 3. Review local safety and health rules and assist management with the enforcement of these rules. 4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent. 5. Determine program areas to receive increased emphasis and make recommendations regarding them. 6. Review employee safety and health suggestions. 7. Review safety-training records to determine if all employees are receiving appropriate training. 8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, and responses or corrective action taken. 9. Review Forms 1769, *Accident Report*, and statistics from the National Accident Reporting System and the	A. All Local Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and **ergonomics** and thereby help to prevent accidents. 3. Review local safety and health rules and assist management with the enforcement of these rules. 4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent. 5. Determine program areas to receive increased emphasis and make recommendations regarding them. 6. Review employee safety and health **and ergonomic** suggestions. 7. Review safety **and ergonomics** training records to determine if all employees are receiving appropriate training. 8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, and responses or corrective action taken.	Suggests including ergonomics as a permanent agenda item for each meeting to review ergonomic resources and provide possible solutions at their local sites.	Opportunity for reduction of MSD related injuries and illnesses to employees at their sites.

injury compensation program reporting system. 10. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. 11. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections. ▪ When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation. ▪ Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility. ▪ A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility. ▪ One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.	9. Review Forms 1769/**301** and statistics from the National Accident Reporting System and the injury compensation program reporting system. 10. Discuss all matters relating to employee safety, health **and ergonomics** , except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. **11. Assist in making recommendations for ergonomic improvements; Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.** **12**. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections. ▪ When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation. ▪ Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility. ▪ A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility. ▪ One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where	Current Number 11 is now Number 12 due to additional ergonomic information.	

	such a committee exists in the installation being inspected.		
B. All Area Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and thereby help to prevent accidents. 3. Determine program areas to receive increased emphasis and make recommendations regarding them. 4. Review Forms 1769, *Accident Report,* and statistics from the National Accident Reporting System and the injury compensation program reporting system. 5. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. C. Area/Local Committee Officers: 1. Chairperson: ▪ Arranges for meeting place. ▪ Sets times and dates for meetings. ▪ Notifies members of meetings. ▪ Receives agenda items from members. ▪ Arranges agenda and program. ▪ Arranges for seating for all members. ▪ Reviews previous minutes and other materials before meetings. ▪ Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee. ▪ Responds to members' requests for special meetings. 2. Area/Local Secretary: ▪ Prepares minutes of meetings. ▪ Distributes minutes. ▪ Reports on the status of recommendations made by the committee.	B. All Area Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety, health and **ergonomics** thereby help to prevent accidents. 3. Determine program areas to receive increased emphasis and make recommendations regarding them. 4. Review Forms 1769/**301** and statistics from the National Accident Reporting System and the injury compensation program reporting system. 5. Discuss all matters relating to employee safety, health, **and ergonomics** except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. 6. **To assist in making recommendations for ergonomic improvements, using available ergonomic resources.** C. Area/Local Committee Officers: 1. Chairperson: ▪ Arranges for meeting place. ▪ Sets times and dates for meetings. ▪ Notifies members of meetings. ▪ Receives agenda items from members. ▪ Arranges agenda and program. ▪ Arranges for seating for all members. ▪ Reviews previous minutes and other materials before meetings. ▪ Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee. ▪ Responds to members' requests for special meetings. 2. Area/Local Secretary: ▪ Prepares minutes of meetings.	Suggests including ergonomics as a permanent agenda item for each meeting to review available resources and recommend improvements for their Districts.	Provides Ergonomic awareness on activities at the Districts, and opportunity to provide possible solutions.

▪ Distributes agenda to members. ▪ May assume some of the chairperson's duties. D. Field Federal Safety and Health Councils: In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.	▪ Distributes minutes. ▪ Reports on the status of recommendations made by the committee. ▪ Distributes agenda to members. ▪ May assume some of the chairperson's duties. D. Field Federal Safety and Health Councils: In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay. .		
VII. Order of Business			
Local Committee			
A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time. B. *Roll call by the secretary.* Names of members and others present should be recorded. C. *Introduction of any visitors.* D. *Minutes of the previous meeting.* These should be read and any needed corrections made. E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration. F. *New business.* ▪ Review of safety accident reports, statistics, and accident reports. ▪ Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.* ▪ Review of employee safety suggestions. ▪ Review of safety rules, safety films, and safety training programs, etc. ▪ Review of progress of safety and health program, and special campaigns, etc. ▪ Discussion and resolution of any other items or problems relating to safety and health.	A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time. B. *Roll call by the secretary.* Names of members and others present should be recorded. C. *Introduction of any visitors.* D. *Minutes of the previous meeting.* These should be read and any needed corrections made. E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration. F. *New business.* ▪ Review of safety accident reports, statistics, and accident reports. ▪ Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.* ▪ Review of employee safety **<u>and ergonomic</u>** suggestions. ▪ Review of safety rules, safety films, and safety **<u>and ergonomics</u>** training programs, etc. ▪ Review of progress of safety and health program, and special campaigns, etc. ▪ Discussion and resolution of any other items or	Provides available ergonomic resources to the local committee.	Provides ergonomic awareness on available resources.

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G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc. H. *Adjournment.*	problems relating to safety and health. G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc. H. *Adjournment.*		
Area Committee			
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VIII. Suggested Format for Minutes of Meeting			
Agenda Items: Special items:			
(This will include safety education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)	(This will include safety **<u>and ergonomic</u>** education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)	Suggests including ergonomics as part of the meeting agenda.	Provides review of available ergonomic resources.

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UNITED STATES POSTAL SERVICE

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809 ~~April 2001~~ November, 2013
Transmittal Letter

A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions.

B. Distribution

1. Initial. Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. Additional Copies. Order additional copies from the Material Distribution Center using Form 7380, *MDC ~~Material Distribution Center~~ Supply Requisition.*

C. Comments

1. Comments and questions about the content of this document can be submitted in writing to:

SAFETY AND HEALTH ~~PERFORMANCE MANAGEMENT~~
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

~~POLICIES AND PROCEDURES INFORMATION~~ BRAND AND POLICY
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM ~~5640~~ 4630
WASHINGTON DC 20260-5540

D. Effective Date. This handbook is effective upon receipt.

~~Suzanne F. Medvidovich~~ Jeffrey C. Williamson
~~Senior Vice President~~ Executive Vice President
~~Human Resources~~ Chief Human Resources Officer

Introduction

This booklet is for all area/local joint labor-management safety and health committee members and is intended to provide guidance and information on your responsibilities as a committee member.

As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

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I. Safety Philosophy of the United States Postal Service

This is the safety philosophy of the Postal Service:

- All injuries can be prevented.
- Management, which includes all levels through the initial level supervisor, has the responsibility for preventing injuries.
- It is possible to safeguard against all operating exposures that may result in injuries.
- All employees must be trained to work safely and to understand that it is to their advantage, as well as the Postal Service's, to work safely, and that they have a definite responsibility to do so in order to avoid the pain and suffering caused by accidents.
- It is good business from the standpoint of both efficiency and economy to prevent personal injuries on the job and off the job.

The following are excerpts from the 1998 National Agreement Article on Safety and Health:

> *It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Unions will cooperate with and assist management to live up to this responsibility.*
>
> *The Employer and the Unions insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions.*

II. Membership

Area Safety Committee

A joint labor-management safety and health committee will be established at the employer's area level.

- Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.
- The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management.
- The secretary of the committee will be designated by management.

- When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee.
- The headquarters Ergonomic Specialist assigned to the Area may attend meetings at the request of the committee to provide input on issues related to ergonomics.

Local Safety Committee

A. A joint labor-management safety and health committee will be established at each postal installation that has 50 or more employees.

B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.

C. There shall be equal representation on the committee between the unions and management.

- Representation on the committee shall include one person from each of the unions at the installation. Appropriate officials shall represent management.
- The chairperson of the committee will be an operations direct report to the installation head designated by management.
- The secretary of the committee will be designated by management.
- When an installation has a safety officer (manager, specialist, technician) on the staff, that person shall be a member of the committee.
- When an installation has maintenance and/or environmental personnel (manager, supervisor, coordinator) on the staff, those persons shall be members of the committee.

III. Terms of Membership

With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Membership

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

A. All Local Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Review local safety and health rules and assist management with the enforcement of these rules.
4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
5. Determine program areas to receive increased emphasis and make recommendations regarding them.
6. Review employee safety, health and ergonomic suggestions.
7. Review safety and ergonomics training records to determine if all employees are receiving appropriate training.
8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, and responses or corrective action taken.
9. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
10. Discuss all matters relating to employee safety, health, and ergonomics except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
11. Assist in making recommendations for ergonomic improvements; Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.
12. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections.
    - When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation.

- Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
- A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
- One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Determine program areas to receive increased emphasis and make recommendations regarding them.
4. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
5. Discuss all matters relating to employee safety, health **and ergonomics**, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
6. **To assist in making recommendations for ergonomic improvements, using available ergonomic resources.**

C. Area/Local Committee Officers:

1. Chairperson:
   - Arranges for meeting place.
   - Sets times and dates for meetings.
   - Notifies members of meetings.
   - Receives agenda items from members.
   - Arranges agenda and program.
   - Arranges for seating for all members.
   - Reviews previous minutes and other materials before meetings.

- Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
- Responds to members' requests for special meetings.

2. Area/Local Secretary:
   - Prepares minutes of meetings.
   - Distributes minutes.
   - Reports on the status of recommendations made by the committee.
   - Distributes agenda to members.
   - May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.

B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.

C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.

D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
- Review of employee safety and ergonomic suggestions.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, and special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

Area Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

VIII. Suggested Format for Minutes of Meeting

Date: _____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety and ergonomic education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

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UNITED STATES POSTAL SERVICE.

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809

November 2013
Transmittal Letter

A. **Explanation.** This issue of Handbook EL-809 obsoletes all previously published versions.

B. **Distribution**

1. **Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. **Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *MDC Supply Requisition.*

C. **Comments**

1. Comments and questions about the content of this document can be submitted in writing to:

   SAFETY AND HEALTH
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 9801
   WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

   BRAND AND POLICY
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 4630
   WASHINGTON DC 20260-5540

D. **Effective Date.** This handbook is effective upon receipt.

Jeffrey C. Williamson
Executive Vice President
Chief Human Resources Officer

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Introduction

This booklet is for all area/local joint labor-management safety and health committee members and is intended to provide guidance and information on your responsibilities as a committee member.

As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

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I. Safety Philosophy of the United States Postal Service 1

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- A. All Local Safety and Health Committee Members 3
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- C. Area/Local Committee Officers 5
- D. Field Federal Safety and Health Councils 5

VI. Area/Local Committee Meetings 5

VII. Order of Business 6

VIII. Suggested Format for Minutes of Meeting 8

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I. Safety Philosophy of the United States Postal Service

This is the safety philosophy of the Postal Service:

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- All employees must be trained to work safely and to understand that it is to their advantage, as well as the Postal Service's, to work safely, and that they have a definite responsibility to do so in order to avoid the pain and suffering caused by accidents.
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> *The Employer and the Unions insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions.*

II. Membership

Area Safety Committee

- A joint labor-management safety and health committee will be established at the employer's area level.
  - Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.

- The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management.
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B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.

C. There shall be equal representation on the committee between the unions and management.

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- When an installation has maintenance personnel (manager, supervisor, or coordinator) on the staff, those persons shall be members of the committee.

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With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Members

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

A. All Local Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Review local safety and health rules and assist management with the enforcement of these rules.
4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
5. Determine program areas to receive increased emphasis and make recommendations regarding them.
6. Review employee safety, health and ergonomic suggestions.
7. Review safety and ergonomics training records to determine if all employees are receiving appropriate training.
8. Review PS Forms 1767, *Report of Hazard, Unsafe Condition, or Practice,* and responses or corrective action taken.
9. Review PS Forms 1769/301 and statistics from the National Accident Reporting System and the injury compensation program reporting system.

10. Discuss all matters relating to employee safety, health and ergonomics, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
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    - Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
    - A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
    - One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
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3. Determine program areas to receive increased emphasis and make recommendations regarding them.
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6. To assist in making recommendations for ergonomic improvements, using available ergonomic resources.

C. Area/Local Committee Officers:

1. Chairperson:
   - Arranges for meeting place.
   - Sets times and dates for meetings.
   - Notifies members of meetings.
   - Receives agenda items from members.
   - Arranges agenda and program.
   - Arranges for seating for all members.
   - Reviews previous minutes and other materials before meetings.
   - Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
   - Responds to members' requests for special meetings.
2. Area/Local Secretary:
   - Prepares minutes of meetings.
   - Distributes minutes.
   - Reports on the status of recommendations made by the committee.
   - Distributes agenda to members.
   - May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.

B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.

C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.

D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics.
- Review of PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
- Review of employee safety and ergonomic suggestions.
- Review of safety rules, safety films, and safety and ergonomics training programs, etc.
- Review of progress of safety and health program, and special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

Area Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

VIII. Suggested Format for Minutes of Meeting

Date:_____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code).

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety and ergonomics education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

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LABOR RELATIONS

UNITED STATES POSTAL SERVICE

RECEIVED
NOV 14 2013
OFFICE OF THE PRESIDENT
NALC HQ
WASHINGTON, DC

November 13, 2013

Certified: 7013 1090 0002 4435 3941

Mr. Fredric V. Rolando
President
National Association of Letter Carriers
100 Indiana Avenue, N.W.
Washington, D.C. 20001-2144

Dear Fred:

The Postal Service proposes to revise Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees.* This revision focuses on consideration of ergonomic safety by Area/Local Safety and Health Committees.

We have enclosed:

- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*
- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees* with changes identified
- A document containing explanation of changes
- An electronic copy of the proposed Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*

In accordance with Article 19 of the collective bargaining agreement, these revisions will go into effect no sooner than 60 days from the union's receipt of this notice.

Please contact Mera Cole at extension 4870 if you have any questions concerning this matter or would like to meet to discuss the proposed changes.

Sincerely,

Alan S. Moore
Manager
Labor Relations Policy and Programs

Enclosures

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-4101
WWW.USPS.COM

UNITED STATES POSTAL SERVICE

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809 ~~April 2001~~ November, 2013
Transmittal Letter

A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions.

B. Distribution

1. Initial. Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. Additional Copies. Order additional copies from the Material Distribution Center using Form 7380, *MDC ~~Material Distribution Center~~ Supply Requisition.*

C. Comments

1. Comments and questions about the content of this document can be submitted in writing to:

SAFETY AND HEALTH ~~PERFORMANCE MANAGEMENT~~
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

~~POLICIES AND PROCEDURES INFORMATION~~ BRAND AND POLICY
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 6640 4630
WASHINGTON DC 20260-5540

D. Effective Date. This handbook is effective upon receipt.

~~Suzanne F. Medvidovich~~ Jeffrey C. Williamson
~~Senior Vice President~~—Executive Vice President
~~Human Resources~~——Chief Human Resources Officer

V55

Introduction

This booklet is for all area/local joint labor-management safety and health committee members and is intended to provide guidance and information on your responsibilities as a committee member.

As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

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I. Safety Philosophy of the United States Postal Service

This is the safety philosophy of the Postal Service:

- All injuries can be prevented.
- Management, which includes all levels through the initial level supervisor, has the responsibility for preventing injuries.
- It is possible to safeguard against all operating exposures that may result in injuries.
- All employees must be trained to work safely and to understand that it is to their advantage, as well as the Postal Service's, to work safely, and that they have a definite responsibility to do so in order to avoid the pain and suffering caused by accidents.
- It is good business from the standpoint of both efficiency and economy to prevent personal injuries on the job and off the job.

The following are excerpts from the 1998 National Agreement Article on Safety and Health:

> *It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Unions will cooperate with and assist management to live up to this responsibility.*
>
> *The Employer and the Unions insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions.*

II. Membership

Area Safety Committee

A joint labor-management safety and health committee will be established at the employer's area level.

- Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.
- The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management.
- The secretary of the committee will be designated by management.

- When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee.
- The headquarters Ergonomic Specialist assigned to the Area may attend meetings at the request of the committee to provide input on issues related to ergonomics.

Local Safety Committee

A. A joint labor-management safety and health committee will be established at each postal installation that has 50 or more employees.

B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.

C. There shall be equal representation on the committee between the unions and management.

- Representation on the committee shall include one person from each of the unions at the installation. Appropriate officials shall represent management.
- The chairperson of the committee will be an operations direct report to the installation head designated by management.
- The secretary of the committee will be designated by management.
- When an installation has a safety officer (manager, specialist, technician) on the staff, that person shall be a member of the committee.
- When an installation has maintenance ~~and/or environmental~~ personnel (manager, supervisor, coordinator) on the staff, those persons shall be members of the committee.

III. Terms of Membership

With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Membership

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

A. All Local Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Review local safety and health rules and assist management with the enforcement of these rules.
4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
5. Determine program areas to receive increased emphasis and make recommendations regarding them.
6. Review employee safety, health and ergonomic suggestions.
7. Review safety and ergonomics training records to determine if all employees are receiving appropriate training.
8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice,* and responses or corrective action taken.
9. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
10. Discuss all matters relating to employee safety, health, and ergonomics except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
11. **Assist in making recommendations for ergonomic improvements; Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.**
12. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections.
    - When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation.

- Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
- A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
- One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Determine program areas to receive increased emphasis and make recommendations regarding them.
4. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
5. Discuss all matters relating to employee safety, health **and ergonomics**, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
6. **To assist in making recommendations for ergonomic improvements, using available ergonomic resources.**

C. Area/Local Committee Officers:

1. Chairperson:
   - Arranges for meeting place.
   - Sets times and dates for meetings.
   - Notifies members of meetings.
   - Receives agenda items from members.
   - Arranges agenda and program.
   - Arranges for seating for all members.
   - Reviews previous minutes and other materials before meetings.

- Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
- Responds to members' requests for special meetings.

2. Area/Local Secretary:
   - Prepares minutes of meetings.
   - Distributes minutes.
   - Reports on the status of recommendations made by the committee.
   - Distributes agenda to members.
   - May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.

B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.

C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.

D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
- Review of employee safety and ergonomic suggestions.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, and special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

Area Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

VIII. Suggested Format for Minutes of Meeting

Date: _____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety and ergonomic education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

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UNITED STATES POSTAL SERVICE.

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809

November 2013
Transmittal Letter

A. **Explanation.** This issue of Handbook EL-809 obsoletes all previously published versions.

B. **Distribution**

1. **Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. **Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *MDC Supply Requisition.*

C. **Comments**

1. Comments and questions about the content of this document can be submitted in writing to:

   SAFETY AND HEALTH
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 9801
   WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

   BRAND AND POLICY
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 4630
   WASHINGTON DC 20260-5540

D. **Effective Date.** This handbook is effective upon receipt.

Jeffrey C. Williamson
Executive Vice President
Chief Human Resources Officer

U66 Manny

LABOR RELATIONS

UNITED STATES POSTAL SERVICE

RECEIVED
NOV 14 2013
OFFICE OF THE PRESIDENT
NALC HQ
WASHINGTON, DC

November 13, 2013

Certified: 7013 1090 0002 4435 3941

Mr. Fredric V. Rolando
President
National Association of Letter Carriers
100 Indiana Avenue, N.W.
Washington, D.C. 20001-2144

Dear Fred:

The Postal Service proposes to revise Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*. This revision focuses on consideration of ergonomic safety by Area/Local Safety and Health Committees.

We have enclosed:

- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees*
- A final draft copy of Handbook EL-809, *Guidelines for Area/Local Joint Labor-Management Safety and Health Committees* with changes identified
- A document containing explanation of changes
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In accordance with Article 19 of the collective bargaining agreement, these revisions will go into effect no sooner than 60 days from the union's receipt of this notice.

Please contact Mera Cole at extension 4870 if you have any questions concerning this matter or would like to meet to discuss the proposed changes.

Sincerely,

Alan S. Moore
Manager
Labor Relations Policy and Programs

Enclosures

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-4101
WWW.USPS.COM

CURRENT Handbook EL-809 – Guidelines for Area/Local Joint Labor-Management Safety and Health Committees	PROPOSED	PURPOSE OF CHANGE	ANTICIPATED IMPACT
A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions. **B. Distribution** **1. Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook. **2. Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *Material Distribution Center Supply Requisition.* **C. Comments** 1. Comments and questions about the content of this document can be submitted in writing to: SAFETY PERFORMANCE MANAGEMENT US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 9801 WASHINGTON DC 20260-4231 2. Comments and questions about the organization or editing of this document can be submitted in writing to: POLICIES AND PROCEDURES INFORMATION US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 5540 WASHINGTON DC 20260-5540 **D. Effective Date.** This handbook is effective upon receipt. *Suzanne F. Medvidovich* *Senior Vice President* Human Resources	**A. Explanation.** This issue of Handbook EL-809 obsoletes all previously published versions. **B. Distribution** **1. Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook. **2. Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *MDC Supply Requisition.* *C.* **Comments** 1. Comments and questions about the content of this document can be submitted in writing to: SAFETY AND HEALTH US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 9801 WASHINGTON DC 20260-4231 2. Comments and questions about the organization or editing of this document can be submitted in writing to: BRAND AND POLICY US POSTAL SERVICE 475 L'ENFANT PLAZA SW RM 4630 WASHINGTON DC 20260-5540 D. **Effective Date.** This handbook is effective upon receipt. *Jeffrey C. Williamson* *Executive Vice President* *Chief Human Resources Officer*	Update to reflect changes in Department name and titles.	None
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Area Safety Committee A joint labor-management safety and health committee will be established at the employer's area level. ▪ Representation on the committee shall include one person from the union and appropriate	***Area Safety Committee*** A joint labor-management safety and health committee will be established at the employer's area level. ▪ Representation on the committee shall include one person from the union and appropriate		

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V. Duties and Responsibilities of Committee Members			
A. All Local Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and thereby help to prevent accidents. 3. Review local safety and health rules and assist management with the enforcement of these rules. 4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent. 5. Determine program areas to receive increased emphasis and make recommendations regarding them. 6. Review employee safety and health suggestions. 7. Review safety-training records to determine if all employees are receiving appropriate training. 8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice,* and responses or corrective action taken. 9. Review Forms 1769, *Accident Report,* and statistics from the National Accident Reporting System and the	A. All Local Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and **ergonomics** and thereby help to prevent accidents. 3. Review local safety and health rules and assist management with the enforcement of these rules. 4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent. 5. Determine program areas to receive increased emphasis and make recommendations regarding them. 6. Review employee safety and health **and ergonomic** suggestions. 7. Review safety **and ergonomics** training records to determine if all employees are receiving appropriate training. 8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice,* and responses or corrective action taken.	Suggests including ergonomics as a permanent agenda item for each meeting to review ergonomic resources and provide possible solutions at their local sites.	Opportunity for reduction of MSD related injuries and illnesses to employees at their sites.

injury compensation program reporting system. 10. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. 11. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections. ▪ When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation. ▪ Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility. ▪ A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility. ▪ One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.	9. Review Forms 1769/**301** and statistics from the National Accident Reporting System and the injury compensation program reporting system. 10. Discuss all matters relating to employee safety, health **and ergonomics** , except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. **11. Assist in making recommendations for ergonomic improvements; Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.** **12**. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections. ▪ When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation. ▪ Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility. ▪ A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility. ▪ One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where	Current Number 11 is now Number 12 due to additional ergonomic information.	

	such a committee exists in the installation being inspected.		
B. All Area Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety and health and thereby help to prevent accidents. 3. Determine program areas to receive increased emphasis and make recommendations regarding them. 4. Review Forms 1769, *Accident Report,* and statistics from the National Accident Reporting System and the injury compensation program reporting system. 5. Discuss all matters relating to employee safety and health, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. C. Area/Local Committee Officers: 1. Chairperson: ▪ Arranges for meeting place. ▪ Sets times and dates for meetings. ▪ Notifies members of meetings. ▪ Receives agenda items from members. ▪ Arranges agenda and program. ▪ Arranges for seating for all members. ▪ Reviews previous minutes and other materials before meetings. ▪ Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee. ▪ Responds to members' requests for special meetings. 2. Area/Local Secretary: ▪ Prepares minutes of meetings. ▪ Distributes minutes. ▪ Reports on the status of recommendations made by the committee.	B. All Area Safety and Health Committee Members: 1. Attend all scheduled meetings. 2. Create and maintain an interest in safety, health and **ergonomics** thereby help to prevent accidents. 3. Determine program areas to receive increased emphasis and make recommendations regarding them. 4. Review Forms 1769/**301** and statistics from the National Accident Reporting System and the injury compensation program reporting system. 5. Discuss all matters relating to employee safety, health, **and ergonomics** except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head. 6. **To assist in making recommendations for ergonomic improvements, using available ergonomic resources.** C. Area/Local Committee Officers: 1. Chairperson: ▪ Arranges for meeting place. ▪ Sets times and dates for meetings. ▪ Notifies members of meetings. ▪ Receives agenda items from members. ▪ Arranges agenda and program. ▪ Arranges for seating for all members. ▪ Reviews previous minutes and other materials before meetings. ▪ Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee. ▪ Responds to members' requests for special meetings. 2. Area/Local Secretary: ▪ Prepares minutes of meetings.	Suggests including ergonomics as a permanent agenda item for each meeting to review available resources and recommend improvements for their Districts.	Provides Ergonomic awareness on activities at the Districts, and opportunity to provide possible solutions.

▪ Distributes agenda to members. ▪ May assume some of the chairperson's duties. D. Field Federal Safety and Health Councils: In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.	▪ Distributes minutes. ▪ Reports on the status of recommendations made by the committee. ▪ Distributes agenda to members. ▪ May assume some of the chairperson's duties. D. Field Federal Safety and Health Councils: In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay. .		
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Local Committee			
A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time. B. *Roll call by the secretary.* Names of members and others present should be recorded. C. *Introduction of any visitors.* D. *Minutes of the previous meeting.* These should be read and any needed corrections made. E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration. F. *New business.* ▪ Review of safety accident reports, statistics, and accident reports. ▪ Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.* ▪ Review of employee safety suggestions. ▪ Review of safety rules, safety films, and safety training programs, etc. ▪ Review of progress of safety and health program, and special campaigns, etc. ▪ Discussion and resolution of any other items or problems relating to safety and health.	A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time. B. *Roll call by the secretary.* Names of members and others present should be recorded. C. *Introduction of any visitors.* D. *Minutes of the previous meeting.* These should be read and any needed corrections made. E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration. F. *New business.* ▪ Review of safety accident reports, statistics, and accident reports. ▪ Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.* ▪ Review of employee safety **and ergonomic** suggestions. ▪ Review of safety rules, safety films, and safety **and ergonomics** training programs, etc. ▪ Review of progress of safety and health program, and special campaigns, etc. ▪ Discussion and resolution of any other items or	Provides available ergonomic resources to the local committee.	Provides ergonomic awareness on available resources.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc. H. *Adjournment.*	problems relating to safety and health. G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc. H. *Adjournment.*		
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VIII. Suggested Format for Minutes of Meeting			
Agenda Items: Special items:			
(This will include safety education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)	(This will include safety **<u>and ergonomic</u>** education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)	Suggests including ergonomics as part of the meeting agenda.	Provides review of available ergonomic resources.

UNITED STATES POSTAL SERVICE

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809 ~~April 2001~~ November, 2013
Transmittal Letter

A. Explanation. This issue of Handbook EL-809 obsoletes all previously published versions.

B. Distribution

1. Initial. Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. Additional Copies. Order additional copies from the Material Distribution Center using Form 7380, *MDC ~~Material Distribution Center~~ Supply Requisition.*

C. Comments

1. Comments and questions about the content of this document can be submitted in writing to:

SAFETY AND HEALTH ~~PERFORMANCE MANAGEMENT~~
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM 9801
WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

~~POLICIES AND PROCEDURES INFORMATION~~ BRAND AND POLICY
US POSTAL SERVICE
475 L'ENFANT PLAZA SW RM ~~5640~~ 4630
WASHINGTON DC 20260-5540

D. Effective Date. This handbook is effective upon receipt.

~~Suzanne F. Medvidovich~~ Jeffrey C. Williamson
~~Senior Vice President~~ — Executive Vice President
~~Human Resources~~ — Chief Human Resources Officer

Introduction

This booklet is for all area/local joint labor-management safety and health committee members and is intended to provide guidance and information on your responsibilities as a committee member.

As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

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I. Safety Philosophy of the United States Postal Service

This is the safety philosophy of the Postal Service:

- All injuries can be prevented.
- Management, which includes all levels through the initial level supervisor, has the responsibility for preventing injuries.
- It is possible to safeguard against all operating exposures that may result in injuries.
- All employees must be trained to work safely and to understand that it is to their advantage, as well as the Postal Service's, to work safely, and that they have a definite responsibility to do so in order to avoid the pain and suffering caused by accidents.
- It is good business from the standpoint of both efficiency and economy to prevent personal injuries on the job and off the job.

The following are excerpts from the 1998 National Agreement Article on Safety and Health:

> *It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force. The Unions will cooperate with and assist management to live up to this responsibility.*
>
> *The Employer and the Unions insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions.*

II. Membership

Area Safety Committee

A joint labor-management safety and health committee will be established at the employer's area level.

- Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.
- The chairperson of the committee will be an operations direct report to the vice president, Area Operations, designated by management.
- The secretary of the committee will be designated by management.

- When an area has safety, maintenance, and/or environmental personnel (analyst, manager, specialist, or coordinator) on the staff, those persons shall be members of the committee.
- **The headquarters Ergonomic Specialist assigned to the Area may attend meetings at the request of the committee to provide input on issues related to ergonomics.**

Local Safety Committee

A. A joint labor-management safety and health committee will be established at each postal installation that has 50 or more employees.

B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.

C. There shall be equal representation on the committee between the unions and management.

- Representation on the committee shall include one person from each of the unions at the installation. Appropriate officials shall represent management.
- The chairperson of the committee will be an operations direct report to the installation head designated by management.
- The secretary of the committee will be designated by management.
- When an installation has a safety officer (manager, specialist, technician) on the staff, that person shall be a member of the committee.
- When an installation has maintenance ~~and/or environmental~~ personnel (manager, supervisor, coordinator) on the staff, those persons shall be members of the committee.

III. Terms of Membership

With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Membership

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

A. All Local Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Review local safety and health rules and assist management with the enforcement of these rules.
4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
5. Determine program areas to receive increased emphasis and make recommendations regarding them.
6. Review employee safety, health and ergonomic suggestions.
7. Review safety and ergonomics training records to determine if all employees are receiving appropriate training.
8. Review Forms 1767, *Report of Hazard, Unsafe Condition, or Practice*, and responses or corrective action taken.
9. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
10. Discuss all matters relating to employee safety, health, and ergonomics except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
11. **Assist in making recommendations for ergonomic improvements; Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.**
12. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections.
    - When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation.

- Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
- A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
- One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Determine program areas to receive increased emphasis and make recommendations regarding them.
4. Review Forms 1769/301~~, *Accident Report*~~, and statistics from the National Accident Reporting System and the injury compensation program reporting system.
5. Discuss all matters relating to employee safety, health **and ergonomics**, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
6. **To assist in making recommendations for ergonomic improvements, using available ergonomic resources.**

C. Area/Local Committee Officers:

1. Chairperson:
   - Arranges for meeting place.
   - Sets times and dates for meetings.
   - Notifies members of meetings.
   - Receives agenda items from members.
   - Arranges agenda and program.
   - Arranges for seating for all members.
   - Reviews previous minutes and other materials before meetings.

- Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
- Responds to members' requests for special meetings.

2. Area/Local Secretary:
   - Prepares minutes of meetings.
   - Distributes minutes.
   - Reports on the status of recommendations made by the committee.
   - Distributes agenda to members.
   - May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.

B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.

C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.

D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
- Review of employee safety and ergonomic suggestions.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, and special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

Area Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics, ~~and accident reports~~.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

VIII. Suggested Format for Minutes of Meeting

Date: _____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety and ergonomic education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

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UNITED STATES
POSTAL SERVICE®

Guidelines for Area/Local Joint Labor-Management Safety and Health Committees

Handbook EL-809

November 2013
Transmittal Letter

A. **Explanation.** This issue of Handbook EL-809 obsoletes all previously published versions.

B. **Distribution**

1. **Initial.** Handbook EL-809 is distributed to all postal facilities directly involved in implementation and/or enforcement of the policies and procedures described in this handbook.

2. **Additional Copies.** Order additional copies from the Material Distribution Center using Form 7380, *MDC Supply Requisition.*

C. **Comments**

1. Comments and questions about the content of this document can be submitted in writing to:

   SAFETY AND HEALTH
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 9801
   WASHINGTON DC 20260-4231

2. Comments and questions about the organization or editing of this document can be submitted in writing to:

   BRAND AND POLICY
   US POSTAL SERVICE
   475 L'ENFANT PLAZA SW RM 4630
   WASHINGTON DC 20260-5540

D. **Effective Date.** This handbook is effective upon receipt.

Jeffrey C. Williamson
Executive Vice President
Chief Human Resources Officer

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Introduction

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As an individual serving on the safety and health committee, you must have a personal commitment to make accident prevention a part of your daily work. You can demonstrate your commitment through leadership and by setting a personal example by working safely and observing safe practices. Safety must become your way of life, both on and off the job. Safety never just happens. If a workplace is safe, it is because somebody is working to make it safe. As a member of the safety and health committee, you are playing a major role in making your workplace safe for all employees.

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- B. All Area Safety and Health Committee Members 4
- C. Area/Local Committee Officers 5
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- Representation on the committee shall include one person from the union and appropriate representatives from the Postal Service area office.

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B. Such a committee may be established upon the request of the installation head at installations having fewer than 50 employees.

C. There shall be equal representation on the committee between the unions and management.

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- When an installation has maintenance personnel (manager, supervisor, or coordinator) on the staff, those persons shall be members of the committee.

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With the exception of the chairperson, the secretary, and the safety officer, committee members shall serve three-year terms. Union representatives will, at the discretion of their unions, be eligible to succeed themselves.

IV. Orientation of Area/Local Committee Members

All committee members will receive formal orientation and training on the duties and responsibilities of committee members, on the basic elements of the safety and health programs, on identification of hazards and unsafe conditions, and on reports and statistics reviewed and analyzed by the committee.

V. Duties and Responsibilities of Committee Members

A. All Local Safety and Health Committee Members:

1. Attend all scheduled meetings.
2. Create and maintain an interest in safety, health and ergonomics and thereby help to prevent accidents.
3. Review local safety and health rules and assist management with the enforcement of these rules.
4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head. Membership on a safety and health committee does not entitle the members to have access to individual employee medical records without the employee's consent.
5. Determine program areas to receive increased emphasis and make recommendations regarding them.
6. Review employee safety, health and ergonomic suggestions.
7. Review safety and ergonomics training records to determine if all employees are receiving appropriate training.
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9. Review PS Forms 1769/301 and statistics from the National Accident Reporting System and the injury compensation program reporting system.

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10. Discuss all matters relating to employee safety, health and ergonomics, except for individual grievances (unless permitted by national agreement), and make recommendations for resolution or improvement to the installation head.
11. Assist in making recommendations for ergonomic improvements. Committee members will use ergonomic resources accessible to management representatives including checklists, assessments, and ergonomic task analysis tools.
12. Participate in on-the-spot inspections of troublesome areas when authorized by the chairperson. Committee members will be on official time while making such inspections.
    - When an investigation board is appointed by a performance cluster manager to investigate a fatal or serious industrial noncriminal accident, the appropriate union at the installation will be advised promptly. When requested by the union, a representative from the committee will be permitted to accompany the board in its investigation.
    - Any union representative on the committee may participate in the semiannual inspections conducted by safety personnel in the main facility of each performance cluster and bulk mail center (BMC), provided their union represents employees at that facility.
    - A union representative from the committee may participate in the inspection of any main facility, Post Office, BMC, station, branch, or other installation that has 100 or more man-years of employment in the regular workforce, provided that his or her union represents employees at that facility and that his or her duty station is at that facility.
    - One union representative from the committee, selected on a rotating basis by the unions, may participate in the annual inspection of each installation with fewer than 100 man-years of employment in the regular workforce, where such a committee exists in the installation being inspected.

B. All Area Safety and Health Committee Members:

1. Attend all scheduled meetings.
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6. To assist in making recommendations for ergonomic improvements, using available ergonomic resources.

C. Area/Local Committee Officers:

1. Chairperson:
   - Arranges for meeting place.
   - Sets times and dates for meetings.
   - Notifies members of meetings.
   - Receives agenda items from members.
   - Arranges agenda and program.
   - Arranges for seating for all members.
   - Reviews previous minutes and other materials before meetings.
   - Coordinates gathering of all appropriate management reports, data, and information to be reviewed by the committee.
   - Responds to members' requests for special meetings.
2. Area/Local Secretary:
   - Prepares minutes of meetings.
   - Distributes minutes.
   - Reports on the status of recommendations made by the committee.
   - Distributes agenda to members.
   - May assume some of the chairperson's duties.

D. Field Federal Safety and Health Councils:

In areas where Field Federal Safety and Health Councils exist, one representative of the unions who is on the local safety and health committee will be permitted to become a member of such a council and attend its meetings. This employee will be excused from regularly assigned duties without loss of pay.

VI. Area/Local Committee Meetings

A. The committee shall meet at least quarterly. In addition, meetings may be held at any other time at the request of a committee member to discuss important problems or items. Such a request must be approved by the chairperson, but the request cannot be unreasonably denied.

B. Agenda items must be submitted to the committee's chairperson at least three days before a meeting.

C. Individual grievances will not be discussed during local committee meetings unless provided for in the national agreements.

D. Meetings should be conducted according to the generally accepted rules of order, but formality should not be allowed to overwhelm the meeting or to inhibit free discussion.

VII. Order of Business

Local Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics.
- Review of PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice.*
- Review of employee safety and ergonomic suggestions.
- Review of safety rules, safety films, and safety and ergonomics training programs, etc.
- Review of progress of safety and health program, and special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

Area Committee

A. *Call to order.* The chairperson should call the meeting to order promptly at the designated time.

B. *Roll call by the secretary.* Names of members and others present should be recorded.

C. *Introduction of any visitors.*

D. *Minutes of the previous meeting.* These should be read and any needed corrections made.

E. *Unfinished business.* All matters on which no definite decisions have been made are brought up for reconsideration.

F. *New business.*

- Review of safety accident reports and statistics.
- Review of safety rules, safety films, safety and ergonomics training programs, etc.
- Review of progress of safety and health program, special campaigns, etc.
- Discussion and resolution of any other items or problems relating to safety and health.

G. *Safety education.* This should be made a part of every meeting. A presentation can be made by a committee member, by an outside expert, or by the local safety officer, etc.

H. *Adjournment.*

U94

VIII. Suggested Format for Minutes of Meeting

Date:_____

Subject: Safety and Health Committee [Date of Report] Minutes of Meeting

From: Chairperson, Safety and Health Committee (office, state, and ZIP Code)

To: Postmaster (or installation head) (office, state, and ZIP Code)

Meeting convened at:	(time)	(location)
In attendance:	(name)	Chairperson
	(name)	Secretary
	(name)	Title
	(name)	Title
Not in attendance:	(name)	Title
	(name)	Title
Agenda Items:	Unfinished business:	(Subject, action taken, etc.)
	New business:	(Subject, action taken, etc.)
	Problem areas which should receive increased emphasis:	(Brief report and recommendations, if any)
	Special items:	(This will include safety and ergonomics education presentations, results of on-the-spot inspections of troublesome areas with recommendations and action taken.)
	Brief report, if any	
Meeting adjourned at:	(time)	

Signed: _____ **Chairperson**

_____ **Secretary**

Note: Copies of the minutes should be provided to the local president of each union and posted on employee bulletin boards.

U95

Job Safety

Analysis (Generic)

Title: NALC Good Idea - Elevating Mail from the Floor

*Note: This document verifies the hazard assessment as required by 29 CFR 1910.132(d)(2).

Location (e.g., Station, Branch, Plant)
Name:
Street Address 1:
City:
State:
Zip Code:
Area:
PC:

Job Description: Removing Mail from the Floor (Reducing Repetitive Bending)

Location Description: Workroom Floor – Carrier Case

Titles of Employees Performing the Job: Clerks and Carriers

Occupational Codes:

Author	Local Reviewer	Local/Area/National Reviewer
Name: NALC Joint Safety Task Force	Name:	Name:
Title: Members	Date:	Date:
Date: 2/25/2008	Approval:	Approval:

Sequence of Basic Steps	Potential Hazards and Effects	Safe Work Practices	Required PPE*
1. Place mail on an elevated work surface	1.1. Hazard: Placing load onto a low level surface Effect: The lifting hazards are repeated for the next lifter. Back, shoulder, and knee strain while lowering the load to the floor.	1.1. Invert plastic milk crates or tubs on the floor (or other appropriate alternatives) to elevate the mail and reduce repetitive bending/ reaching.	Appropriate Footwear (all sections).
	1.2. Hazard: Mail falling to the floor Effect: Struck by, or slip/ trip/falling hazard	1.2. Position mail so that it rests securely on the platform	
2. Removing mail from an elevated surface.	2.1. Hazard: Improper lifting techniques Effect: Strain when handling mail	22.1. Use safe lifting techniques	

Ergonomic Risk Assessment: **Health Risk Assessment Code:** **Safety Risk Assessment:**

Qualitative/Quantitative Exposure Assessment Data **Policy Documents** **Supporting Postal Service**

Supporting Safety Talks **Supporting JSAs**

Required Training

Safe Lifting

Course No. **Course Title:**

USPS/NALC Accident Control Team June 6, 2014

Topic:

Accident Root Causes

Accident Causes

H.W. Heinrich* stated that the occurrence of an injury invariably results from a completed sequence of factors, the last one of these being the injury itself. The accident that caused the injury is in turn invariably caused or permitted directly by the unsafe act of a person and/or mechanical or physical hazard. Heinrich's sequence of accident factors is represented by five dominoes:

- Ancestry.
- Fault of a person (inherent or intentional fault).
- Unsafe act/condition.
- Accident.
- Injury.

The objective, of course, is to remove one of the dominoes that would stop the "falling" sequence leading to an accident. Like electricity following the path of least resistance, it was quickly recognized that the easiest factor to remove was the unsafe act or condition. A practical approach to accident causation was born and, by the nature of its simplicity, is still being applied today.

** Heinrich, H.W., D. Petersen, N. Roos, Industrial Accident Prevention: A Safety Management Approach, 5th ed., New York, McGraw-Hill, 1980.*

Common Causes of Accidents

Accidents may be caused by people, equipment, materials, procedures and the environment. Human factors include individual differences, motivation, frustration, conflict, attitudes, values, and learning. Equipment factors include arrangement, operation, guards, maintenance, design, selection, and personal protective equipment. Material factors include strength, arrangement, components, weight, size, handling requirements, selection, and storage. Written procedures for performing specific tasks, operating equipment, etc. may be inadequate, complex, or missing. Environmental factors include lighting, temperature, noise, contaminant, housekeeping, maintenance, and workplace design.

Immediate causes of accidents are also known as unsafe acts, unsafe conditions, secondary causes or contributory causes. Immediate causes are deviations of accepted standards or practices. They are the symptoms of root causes. One way to think of this is to recall the saying about treating

the symptom versus treating disease. Focusing attention only on immediate causes is like treating symptoms. That is, they may be worthwhile, but they will not address the major problem. Immediate causes are classified into two groups: unsafe acts and unsafe conditions.

Unsafe acts:

- Using defective equipment.
- Using equipment improperly.
- Failure to use personal protective equipment.
- Improper lifting.
- Improper loading or placement.
- Operating at improper speed.
- Operating without authority.
- Failure to warn or secure.
- Making safety devices inoperable.
- Horseplay (inattention, "accident prone").

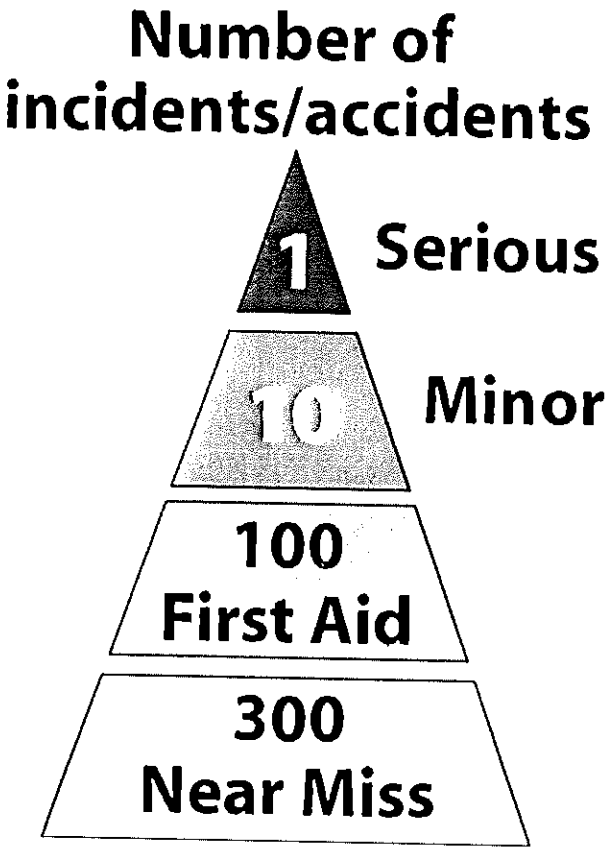
Unsafe conditions:

- Inadequate guards (i.e., missing, poorly designed, improperly used) or protection.
- Defective tools and equipment.
- Congested work areas.
- Poor housekeeping.
- Excessive noise.
- The work environment (e.g., inadequate illumination or ventilation).
- Fire or explosion hazards.
- Excessive overtime.
- Poor morale.

Let's review common types of incident categories:

- Struck against/by.
- Fall to level below/same level.
- Caught on/between/in.
- Contact with hazard sources:
  - Electricity.
  - Heat.
  - Cold.
  - Radiation.
  - Acids/Caustics.
  - Noise.
  - Biohazards.
  - Toxic or hazardous materials.

- Overexertion (overload).
- Lifting, Pulling, Pushing, Throwing, Keying.
- Animals/Insects - histoplasmosis is an example of contact with bird excrement.
- Motor Vehicle Accidents - can involve many of the above incident categories.



Basic or Root Cause of Accidents

Root causes are also referred to as basic, primary or underlying causes. The correction of a root cause will prevent recurrence of an unsafe act or condition. The immediate causes associated with the incident originate directly from root causes. Root causes are classified into two groups: personal factors and job factors. Personal factors explain why people engage in substandard personal actions. Job factors explain why substandard physical conditions are created or allowed to exist. Root causes are the origin of substandard personal actions and physical conditions (immediate causes). Failure to identify root causes allows the same type of incidents to happen again.

Personal factors such as:

- Lack of knowledge (lack of or inadequate training).
- Lack of skill (lack of training or qualifications).
- Inadequate performance capability (Does the job fit the person?).
- Stress.
- Improper motivation.
- Personal problems.

Job factors such as:

- Inadequate leadership and supervision (is there management commitment).
- Inadequate engineering or design.
- Improper tools or equipment.
- Ineffective work practices or standards.
- Excessive wear and tear on tools and equipment.
- Abuse and misuse of tools and equipment.
- Inadequate maintenance.
- Materials handling (job design/process.
- Work procedures/standards (SOP's, OSHA, USPS).
- Inadequate training.

There are four items on the Form 1769 (Accident Report) that indicate the root causes of the accident. They are interrelated and certain codes should not be used together. These items and codes are as follows: Item 25 (Hazardous Situation Directly Related to the Accident) with Code (No Hazardous Situation); Item 26 (Defective or Hazardous Equipment or Material Related to the Accident) with Code (No Defects or Hazardous Equipment or Material); Item 47 (Unsafe Personal Factors) with code (No Unsafe Personal Factor); Item 48 (Unsafe Practice) with Code (No Unsafe Practice). If all of the above Items and Codes are used on the same Form 1769, then an accident could not have occurred. One or more of these four items must have a code reflecting the root cause(s).
Root cause analysis should be an integral part of all accident investigations performed. Otherwise, appropriate measures to prevent a recurrence could be missed. Root Cause Analysis can be broken down into 5 basic steps:

1. **Define the problem.** Be specific. The problem in accident investigation is commonly referred to as the "Primary Effect."

2. **Find the facts.** Gather data. Inspect the scene, interview involved persons, and document reviews. Then you evaluate the data and obtain persons with valid expertise. Focus on identifying root causes.

3. **Identify causes and effects.** Basically, causes and effects are the same thing, differentiated only by their sequence or chronology. However, looking at both causes and effects can identify numerous corrective measures that should be instituted (for both root causes and contributory causes). Examples include:

EFFECT CAUSE

Worker injury (Primary Effect)	⇒ why	⇒ Fall
Fall	⇒ why	⇒ Wet floor surface
Wet floor	⇒ why	⇒ Leaking valve
Leaking valve	⇒ why	⇒ Gasket failure
Gasket failure	⇒ why	⇒ Inadequate PM

4. Identify and implement solutions or corrective measures. The criteria for correction measures are that they must be within your control, must prevent recurrence, and must satisfy appropriate regulatory requirements or USPS internal requirements.

5. **Verify that the solutions or corrective measures work.** Validate that the corrective solutions effectively addressed the root causes. If the event recurs, then either a root cause was missed or the corrective measures were inappropriate or ineffective.

An important part of any accident investigation is to identify the true root causes of the event. This is essential if appropriate corrective measures are to be identified and addressed to prevent the recurrence of the incident. There are many different techniques and methods that can be used to perform a Root Cause Analysis. These varying techniques range from very simple, qualitative methods to very extensive quantitative methods. For example, for very complex incidents such as the explosion of the Challenger space shuttle, more complex investigation methods are necessary in order to ensure that all of the many components and activities that could have contributed to the disaster are adequately investigated. One example is the use of the Fault Tree Analysis method, which can involve calculating mathematical probabilities for the failure of each component, each human activity, and all other aspects that could have contributed to the Primary Effect (i.e., the accident). When the use of these detailed investigative Root Cause Analysis methods are appropriate, they typically require the participation of numerous investigators who have varying areas of expertise. This is one reason why an event, such as when a passenger airline crash occurs, the investigation typically takes months to complete.

The types of incidents that typically occur at USPS facilities do not require the application of extensive, quantitative Root Cause Analysis

techniques. Two simple and effective techniques that can be effectively used to investigate USPS incidents and get to Root Cause levels of detail are Cause and Effect Diagramming (commonly referred to as Fishbone Diagramming) and the 5 Why's method.

The 5 Whys

The 5 Whys is a very simple but effective Root Cause Analysis/Accident Investigation technique. This is a qualitative method that if used properly can lead an investigation to the root cause level.

This approach simply calls for following a single line of logic by asking the question why did something happen at least five times. Each "why" question must follow a singular logic path. That is, each time the answer to a question is obtained, that answer is to be followed by the next "why."

Let's look again at the example we just used:

Sometimes there are numerous paths that can and should be followed. In the simple example above, another answer to "Why was there a wet floor surface?" could lead to looking at housekeeping practices. When these types of multiple logic paths are identified, it is recommended that you make note of the issue, but follow one path to its conclusion first. Then, the investigator can go back and explore the other issues. It is important to keep asking "Why" until it no longer makes sense to do so, or until you reach a logical stopping point. This is necessary to ensure that corrections (solutions) resolve the real problem, and not just the symptoms. Usually, by the 5th "Why," root causes will become evident.

However, in some cases, it may be necessary to ask "Why" more than 5 times.

Cause and Effect Diagramming

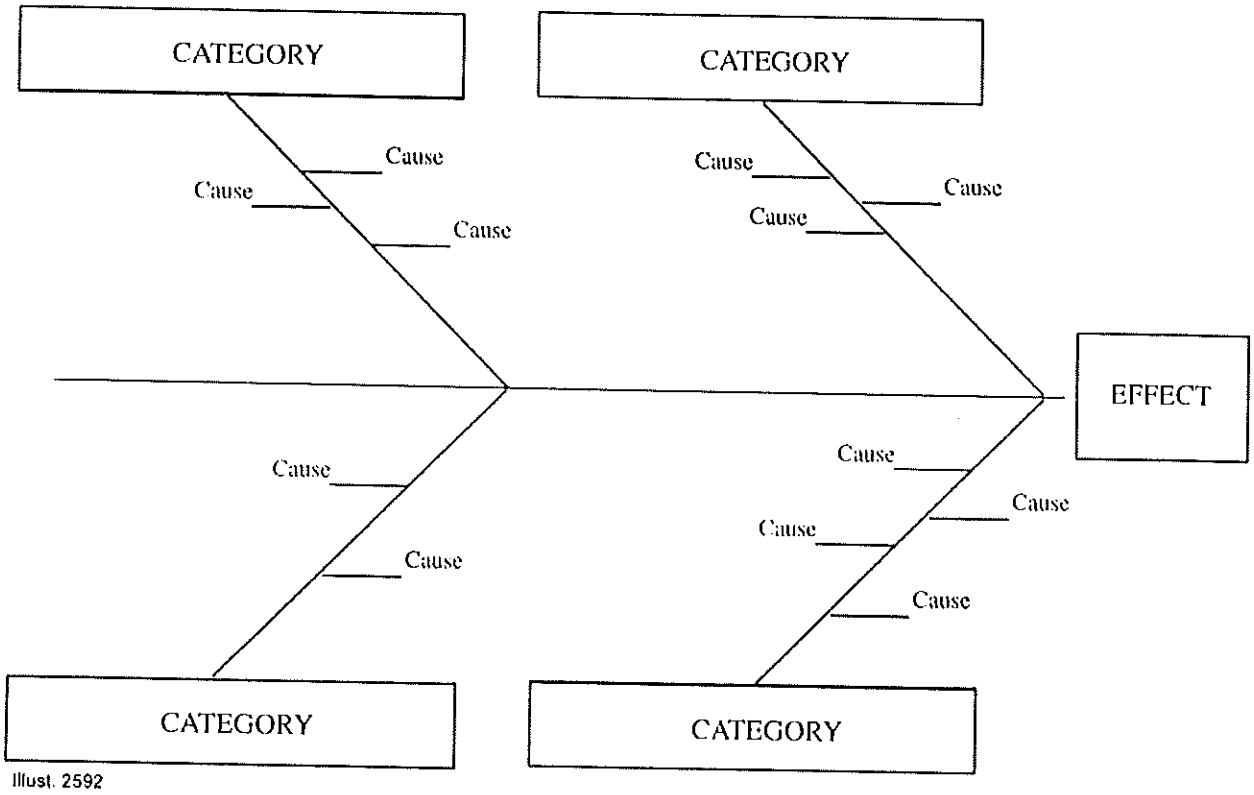
Another approach to performing an Accident Investigation to identify Root Causes is to use Cause and Effect diagramming (sometimes called Fishbone diagramming). This approach uses a graphic depiction to associate the causes that led to (or contributed to) the Primary Effect (the accident or incident). This method is similar to the "5 Why's" by continually asking why or what caused a particular effect to occur. However, this method is more structured as it directs the investigator(s) to consider specific factor areas relevant to the incident. Examples of common factor areas include:

- Environment (meaning the work area).
- Equipment and Materials.
- Management Factors.
- Human Factors (people).
- Training Factors.

When using this technique, one of the first activities is to perform an investigation. If it becomes evident during the analysis that other factor areas should be explored, then they should be added.

Remember that the terms "cause" and "effect" are essentially the same thing depending on where in sequence you are. That is, each effect can also be viewed as a cause of another effect. For example, the effect of a broken hand can be caused by a worker falling. The effect of the worker falling was caused by a slip on an oil spill on the floor, and so on. In Cause and Effect diagramming, this logic is applied until all reasonable effects and causes in the common factor areas have been identified. The attached figure depicts a typical blank Cause and Effect diagram.

CAUSE AND EFFECT DIAGRAMMING "FISHBONE" DIAGRAM BRAINSTORM TO FIT CAUSES INTO CATEGORIES



Illust. 2592

Hazard Definition

Hazard is defined as any existing or potential condition in the workplace which, by itself or interacting with other variables, can result in the unwanted effects of death, injury, property damage or other loss.

We often think of accidents as resulting from two types of hazards. These hazards include unsafe or substandard acts and unsafe or substandard conditions. These are frequently referred to as immediate causes of accidents. The early Safety Management theory believed that in order to stop or prevent accidents, the unsafe act or condition must be removed. This was depicted as a

set of dominoes falling, which was initiated by the unsafe act or condition. We now know that there are underlying causes for the accident. But, we also know that Heinrich's theory was too simplistic! Decades of focus on unsafe conditions/acts as well as the establishment of OSHA have failed to significantly halt occupational injuries and illnesses.

NATIONAL USPS/NALC JOINT SAFETY & ACCIDENT CONTROL TEAM

UNITED STATES POSTAL SERVICE

NATIONAL ASSOCIATION OF LETTER CARRIERS U.S.A.

TEAM CO-CHAIRS

USPS	NALC
Linda Pyle	Pat Carroll

SAFETY DEPENDS ON ME!

1 of 1

Common Causes of Accidents

- Accidents may be caused by:
  - People
  - Equipment
  - Materials
  - Procedures
  - Environment

Definition of root cause:

The cause of a problem which, if adequately addressed, will prevent recurrence of that problem or similar problems.

Immediate causes are the symptoms of Root Cause

- Root causes are also referred to as basic, primary or underlying causes
- The correction of a root cause will prevent recurrence of an unsafe act or condition

Root Causes are classified into two groups

- Personal Factors
  - Substandard personal actions
- Job Factors
  - Substandard physical conditions are created or allowed to exit

Immediate Causes of Accidents

- Known as:
  - Unsafe Acts
  - Unsafe Conditions
  - Secondary Causes
  - Contributory Causes

Basic or Root Cause of Accidents

5 Basic Steps:

1. Define the problem
2. Find the facts
3. Identify causes and effects
4. Identify and implement solutions or corrective measures
5. Verify solutions or corrective measures work

The Importance of WHY

EFFECT		CAUSE
Worker injury	→ why	Fall
Fall	→ why	Wet floor surface
Wet floor	→ why	Leaking valve
Leaking valve	→ why	Gasket failure
Gasket failure	→ why	Inadequate PM

U112

Job Safety

Analysis (Generic)

Title: NALC Good Idea - Loading and Unloading 1046P Hampers with Raised Platforms (inserts)

*Note: This document verifies the hazard assessment as required by 29 CFR 1910.132(d)(2).

Location (e.g., Station, Branch, Plant)	Job Description:	Titles of Employees Performing the Job:	Occupational Codes:
Name:	Removing Mail from the Floor (Reducing Repetitive Bending)	Carriers – City and Rural	
Street Address 1:			
City:			
State:	Location Description:		
Zip Code:	Workroom floor		
Area:			
PC:			

Author	Local Reviewer	Local/Area/National Reviewer
Name: NALC Joint Safety Task Force	Name:	Name:
Title: Members	Date:	Date:
Date: 2/25/2008	Approval:	Approval:

Sequence of Basic Steps	Potential Hazards and Effects	Safe Work Practices	Required PPE*
1. Inspect hamper	1.1. Hazard: Damaged hampers/inserts Effect: Cuts from sharp edges/splintered wood	1.1. Inspect hampers before loading, look for broken parts, ripped fabric, splintered wood and jagged steel. If a defect is found, "Red Tag" (Form 4707) hamper/insert and follow procedures to repair or discard hamper/insert	Appropriate Footwear (all sections).
2. Load and unload hamper	2.1. Hazard: Awkward posture when loading hamper Effect: Shoulder, back, and leg strain when handling mail 2.2. Hazard: Unbalanced/ overloaded hamper Effect: Overexertion or strain when trying to catch falling load 2.3. Hazard: Lifting trays Effect: Overexertion or strain	2.1. Position body as close to hamper as possible. Keep mail close to body. Keep back as straight as possible. Avoid twisting body with load. Slightly bend knees and lower load into hamper. 2.2. Load hamper so that mail is evenly distributed. Do not overload. Do not try to catch load if it starts to fall. 2.3. Position hamper close to load. Use proper lifting techniques	

Ergonomic Risk Assessment: **Health Risk Assessment Code:** **Safety Risk Assessment:**

Qualitative/Quantitative Exposure Assessment Data **Supporting Postal Service Policy Documents**

Supporting Safety Talks **Supporting JSAs**

Required Training

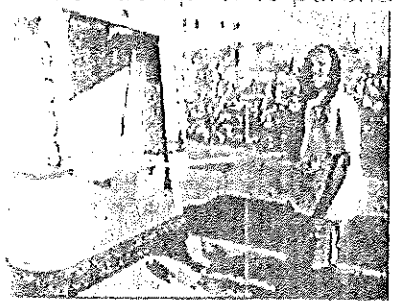
U113

Title:	Link:	Course No. Title:	Course

Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution. **It is recommended that only limited quantities be purchased at one time (purchase in small increments based on employee interest, local needs, and local budgeting).**

LLV/FFV Mail Hook is a light weight plastic pole and "hook" approximately 3 feet long (or longer if desired). Letter carriers can use this tool to extend their reach to push or pull mail containers in the cargo area when loading or unloading their vehicle. The tool reduces the bending necessary and sometimes arkward positioning associated with loading/unloading mail containers in the cargo area, helping avoid back, neck, and shoulder injuries. The type of vehicle, employee stature, and delivery method should be taken into consideration prior to purchase.



Ordering Information:
Beckson Manufacturing, Inc.
165 Holland Ave.
Bridgeport CT 06605-2136
Ph. 203-366-3644, Fax. 203-384-6954
http://www.becksonmfg.com/

Velcro Strips (for use with LLV/FFV Mail Hooks) are the only method approved by a Vehicle Maintenance Bulletin for securing a mail hook in a postal vehicle. The Velcro strip is affixed to the pole section of the mail hook, and another Velcro strip is affixed to a flat surface (e.g., a rear wall) inside the postal vehicle. The mail hook should always be secured inside the postal vehicle by the Velcro Strips when not in use.

Ordering Information
W.W. Grainger, Inc (on-catalog E-Buy order)
Address: use "branch locator" on website -Ph. 1-888-361-8649
Item # 6JT84 (see *Vehicle Maintenance Bulletin V-06-03, Sect. 6*)

Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution.

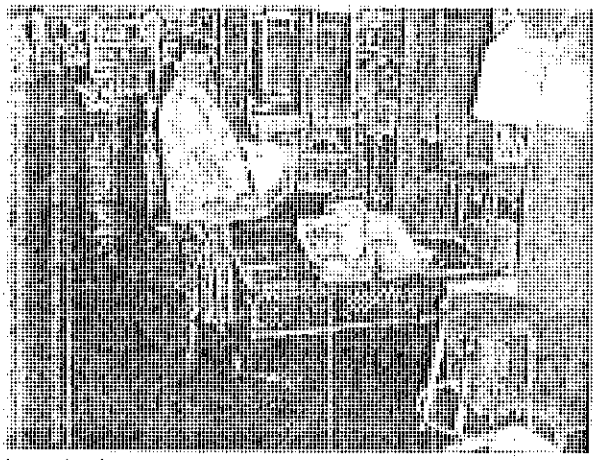
Hamper Insert is a flat "platform" that fits on ledges inside the hamper creating an elevated platform. Mail containers placed on the platform are higher, reducing the lifting distance required to load and unload mail into the hamper. This helps to reduce back strains and other lifting injuries.

Ordering Information:
Postal Products Unlimited
500 W Oklahoma Ave.
Milwaukee, WI 53207
Ph. 800-229-4500
Item # 33836
http://www.postalproducts.com/

Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution.

Milk Crates (to elevate mail off the workroom floor) - strong plastic containers inverted & held together to create an elevated horizontal surface. Mail containers put on the elevated surface during distribution of mail to letter carrier cases, and as carriers retrieve the containers or mail from a container, reduce the lifting distance required for employees. Floor space, appropriate placement, and securing the milk crates together safely must be considered when using this tool to avoid impeding access or travel space on the workroom floor. Also, be sure employees do not increase "lifting and twisting" actions when using this tool. Space constraints may not allow elevating all mail containers, however each tool of mail elevated off the floor can reduce required lifting distances, and over time reduce the exposure to back strains and other lifting injuries. Supervisors and managers can also consider using sort bins attached to carrier cases to elevate mail distributed to carrier cases.



Ordering Information:

Milk Crates: Melmat, Inc. (off-catalog E-Buy order)
5333 Industrial Drive
Huntington Beach CA 92649-1516
Ph: 800-635-6239 / Fax: 714-379-4554
Item # HLA-24
http://www.thomasnet.com/profile/158632/melmat-inc.html

ort Bins. Postal Products Unlimited (see contact information above)
item # N1020317 (Right) / item # N1020318 (Left)

UNITED STATES
POSTAL SERVICE

April 24, 2008

VICE PRESIDENTS, AREA OPERATIONS
NATIONAL BUSINESS AGENTS, NATIONAL ASSOCIATION OF LETTER CARRIERS

SUBJECT: Tools for Injury Reduction ("Good Ideas")—U.S. Postal Service/National Association of Letter Carriers' National Joint Safety Task Force

Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling mail. Pilot testing and the Customer Service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may help reduce injuries and Muscular-Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects)

A description of the approved tools is attached. Local managers who want to use these items should engage their National Association of Letter Carriers—National Business Agent; the Area and District Manager, Safety; and (where in use) the District Safety Committee.

Additional information including testimonials from carriers involved in testing can be found on the Safety and Environmental Resources web page at: http://safetytoolkit.usps.gov/resources.aspx.

The "good ideas" tools are:

- Utility/Mail Hooks—plastic rods with a hook to extend the reach of the carrier in loading/unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles
- Hamper Inserts—inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail
- Mail Elevation Units—"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting). Sort bins attached to carrier cases are also alternatives for raising flats off the floor. (Flats Sequencing System sites should coordinate plans for future equipment based on anticipated flat volume to be handled at the case.)

We appreciate your consideration of these tools, and your continued support in safety improvement.

Doug A. Tulino
Vice President
Labor Relations
U.S. Postal Service

William H. Young
President
National Association of
Letter Carriers, AFL-CIO

475 L'Enfant Plaza SW
Washington DC 20260

UNITED STATES
POSTAL SERVICE

April 24, 1998

[illegible]
[illegible] BUSINESS AGENTS, NATIONAL ASSOCIATION OF LETTER CARRIERS

SUBJECT: Tools for Injury Reduction – Good Ideas – U.S. Postal Service/National Association of Letter Carriers National Joint Safety Task Force

In consistent with its previous commitment to improve safety, the National Joint Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, carrying, and handling mail. Pilot testing and the Customer Service Engineering Development Process indicated that tools in the evaluation may reduce injuries and Musculoskeletal Disorders (repetitive motion injuries) related to lifting, reaching, and manual handling of mail.

In deference to the approved [illegible] in agreements, we do not believe these items should engage the National Association of Letter Carriers—National Business Agent, the Area and District Management, Safety, and [illegible] the District Safety Committee.

Additional information concerning testing results, [illegible] Safety and Environmental Resources [illegible]

[illegible]

- [illegible] Mail Handling [illegible] the [illegible] and from Long Life Vehicles and Flexible Fuel Vehicles.

- Hamper Inserts – [illegible] with [illegible] Hamper Inserts to use the [illegible] trays/tubs [illegible] loaded into the hamper to reduce the amount of lifting and bending the [illegible].

- Mail Elevator Platform – [illegible] Mail Elevator Platform [illegible] testing under [illegible] Carrier Cases are also alternatives for [illegible] Postal Service Engineering Systems has [illegible] plans for [illegible] scheduled for [illegible].

We appreciate your [illegible] and your continued support in safety improvement.

[illegible]
[illegible]
[illegible]

William H. [illegible]
William H. [illegible]
President
National Association of Letter Carriers, AFL-CIO

U120

2005 Comprehensive Statement on Postal Operations

of the unions and management associations, supported financially by Postal Service employees primarily through the payroll deduction program of the Combined Federal Campaign. The fund was started in 1990 in response to the many employees in the Southeast U.S. and Caribbean who had their homes and property damaged by Hurricane Hugo. Since then, more than 3 thousand employees affected by subsequent natural disasters including floods, hurricanes, tornadoes, earthquakes and fires have been the recipients of grants totaling over $5 million. PERF will continue to serve an instrumental role in the recovery for employees who live and work in the parts of Louisiana, Mississippi, Alabama, Texas, and Florida that were declared disaster areas as a result of Hurricanes Katrina and Rita.

H. SAFETY

In 2005 the Postal Service continued to experience significant improvement in its safety program. Accident reduction plans targeted the most serious and prevalent accident causes. The Postal Service issued guidance and direction to employees on a wide variety of safety and health issues. Through mandatory safety talks, videos, and publications, employees were apprised of how to avoid injuries and illnesses. The award winning *Safety Depends on Me* video campaign, part of the Postal Service's overall employee safety and health communication program, provides employees with safety and health information.

The Occupational Safety and Health Administration (OSHA) 2005 injury and illness frequency rate for the Postal Service was 5.74 per 100 employees. This is down 13 percent from last year and equates to 5,748 fewer OSHA injuries and illnesses. In the past four years the Postal Service has reduced the total number of OSHA injuries and illnesses by 29,110, a 41 percent reduction. The Postal Service motor vehicle accident frequency rate was 10.3 per million miles, down 1.26 percent from last year. In the past 4 years the Postal Service has reduced its total number of motor vehicle accidents by 2,559, a 9.9 percent reduction.

The Postal Service continued involvement with emergency preparedness improvements, as well as with safety requirements mandated by the Department of Homeland Security (DHS).

I. VOLUNTARY PROTECTION PROGRAMS

The Postal Service continues to partner with OSHA to implement its prestigious Voluntary Protection Program (VPP) in Postal Service facilities. VPP was created to recognize and encourage excellence in occupational safety and health protection. Participation requires comprehensive management systems with employees actively involved in anticipating, evaluating, and controlling the potential safety and health hazards. OSHA recognizes only those facilities that have implemented the best safety and health programs in industry.

To date the Postal Service has 49 worksites approved in VPP, 13 onsite evaluations scheduled, and 20 applications in review.

VPP is being implemented through the national, area, and local Joint Labor-Management Safety Committees. The decision to enter into the VPP process is a joint decision made between the unions and the Postal Service at the local level. A key benefit is improved employee relations that result from the cooperative involvement of management, OSHA, and the unions working together in its implementation.

J. ERGONOMIC RISK REDUCTION PROCESS

The Ergonomic Risk Reduction Process (ERRP) is designed to reduce both the number and severity of musculoskeletal disorders, build labor/management teams with ergonomic skill, and cultivate partnerships to identify and control ergonomic risk, among the Postal Service, OSHA, the National Postal Mail Handlers Union (NPMHU), the American Postal Workers Union (APWU), and the National Association of Letter Carriers (NALC). As of September 2005, 67,587 postal employees at 93 facilities have received training in ERRP since inception in 2003. In 2005 the ERRP teams analyzed 4,665 tasks, resolved 3,276 tasks, and implemented 2,161 fixes locally. ERRP is scheduled to be implemented in 27 sites in 2006, 32 in 2007, and 31 in 2008.

Customer Service employees have also requested an ergonomic process to assist in the identification and reduction of musculoskeletal disorders. The organization of ERRP for Customer Service differs from the plants since CS ERRP is not confined to a single building. A model for CS ERRP was developed and successfully tested in 2005.

K. INJURY COMPENSATION

In 2005 the Postal Service had a decrease in workers' compensation chargeback from Department of Labor's Office of Workers' Compensation Programs (OWCP) of approximately $12.0 million below 2004. This reduced the total cash payout to $885.4 million. This total includes all Postal Service, Post Office Department, and administrative costs for the chargeback year.

The Postal Service continues to work closely with the OWCP to place injured employees who cannot be accommodated within the Postal Service into private sector assignments. In 2005 the program resulted in the outplacement, retirement, or reduction in compensation payments for 217 employees. Since inception of the Outplacement Rehabilitation Process, the Postal Service has reduced the annual compensation cost by over $11.5 million.

In continuing efforts to reduce workers' compensation medical costs, two new initiatives have been identified for implementation. Currently under development is the Pharmacy Card Program, which is designed for employees

DRAFT:

The National USPS-NALC Joint Safety and Accident Control Team was recently assigned the task of evaluating the current accident investigation process and to make recommendations to improve the quality of information gathered.

In an effort to achieve this goal we have determined that it is necessary to establish guidance and training so that all necessary facts are properly gathered and we are able to properly identify the true root cause of an accident.

As a point of reference, on March 12, 2012, Richard Fairfax, Deputy Assistant Secretary of OSHA issued a memo on employer safety incentives and disincentives. In that memo he writes:

> Section 11(c) of the OSH Act prohibits an employer from discriminating against an employee because the employee reports an injury or illness...Reporting a work-related injury or illness is a core employee right, and retaliating against a worker for reporting an injury or illness is illegal discrimination under section 11(c)...If employees do not feel free to report injuries or illnesses, the employer's entire workforce is put at risk. Employers do not learn of and correct dangerous conditions that have resulted in injuries, and injured employees may not receive the proper medical attention, or the workers' compensation benefits to which they are entitled. Ensuring that employees can report injuries or illnesses without fear of retaliation is therefore crucial to protecting worker safety and health.

We must, through our behavior, encourage the reporting of accidents/injuries so that we may gather all necessary information, study what was discovered and then develop a solution that helps prevent a similar event in the future.

The Handbook EL-809, at Section V defines duties and responsibilities of Safety Committee Members. Among the responsibilities of the local safety committee are the following:

4. Monitor the progress of accident prevention and health activities, and, when necessary, make recommendations for improvement to the installation head...

8. Review PS Forms 1767, Report of Hazard, Unsafe Condition, or Practice, and responses or corrective action taken.

9. Review PS Forms 1769/301 and statistics from the National Accident Reporting System and the injury compensation program reporting system.

When an accident/injury is reported we must avoid setting blame and instead, focus on solutions.

U124

ERGONOMIC STRATEGIC PARTNERSHIP

BETWEEN

OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION

AND

UNITED STATES POSTAL SERVICE

AND

UNITED STATES POSTAL SERVICE UNIONS

U125

ERGONOMIC STRATEGIC PARTNERSHIP

I. BACKGROUND

It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force, and for the Unions to cooperate with and assist management to live up to this responsibility. The United States Postal Service (USPS), National Postal Mail Handlers Union (NPMHU), and American Postal Workers Union, AFL-CIO (APWU) recognize the importance of reducing musculoskeletal disorders (MSDs). It is agreed that entering into an Ergonomic Strategic Partnership (ESP) process with the Occupational Safety and Health Administration (OSHA), the United States Postal Service, National Postal Mail Handlers Union, and the American Postal Workers Union, AFL-CIO will enhance ergonomic controls at USPS facilities.

II. GOALS AND OBJECTIVES

The USPS, NPMHU, APWU, and OSHA will work cooperatively to implement an ongoing process to identify MSDs early, and control the risk factors that can cause injuries and illnesses to postal employees. To accomplish this will require management, unions, and OSHA to have meaningful involvement and participation in the process. Under the direction of the national USPS/NPMHU Joint Labor-Management Safety Committee and the USPS/APWU Joint Labor-Management Ergonomic Committee, the Unions at the national level will evaluate and make recommendations on all aspects of the ESP process to include program adequacy, field implementation, training and unsafe conditions.

Specifically, the ESP process is designed to accomplish the following goals at participating USPS worksites:

A. Improve the safety and health environment so that OSHA, USPS, NPMHU, and APWU can work together to reduce MSDs.

B. Identify tasks and conditions where MSD incidents occur and develop and implement ergonomic control processes to reduce or eliminate MSD incidents.

C. Train USPS local managers, supervisors, NPMHU and APWU representatives, and the local Joint Labor-Management Safety and Health Committees to ensure comprehension of ergonomic risks and control processes.

D. Reduce the number of MSD related incidents thereby reducing the number of days away from work for both lost workday and restricted duty cases associated with MSD incidents.

E. Develop and evaluate best proven practices to be implemented in other postal facilities with similar ergonomic issues. Share best proven practices with applicable USPS operations with similar ergonomic issues.

F. Train local employees as appropriate to participate in the ergonomic risk reduction process.

III. STRATEGIES FOR ATTAINING GOALS

USPS, NPMHU, APWU and OSHA will work in concert employing the following strategies to achieve the aforementioned goals:

A. Establish a national Ergonomic Work Group (EWG) consisting of USPS, Joint USPS/NPMHU Labor-Management Safety Committee, USPS/APWU Joint Labor-Management Ergonomic committee, and OSHA representatives to ensure the consistent implementation and evaluation of the ESP process.

B. To the extent possible, identify one or more sites in each of OSHA's 10 regions covering USPS's 9 areas to participate in the ESP process. The goal in calendar year 2003 is to start an ergonomics process in 30 sites.

The process will be tested in 10 sites to start. Expansion to additional sites will be discussed and recommendations made by the USPS/APWU Joint Labor-Management Ergonomic Committee and the national Joint USPS/NPMHU Labor-Management Safety Committee. OSHA representative(s) may attend this meeting.

C. As resources allow, OSHA will assist in the implementation of the ESP process through a variety of means including:

1. Technical ergonomic assistance
2. On-site support to ensure continued success of ESP process efforts
3. Participation in joint safety and health committee meetings
4. Participation in training
5. Identification of mentoring resources
6. Participation on the Ergonomic Work Group

D. Participating sites through their respective local Joint Labor-Management Safety and Health Committees will identify and prioritize work activities for the development and implementation of ergonomic control processes to include:

1. Management Leadership
2. NPMHU and APWU Representative/Employee Participation
3. Job Hazard Analysis
4. Hazard Prevention and Control
5. Training
6. Program Evaluation

E. USPS, NPMHU (National USPS/NPMHU Joint Labor-Management Safety Committee), and APWU (National USPS/APWU Joint Labor-Management Ergonomic Committee) will identify and make available best proven practices to be shared with other Postal Service facilities with similar risk in a timely manner.

F. USPS, APWU, and NPMHU will provide OSHA with best practices that have universal application. OSHA may share such information with like industries.

IV. INCENTIVES

OSHA will offer the following incentives for USPS worksites participating in the ESP process:

A. As resources allow, provide priority on-site ergonomic technical assistance to assist and advise on specific issues.

B. Maximum allowable penalty reductions for ergonomic and other violations abated in a timely manner, as allowed by OSHA's Field Inspection Reference Manual (FIRM).

C. Six month deferral in programmed inspections at partnering sites from the date of the partnership, as provided by OSHA's Site Specific Targeting (SST) or other targeting programs.

D. Twelve month deferral from OSHA programmed inspections for sites that undergo an OSHA onsite verification inspection, provided the site implements the ergonomic control methods in good faith. Refer to Section VII (Verification).

E. Opportunities to identify mentors from VPP sites that have effective ergonomic programs.

F. OSHA recognition for partnership activities and successes.

V. ESP PROCESS OVERSIGHT

A. A national Ergonomic Work Group (EWG) will be formed to facilitate the implementation and management of the ESP process.

1. The EWG will, at a minimum, include up to the number of representatives from each of the following organizations/offices as identified below:

- USPS National Office — six
- NPMHU National Office — three
- APWU National Office — three
- OSHA — three

1. The EWG will be responsible for:

   - Monitoring the ESP process and resolving issues
   - Determining the appropriate ESP process measurements
   - Receiving and evaluating ESP process data from participating sites.
   - Preparing a written annual evaluation of the ESP process

2. The EWG will meet at least semi-annually. The first meeting will be held within 60 days of agreement signing. In addition, conference calls may be held as necessary, but at least quarterly.

B. Teams will be established for each participating site to facilitate the progress of the ESP process, to provide an onsite presence at the initial site implementation, as well as enhance communication between the USPS, NPMHU, APWU, and OSHA at the local and national levels.

The teams will consist of the following:

1. OSHA regional or area office staff representative(s)
2. A national representative from each Union
3. USPS national representative

VI. MEASUREMENT AND EVALUATION SYSTEM

The EWG will develop and implement appropriate procedures to measure the progress of the ESP process in terms of meeting its goals. At a minimum, baseline data will be developed and the following will be evaluated:

A. Measures of MSD injury/illness cases at participating sites

B. Extent of local joint safety and health committee participation in the ESP process

C. To the extent possible, employees' perceptions of the ESP process' impact on worker safety and health

D. Measures of incidence and severity criteria (in comparison with the baseline numbers)

E. Number of managers and employees trained

F. Number of best practices shared

G. Number of tasks reviewed and correction(s) implemented

These factors and other appropriate information will be provided by the USPS and presented at the semi-annual EWG meetings for review and comment. In addition, the EWG will prepare annual ESP process evaluations. The annual evaluations will be subject to review and discussion by EWG representatives prior to their publication.

VII. VERIFICATION

Verification of good faith by the participants will be effected through both off-site and on-site methods.

A. Data compiled and reviewed semi-annually by the EWG will be the basis for off-site verification.

B. On-site verification will involve on-site evaluations performed by the EWG or their representatives. At least two onsite evaluations will be conducted jointly each year. OSHA will conduct at least two independent on-site ESP process evaluations.

On-site verification visits will be conducted in accordance with OSHA's Training and Education Directive (TED) 8.01, OSHA Strategic Partnership Program.

VIII. EMPLOYEE RIGHTS

Nothing in this agreement shall be construed to preclude bargaining unit employees from exercising any right provided under the OSH Act, nor does it eliminate their responsibility to comply with any provision of the Act, or any standard or regulation promulgated pursuant to the Act.

This ESP agreement does not supersede or modify the current National Agreements and supplements thereto between the US Postal Service and the Unions.

IX. ENFORCEMENT

Participating USPS sites will remain subject to OSHA enforcement inspections and sanctions except as specified under Section IV (Incentives) of this agreement. OSHA will give appropriate consideration to any USPS sites that have implemented effective ergonomic processes or that are making good faith efforts to reduce ergonomic hazards.

X. TERM OF AGREEMENT

This agreement will be in effect for a period of three (3) years from the date of signing. The agreement may be renewed by mutual agreement of all parties.

XI. TERMINATION

Any party to this agreement may, with 30 day written notice to the other parties, withdraw from the partnership.

ERGONOMIC STRATEGIC PARTNERSHIP

SIGNATORIES

John E. Potter
Postmaster General, CEO
United States Postal Service

John L. Henshaw
Assistant Secretary
Occupational Safety and Health Administration

William Burrus
President
American Postal Workers Union, AFL-CIO

John F. Hegarty
National President
National Postal Mail Handlers Union, A Division of Laborers' International Union of North America, AFL-CIO

U132

UNITED STATES
POSTAL SERVICE

April 4, 2003

VICE PRESIDENTS, AREA OPERATIONS
MANAGER, CAPITAL METRO OPERATIONS

SUBJECT: Ergonomic Risk Reduction

The National Postal Mail Handlers Union, the American Postal Workers Union, and the Occupational Safety and Health Administration (OSHA) have become strategic partners in the Ergonomic Risk Reduction Process with the United States Postal Service (please see attached partnership agreement).

In the partnership, OSHA and the unions have entered into an extended, voluntary, cooperative relationship in order to encourage and assist the Postal Service in the reduction of injuries and ergonomic related hazards.

Also through this partnership, the Postal Service, the unions, and OSHA will identify common goals, develop plans for achieving those goals, and cooperatively implement the process.

We just initiated the ergonomics risk reduction process at ten sites and have already reaped benefits from the affiliation. Our experience thus far indicates the partnership creates a synergy that will enhance the success of the ergonomic risk reduction process.

Larry Elyea and his team look forward to working with you on this opportunity.

Suzanne F. Medvidovich

Patrick R. Donahoe
Chief Operating Officer
and Executive Vice President

Suzanne F. Medvidovich
Senior Vice President
Human Resources

Attachment

Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution.

Milk Crates (to elevate mail off the workroom floor) - strong plastic containers inverted & held together to create an elevated horizontal surface. Mail containers put on the elevated surface during distribution of mail to letter carrier cases, and as carriers retrieve the containers or mail from a container, reduce the lifting distance required for employees. Floor space, appropriate placement, and securing the milk crates together safely must be considered when using this tool to avoid impeding access or travel space on the workroom floor. Also, be sure employees do not increase "lifting and twisting" actions when using this tool. Space constraints may not allow elevating all mail containers, however, each foot of mail elevated off the floor can reduce required lifting distances, and over time reduce the exposure to back strains and other lifting injuries. Supervisors and managers can also consider using sort bins attached to carrier cases to elevate mail distributed to carrier cases.

Ordering Information:

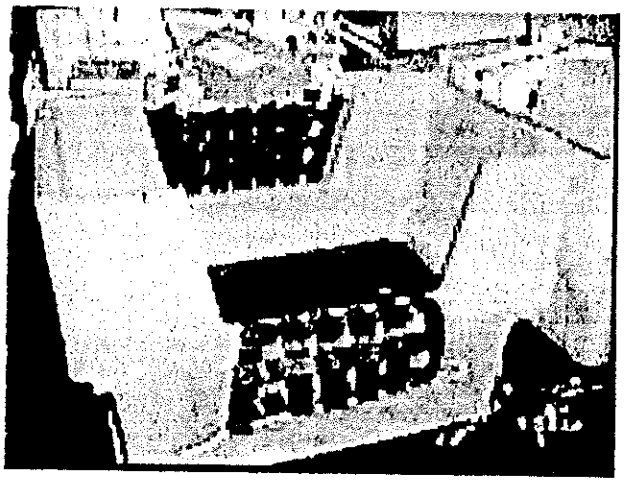
Milk Crates: Melmat, Inc. (off-catalog E-Buy order)
5333 Industrial Drive
Huntington Beach CA 92649-1516
Ph: 800-635-6289 / Fax: 714-379-4554
Item # HLA-24
http://www.thomasnet.com/profile/189632/melmat-inc.html

http://www.grainger.com/Grainger/wwg/start.shtml

Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution.

Hamper Insert is a flat "platform" that fits on ledges inside the hamper creating an elevated platform. Mail containers placed on the platform are higher, reducing the lifting distance required to load and unload mail into the hamper. This helps to reduce back strains and other lifting injuries.



Ordering Information:
Postal Products Unlimited
500 W Oklahoma Ave.
Milwaukee, WI 53207
Ph: 800-229-4500
Item # 33836
http://www.postalproducts.com/

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Good Ideas" Project: Equipment Description and Ordering Information

Note: Use of these tools requires local purchasing, following prescribed internal purchasing requirements. The vendor(s) noted in this attachment are not to be considered as a USPS sole source vendor for the purchase of this tool. Other vendors should be considered when purchasing this tool or a similar type solution. **It is recommended that only limited quantities be purchased at one time (purchase in small increments based on employee interest, local needs, and local budgeting).**

LLV/FFV Mail Hook is a light weight plastic pole and "hook" approximately 3 feet long (or longer if desired). Letter carriers can use this tool to extend their reach to push or pull mail containers in the cargo area when loading or unloading their vehicle. The tool reduces the bending necessary and sometimes arkward positioning associated with loading/unloading mail containers in the cargo area, helping avoid back, neck, and shoulder injuries. The type of vehicle, employee stature, and delivery method should be taken into consideration prior to purchase.

Ordering Information:
Beckson Manufacturing, Inc.
165 Holland Ave.
Bridgeport CT 06605-2136
Ph: 203-366-3644, Fax: 203-384-6954
http://www.becksonmfg.com/

Velcro Strips (for use with LLV/FFV Mail Hooks) are the only method approved by a Vehicle Maintenance Bulletin for securing a mail hook in a postal vehicle. The Velcro strip is affixed to the pole section of the mail hook, and another Velcro strip is affixed to a flat surface (e.g., a rear wall) inside the postal vehicle. The mail hook should always be secured inside the postal vehicle by the Velcro Strips when not in use..

Ordering Information:
W.W. Grainger, Inc (on-catalog E-Buy order)
Address: use "branch locator" on website -Ph: 1-888-361-8649
Item # 6JT64 (see *Vehicle Maintenance Bulletin V-06-03, sect. III*)

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RON ERLAND, *Treasurer*
J.E. WOODARD, *Financial Secretary*
MICHAEL ENGLAND, *Sergeant-At-Arms*
GLENN WATTS, *Director of Retirees*

M. L. (Rip) MALONE
BRANCH NO. 4

RAY RAYMER, *N.S.B.A. Clerk*
C. R. HIRST, *Trustee*
DALE LYLES, *Trustee*
JAMES BROWN, *Trustee*

U136

National Association of Letter Carriers

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Nashville, TN 37214
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REQUEST FOR INFORMATION
(CONTRACTUAL)

Date of Request 8/27/2014

Belle Meade
Station/Office

Dear Management:

Pursuant to Articles 17 and 31, of the National Agreement, I am requesting copies of the following information and/or documents, these documents are needed to investigate a possible grievance.

* The "Eastern Area Delivery foundation" memo or policy
* The Author of this memo or policy (name or names)
* Time to interview this person or persons
* All data or information gathered by Management from their studies showing that ergonomically it is putting carrie in a safer situation placing bundled flats on the ground rather than the existing practice of placing them in tubs

This information/documentation is needed for the union to investigate a **POSSIBLE GRIEVANCE** pertaining to: Articles 5 past practice 14 safety & 19 via EL 805 acknowlegement of Ergonomics

Management's Signature: Barb Montgomery Date: 8/28/2014

Date Union received documentation _____

Thomas L. Rollins, President
NALC Branch 4
Nashville, TN. 37214-0816

RON ERLAND, *Treasurer*
J.E. WOODARD, *Financial Secretary*
MICHAEL ENGLAND, *Sergeant-At-Arms*
GLENN WATTS, *Director of Retirees*

M. L. (Rip) MALONE
BRANCH NO. 4

RAY RAYMER, *N.S.B.A. Clerk*
C. R. HIRST, *Trustee*
DALE LYLES, *Trustee*
JAMES BROWN, *Trustee*

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National Association of Letter Carriers

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Nashville, TN 37214
(615) 883-7687

REQUEST FOR INFORMATION
(CONTRACTUAL)

Date of Request 8/28/2014

Belle Meade
Station/Office

Dear Management:

Pursuant to Articles 17 and 31, of the National Agreement, I am requesting copies of the following information and/or documents, these documents are needed to investigate a possible grievance.

* What evidence does the employee have that the agreement between Doug Tillino & William Young dated April 24 2008 has been made obsolete.
* What provision of any handbook or manual is "house keeping" covered under.
* Copies of all 1767's turned in due to tickets being removed

This information/documentation is needed for the union to investigate a **POSSIBLE GRIEVANCE** pertaining to: Article 5 past practice, 14 safety & 19 via EL 805 acknowledgment of Ergonomics

Management's Signature: [signature] Date: 8/28/2014

Date Union received documentation _____

Thomas L. Rollins, President
NALC Branch 4
Nashville, TN. 37214-0816

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UNITED STATES POSTAL SERVICE

Time Limit Extension

Informal Step A X

Formal Step A _____

Appeal To Step B _____
(Check One)

The parties mutually agree to extend the time limits on the following Informal/Formal Step A Grievance(s) or appeal to Step B until the following date 9/22/2014

Union submitted request for Information on 8/27 & 8/28. This information has still not been provided at this date. The union will extend the time limit one more week to try and get its requested

Grievant(s) Name/Class Class Action concerning placing Information mail on floor

This Grievance Number _____

Local Grievance # _____

E. Bautes 9-15-14 Corey J Walk 9/15/2014

U.S.P.S. Representative Date NALC Representative Date

NALC - USPS Guidelines for Administration of Informal and Formal Step A
April 6, 2005

September 22, 2014

Informal Step A

Corey Walton,

The documentation dated April 24, 2008 between Tuillino and Young isn't an agreement. It's a "good idea" suggestions that has nothing to do with flat tubs but its talking about hampers.

Eric Baxter

J140

EDWARD F PHELAN, JR.
VICE PRESIDENT
DELIVERY AND POST OFFICE OPERATIONS

UNITED STATES POSTAL SERVICE

January 24, 2013

MANAGERS, OPERATIONS SUPPORT (AREA)
MANAGERS, DELIVERY PROGRAMS SUPPORT (AREA)

SUBJECT: AM Standard Operating Procedures (AMSOP)

In FY 2013, Delivery Operations is undertaking a restructuring effort of the AM Standard Operating Procedures (AMSOP) certification process in order to improve our operational efficiency and cost effectiveness. This is of importance given our challenging economic environment and the conditions that our organization is experiencing Currently, some minor changes have been made that includes new established and revised procedures to improve operations. The efforts of our delivery units play a key role in the overall operational efficiency of AMSOP

As a result and effective February 1, 2013 the new certification will be considered valid for two years. Any site certified prior to January 31, 2011 will no longer be considered certified and will be required to pass a new audit review before the delivery unit can once again be considered as AMSOP certified.

The expectation is to certify one-third (33) percent of all EAS-level 21 and above offices every 24 months, as well as, all existing Flat Sequencing System (FSS) sites and all new FSS sites prior to receiving FSS mail. Each Area is required to certify twenty-five (25) percent of their yearly target per postal quarter. An excel spreadsheet identifying sites requiring certification will be provided to each Area. The ultimate goal is to implement AMSOP in every delivery unit. Site certifications will still be tracked through the "Delivery and Customer Service Certification" (DCSC) web application.

We rely on your support in this certification process to optimize the efficiency and maximize the capabilities of AMSOP.

If you need any further information regarding this matter, please contact Severo Garza at (202) 268-6563.

Edward F. Phelan

475 L'ENFANT PLAZA SW
WASHINGTON DC 20260-7017

INTRODUCTION

The AM SOP Review is to be utilized in all EAS-22 and higher level offices including all subordinate facilities and all Flats Sequencing (FSS) Sites. The unit that has successfully pass the AM SOP Review has achieved a well defined high level of efficiency determined by accomplishments in implementing standardized operating procedures and in successfully demonstrating performance at or above targeted performance factors in Customer Services and Delivery Operations. The achievement for this status requires a high level of commitment and cooperation between Mail Processing, In-Plant Support, Transportation, District Operations Programs Support, and local management.

Mail Processing and Transportation must provide a high level of support to the AM SOP Office documented by an established, comprehensive Integrated Operating Plan (IOP) which includes components for tracking, communication, feed back and problem resolution (*While it is recognized that the resources may not be available to provide this level of support for all similar sized offices, this level of support should be pursued in each AM SOP Office*).

This AM SOP Review Implementation Guide outlines the general parameters and targets which define:

- Stabilizing mail flows
- Increase use of automation
- Designing effective and manageable unit work floors and work flow
- Efficient distribution equipment, carrier equipment and equipment configuration
- Establishing Standard Operating Procedures (SOPs) for supervisor, carrier and clerk processes
- Using data and tools in managing customer service and delivery operations

The *following pages* contain specific targets by operation as well as guidance on how to achieve the targets. The *Guide* also references the Standard Operating Procedures (SOPs) which support the overall AM SOP effort. The ultimate goal of the AM SOP concept is to spread standardized methods and processes to all delivery units, creating exceptional external and internal service while promoting cost efficiency and supporting corporate 24 hour clock targets.

1 AUTOMATION

1-1 DPS Achievement - An AM SOP Office is a unit that has achieved a DPS percent of 85% or higher consistently over the most recent 4-week period. Implementing the following processes will ensure maximum DPS volume. All processes should be running simultaneously.

Partner with the Plant - At the top of the list to boost any Customer Service/District's DPS percentage would be to form a partnership with the servicing Plants. Plant management and craft should be as knowledgeable about DPS percentage goals as Customer Service management and craft. Working with the Plant to insure dedication to running every piece of automation letter mail on the DPS programs, maximizing DPS machine usage, maintaining current DPS programs and maintaining high machine performance levels is critical. Each District should create a dedicated DPS Team incorporating Customer Service and Plant personnel at all levels to get the maximum mileage from all DPS enhancing activities.

Edit Book Review (Red Book) - The first step to increase DPS percentage is a complete review of all City and Rural Edit books. Reasons can be due to a number of factors causing change; such as growth, change in delivery mode, route adjustments, 911 addressing, and others, a carrier by carrier review is required. District Address Management Systems (AMS) should be consulted to assist with this. Carriers may have been focusing on validating addresses alone while accurate information on mode of delivery is also critical. Therefore, in addition to confirming line of travel, address, street name/directional/suffix, secondary address, and 1621 code; carrier knowledge of multiple delivery point addresses and the corresponding letter mail volume should be annotated. This insight can aid in deciding which multiple delivery points need to be physically audited under the "Station Input Review".

Counting Manual Letter Mail - Often over looked, accurate counting of manual letter volume will generate a true picture of DPS percentage. It is ultimately the responsibility of the supervisor to insure manual letter volume is correctly input into DOIS. Manual letter mail must be compressed evenly and measured with a ruler always. Care must be taken not to duplicate the counting of automation holdouts and to insure all NLM is handled correctly. Districts should re-distribute instructions for counting mail at least once a year as a refresher course. Volume Recording for F4 is outlined in Management Instruction, PO-610-2002-3 and F2B is outlined in Management Instruction, PO-610-2000-1.

Station Input Editor (SIE) Review - Whether the site is a CSBCS site or a Delivery Bar Code Sorter (DBCS) site will determine the access and control of Station Input Holdouts. In either situation, it is important to remember only Multiple Delivery Point (MDP) Holdouts are excluded from DPS volume in City delivery. All holdouts are excluded from Rural DPS volume. All holdouts (Change of Address (COA), Temporary Non-Delivery (TND), Non-Delivery Day (NDD), Window Call (WC), and Multiple Delivery Point should be reviewed. In addition to validating holdouts impacting DPS percentage for City delivery, take advantage of increasing carrier efficiency for both City and Rural Delivery. When Station Input is maintained consistently by the guidelines, there is no adverse impact during National Rural count.

Special attention should be given to MDP holdouts. Based on review of the MDP holdout report and carrier input, a physical street audit may be needed. All MDP holdouts for street and high rise defaults should be eliminated where feasible. The deciding test is whether a carrier can affect delivery of non-sequenced secondary addressed mail (i.e. mail coded with the street or high rise default versus the high rise exact) on the street in a reasonably efficient manner. Other holdouts should be reviewed for compliance to guidelines as follows:

- COA – tagged for no longer than 30 days
- TND – tagged for time indicated on the order
- NDD – tagged for business closed day only
- WC – tagged for actual Caller Service customer only

Reject Mail and Unassigned Bin Review - All DPS leakage should be reviewed regardless of source. Reviewing Reject and Unassigned bin trays can be tedious and time consuming, but promotes increased DPS, as well as, customer satisfaction. The good news is dedication and follow through brings results and expedites future work in this area. The first step is to perform a lookup to insure the address on the mail piece is a valid address and in the sort programs. After validation of the mail piece address and analysis of the barcode, mail pieces should be copied and forwarded to the appropriate person for resolution. Other functional areas such as In Plant Support, AMS, Mail Piece Design Analysts, Business Mail Entry, DPS Coordinators and any dedicated DPS Teams are the support behind the local office initiative to identify this leakage. There may be no resolution to some individual mail pieces. It's difficult to impact poor addressing by an individual customer. Mail pieces put in the system by businesses and major mailers will account for most of the successes. Also, it probably will not be possible to review every piece of mail in every reject and unassigned bin tray. However, it is important to dedicate resources to this process daily. Each successful resolution increases the knowledge of the person doing the audit, expedites the next review and increases DPS. The following is a link to an excellent Address Look-up Tool:

Reference:

http//:zip4.usps.com/zip4/welcome.jsp

Electronic Mail Improvement Reporting (eMIR) - When irregularities are found in mailings past the point of acceptance, they should be reported through the eMIR system. Some of these irregularities may be causing DPS leakage. In any event, all irregularities should be reported through the online system. Local mailings can be resolved locally, but should still be input into the eMIR system to provide resolution tracking. National and Premier accounts are handled at the Headquarters level through the Business Service Network once they are input in eMIR.

Backflow of DPS Candidate Mail - It is important to have a consistent backflow of DPS candidate mail to the serving Processing and Distribution Center (P&DC), whether the unit DPS is processed on a DBCS or CSBCS. All incoming dispatch should be surveyed by a Supervisor for disposition. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS, while meeting our service commitments. Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

Carrier Mode of Delivery - It's important to maintain accurate delivery mode (1621 code) on City and Rural edit sheets. DPS sort programs are built on the AMS database. When new deliveries are added or old deliveries are updated with new 1621 codes, AMS should receive the information as soon as possible. Obviously, you can't sort mail to a new address that is not in the sort program, but change of delivery mode updates can also impact DPS significantly. For example, what if you have a 9 story high rise building with heavy mail businesses that changes from door to door delivery to some type of cluster box delivery? What used to be held out of DPS, due to being door to door, can now be included in DPS.

Carrier Route Schemes - Correct, complete street name assignments should be current at all times. In DPS, N Main St is not the same as Main St N. Typically, streets with a directional, with unusual spellings, with initials in the name, with name/number range changes, and numbered streets are candidates for incorrect application on mail pieces. AMS allowed alias street names are one way to overcome poor customer addressing. Up to date scheme books should be available in the Delivery Unit at all times.

Missent, Missort, Missequence (MMM) - Generally, Missent pieces are bad barcodes, Missort pieces are machine errors, and Missequenced pieces are a machine problem unless the same mail piece is being missequenced constantly. An AM SOP Office must have a dedicated 3M case for carriers to deposit DPS errors returned from the street. A daily communications process with the plant to share problems found should be part of the IOP process addressed in Chapter 2

of this guide. A supervisor or designated knowledgeable craft employee will review this mail on a daily basis.

Electronic Un-coded Address Reporting System (eUARS) - eUARS are generated when a customer submits a change of address with a new address that cannot be matched to a ZIP+4 in the Address Management System (AMS) database and when un-coded Address Element Corrections are created through Memphis. Postmasters and Customer Service Supervisors must check the eUARS site regularly to edit/correct elements of the submitted address to allow matching to the AMS database. Corrections may be as simple as correcting a directional or may initiate adding a new street to an edit book. Clearing eUARS guarantees automation compatible forwarding addresses and customer address lists. District tracking of eUARS not cleared in a timely manner insures compliance.

Delivery Sortation Management Automation Research Tool (DSmart) - DSmart is a new online Intelligent Mail and Address Quality (IMAQ) tool implemented this fiscal year identifying DPS leakage based on the number of "hits" of individual barcodes on live mail falling out of DPS from DBCS and CSBCS final pass. Each eleven digit barcodes not falling in DPS totals and rolls to the appropriate report. Reports may be pulled by 5-digit Zip Code, desired time frame, and threshold volume and include the carrier route id for ease of use. Types of reports are as follows: 1) *Potential Missing Delivery Points, High Rise Analysis*, 2) *Potential Street to High Rise Coding Opportunity, 3) New DPF High Rise Zip +4*, 4) *No/Low Volume*, 5) *Business Names*. Each report is an aid to improving DPS percentage. Some of the reports can be easily resolved and others require research and/or carrier input. Training and reports are available online at:

Reference:

http://dsmart.usps.gov/. Your login for DSmart is your ACE login.

All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

1-2 Backflow of Automation Compatible Mail - It is important to have a consistent backflow of automation compatible mail to the serving Processing and Distribution Center (P&DC), whether the unit's DPS is processed on a DBCS or CSBCS and the unit's flats are processed on AFSM or FSS equipment. All incoming dispatch should be surveyed by a Supervisor for identification and separation of automation compatible mail before it is sorted in manual distribution or reaches carrier cases. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS and all 5-digit automation compatible flats carrier-routed on the AFSM or in FSS, while meeting our service commitments. The placard used to return the mail to the plant should indicate the color code that was on the mail when it arrived in the delivery unit.

Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

1-3 Mail History Tracking Reporting System - This report is to be run by the supervisor/manager every day no later than 30 minutes after first available and the errors are to be shared with the appropriate carriers. Carriers then must pull the DPS errors out of their DPS trays and either case the mail or return the mail to the hot case for distribution to the correct route.

The report can be pulled by typing "MHTS" on the blue page or at the following website link: http://mhts/mhts/index.html. If you have problems with the website or report call (703) 207-7297 or send an e-mail to: mhtshelp@nortelgov.com

2 INTEGRATED OPERATING PLAN (IOP)

2-1 S999 Mail - All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. See 2-5 of the Implementation Guide.

2-2 IOP - The IOP is a contract between the mail processing plant(s) and the delivery unit. A signed copy must be on file in the Delivery Unit. The contract covers the mail arrival from the plant and identifies the product of mail agreed upon for each individual trip. The primary purpose of having an IOP is to stabilize mail flows. Each District must have an IOP Coordinator who serves as a valuable resource in setting up mail arrival contracts between the delivery unit and the plant. The mail product agreed upon for each dispatch from the plant to the delivery unit must be conducive to the unit's mail flow needs. The current dispatch schedule must be posted in a prominent place on the receiving dock. IOP is an integral part of the F4 Business Plan, On-Site F4 Reviews, AM SOP, and 24 hour clock goals. The mail arrival profile is critical in establishing appropriate staffing and reporting times.

2-3 DOIS Recording of Arrival Times and volumes - The IOP contract must be current and must be adhered to by all parties. DOIS version 4.3 or higher provides the necessary capability to track and monitor compliance with the IOP. The portion of the IOP contract showing truck schedules and the product of mail that should be on each truck must be posted. The IOP contract information showing truck arrival times and percent of AM Total Mail on each trip must be entered into the DOIS "Maintain Dispatch Information" screen. The trip that has DPS, Automated Carrier Route Flats, and Automated Carrier Route Letters must also be noted in this screen. The unit must track the amount of volume received by trip and record the actual time of arrival.

Trip information for delivery unit operations must be entered in the DOIS "Capture Daily Dispatch" Screen. For each trip enter:

- The actual arrival time of the trip
- Confirm arrival of DPS
- Confirm arrival of Automated Carrier Route Letters
- Confirm arrival of Automated Carrier Route Flats
- Volume of working letters, flats, and parcels
- Volume of automated volume received.

Trip information for all carrier routed mail received from the plant that bypasses F4 processing must be entered into DOIS by trip including the arrival time. This can be entered on the DOIS "Capture Mail Volumes – Manual" screen or on the "Capture Mail Volumes – DCD" screen. The volume taken to carrier routes that is withdrawn should be entered as "Withdraw" in DOIS. DPS and Automated Letter and Flat volumes will automatically be attributed to the trip assigned in the "Maintain Dispatch Information" screen.

2-4 Communication Channel - If variances between the IOP and the actual performance exist, the responsible management partners must provide the necessary feedback and take the necessary actions to address these variances with the partners. The DOIS "Unit Distribution Volume Feedback Report" identifies late trips, and variances from the IOP in the amount of working / automated mail received on each trip. Use this report as the basis for following up with the plant to address these variances. The DOIS "Unit Volume Feedback Report" identifies routes that do not receive 80% of caseable mail by the carrier's start time.

2-5 Mail Arrival - The IOP must be based on the valid requirements for mail arrival at each delivery unit. Some valid requirements include:

- Transportation from the plant to the delivery unit on time 95% or better
- Containers properly labeled and placarded
- Separation of First and Standard (A) flats to the maximum extent possible

- Mail mix (Unit Distribution %) on the Pre-DOV/DOV as negotiated by the Lead MDO and the Postmaster/Station Manager
- Mail flow i.e. arrival time of DPS, arrival of auto letters and arrival of auto flats
- DPS Rejects on top of the appropriate container
- Deviations from the contract will be preceded by a phone call from the Plant

2-6 DPS Processing - Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

2-7 Automated Flat Separations - The IOP must include a commitment by mail processing to make a minimum of 4 distinct rolling stock container separations for automation carrier route flats. Automation flats are spread by Function 4 to the carrier cases and either ledge loaded or placed in carrier Fibredomes prior to the carrier reporting times. In order to minimize re-handling of carrier route flat tubs by Function 4 and to allow the clerk(s) to complete the spreading in a timely manner, the Function 1 Mail Processing Flat staging and dispatch operations must be optimized to efficiently support this Function 4 task.

The following steps are recommended in order to implement this process:

- A designee from In-Plant Support (typically an Industrial Engineer) works with local management of the AM SOP Office to identify the optimum separations for each container of flat trays based on the physical layout of the carrier cases and the existing automation sort plan.
- In-Plant Support revises the automation sort plan for implementation of the desired separations in a manner that simplifies instructions for the machine operators. For example, to make 4 separations for a unit that has both city and rural delivery and the carrier cases are physically aligned in numerical sequence, consider placing the low numbered city routes and low numbered rural routes on one side of the machine and the high numbered routes on the opposite side. Two containers would be placed at the end of each side of the machine, one for city and one for rural. PO Box sections and Firm Callers could be placed on opposite sides to provide two additional separations where warranted.
- In-Plant Support develops an SOP (sample attached) and proposed container placards and shares it with the AM SOP Office local management for review and concurrence. The AM SOP Office develops an SOP for spreading automation carrier route flats (sample attached) and shares it with In-Plant Support for review and concurrence. The AM SOP Office, SOP for spreading automation carrier route flats should include procedures for spreading and stacking CR Presort bundles at the unit, also.
- In-Plant Support should train the machine operators and appropriate SDO(s) and MDO(s) on the revised dispatch process and implement the revised sort plan and dispatch procedures. The AM SOP Office should train the Function 4 clerks and implement the revised automation carrier route flat spreading SOP.
- Revise the IOP to include the agreed upon separations and dispatch particulars for automation carrier route flats.
- Because of business or other operational issues, this question could be answered N/A.

3 CLERK OPERATIONS - FUNCTION 4

3.1 AM Accountable - This operation has a significant direct impact on the carrier operation through the sorting and assigning accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. Accountable items must be available for the carriers in a timely manner so as not to delay the carrier's departure to the street. As little carrier time as possible should be used in this operation, so it is highly recommended that a mobile accountable cart operation be used. The accountable

cart must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details

3-2 PM Accountable - This operation has a significant direct impact on the carrier operation through the clearing of accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. When the carriers return from the street, an efficient clearance process that allows for clearance as soon as the carrier returns to the office with minimal or no waiting time is desired. The accountable cage must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details.

3-3 Distribution Cut Off Times and Distribution Expectations - Mail up times should be established and posted in each manual operation, including PO Box mail and CSBCS operations, reflecting finalization of mail in the order of flats, letters and then parcels/SPRs. Up times must effectively support the earliest carrier leave time and be supported by the IOP. Supervisors should make accurate assessment of all workloads and appropriate assignments. At the final incoming dispatch, Supervisors should re-evaluate assignments to insure finalizations of all mail types to meet Delivery needs. Actual work hour variance should be calculated daily and used to evaluate operations and make management decisions.

An efficient LDC 43 operation is critical for an AM SOP Office. All mail types (letters, flats, parcels/SPRs) must be sorted at a rate equal to or greater than the distribution expectations published in Automation Workforce Planning System (AWPS) and as re-stated in the Function Four Business Plan. All unit up times and distribution expectations must be communicated with all F4 personnel.

Distribution Expectations

Letter Mail Distribution

Separations	Foot Per Hour	Pieces
00-20	9.5	2157
21-35	9	2043
36-49	8.5	1930
50-63	7.75	1759
64-77	7	1589
78-84	6.26	1419
85-999	5.5	1249

Flat Mail Distribution

Separations	Foot Per Hour	Pieces
0-20	11.75	1,351
21-35	11.25	1,294
36-49	10.5	1,208
50-63	9.5	1,093
64-77	8.75	1,006
78-84	7.75	892
85-999	6.75	776

National Container Conversion Rate for Containers

	Full	3/4	½	¼
#1 Sack	8.79	6.6	4.4	2.2
U-cart	12.31	9.23	6.2	3.1
Gurney (1033)	15.27	11.4	7.6	3.8
Hamper (1046)	39.7	29.8	20.0	10.0
GPMC/APC/ERMC	102	76.5	51.0	25.5
Over the Road (OTR)/BMC	261	195.8	130.5	65.2
Wire Container	118	88.5	59.0	29.5
Extended hamper	65	48.75	32.5	16.2
WestPak/Gaylord	261	195.8	130.5	65.2
Outside Pieces	Actual count			
Destination Delivery Unit (DDU)	Actual count from PS Form 8125, Plant-Verified Drop Shipment (PVDS) Verification and Clearance			

NOTE: Parcel container conversions currently include SPRs. Do not initiate a second handling to achieve a separate piece count for SPRs. This applies to Function 4 parcel post volume recording, not Function 2.

3-4 Empty Equipment - The workroom floor must be clear from excess, empty equipment. As clerks spread mail, empty equipment must be removed and placed in containers for return to the plant in a timely manner. All labels must be removed from mail transport equipment, whether, trays, tubs or rolling stock when the equipment is emptied.

The disposal of empty equipment returned from the street is the responsibility of the carrier. Many carriers reuse equipment daily such as hard plastic trays. These are typically retained overnight at the carrier case. Excess letter carrier equipment to be returned usually consists of DPS letter trays. Empty equipment containers must be pre-positioned in the carrier's line of travel for the carrier to deposit excess letter trays and other commonly used equipment upon their return from the street.

References:

POM Section 58 – "Mail Transport Equipment Handling Policy";
Website link: http://blue.usps.gov/delret/L4CustServSupp_Function4.html

3-5 National Color Code Policy - Supervisors must train all F4 personnel on the procedures of the National Color Coding Policy and ensure compliance for working manual F4 volume and spreading F2 volume. Obtain a copy of the National Color Code Policy at the following website: http://blue.usps.gov/opsplanning/colorcodeqa.htm and refer to Postal Operations Manual 458.34 at the following website: http://blue.usps.gov/cpim/ftp/manuals/pom/html/c4_029.htm.

3-6 SOP ***Sample Mail Spreading SOP for Function 4***

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:

- ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).
- ALL mail with any future day's color code shall be placed on the floor on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- All mail will be placed neatly as close as possible next to the case legs.
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats

- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.
- ALL labels are to be removed from empty equipment.

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) or on the floor if no fibredome. AFSM Standard mail is assumed to be for today's delivery. All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse.

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) or on the floor if no fibredome after the flats have been measured by the supervisor/manager.

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker.

3-7 Function Four Volume Recording - Daily volume and productivity reporting must be established and displayed. Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009, accessible at the following website:
http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

F4 Volume Recording

- Accurate volume recording is essential.
- The designated employee must measure with a ruler, tape measure or yardstick.
- Compress mail in a consistent manner.
- Record linearly and round to nearest quarter foot.
- Volumes are entered onto the preferred form (PS Form 3930).
- Conversions to pieces must utilize current pieces per foot conversion rate.

F4 Volume Not Recorded

- Carrier-routed volumes generated from automation operations.
- Direct bundles and trays/tubs
- Mail being riffled to check for errors
- Accountable items

Presort Letters And S999 Mail

- When possible presort letters should be back flowed to the DPS operation.
- Spread non-machineable presort and S999 mail directly to the carrier case
- Do not record volumes for S999 mail.

Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009. The Management Instruction (MI), PO-610-2009-1, Function 4 Standardized Customer Service Workload Reporting System contains the national policies and procedures for recording and reporting Function Four workload. To obtain a copy of the Management Instruction go to the following website:

http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

3-8 - Reserved

3-9 - Reserved

3-10 Staging and Spreading Mail - Setup, staging and spreading of all mail types must be accomplished so that mail is presented to the carriers in a timely manner to insure delivery is able to maximize efficiency in office and street duties. All manual letters and flats must be spread by F4 personnel, reducing or minimizing carrier withdrawal time

Pulldown is the withdrawal of mail from distribution cases in preparation for spreading the mail to carrier cases. Efficient pulling ensures improving the flow of mail and enhancing distribution. Carrier withdrawal of letter and flat mail should be eliminated wherever local conditions permit. The work hours used to pull, withdraw and spread mail is greatly minimized through the use of rolling stock. Therefore, rolling stock should be considered in every office where space permits.

3-11 Flat Mail placement at Carrier case - Flats are to be either ledge loaded or placed in Fiberdome. Significant improvements in city and rural carrier performance as measured by percent to standard can be expected where clerks either ledge load or place in Fiberdomes carrier routed automated flats or presort flats in lieu of the more traditional method of simply stacking automated flat containers at the carrier cases and allowing each carrier to unload the flats and handle the empty flat trays. Refer to 3-10 of the AM SOP Implementation Guide.

Manual flats are to be measured by the supervisor prior to the clerk spreading the flats to the carrier's case.

NLM must be stacked in such a way to facilitate accurate measurement by the supervisor while ensuring the separation of NLM and linear measured mail. All mail must be arranged to allow ease of identity of current days' mail while maintaining correct color coding. Refer to 3-4, 3-5, and 3-10 of the AM SOP Implementation Guide.

3-12 Mail On Time To Carriers - The timely arrival and subsequent spreading of flats at the carriers' case is crucial to the success of an AM SOP Office. A key target is to have 80% of all caseable mail available at the carrier cases and all associated empty equipment including any flat tubs or letter trays removed from carrier casing areas prior to scheduled carrier reporting times.

Refer to Section 2 IOP of the AM SOP Implementation Guide for resolving mail arrival concerns. Refer to 3-3 of the AM SOP Implementation Guide for distribution expectations and posted cut off times within customer service operations.

Carrier start times must coincide with 80% of caseable mail being available at the carriers' cases.

3-13 Full Coverage Mailings (Walk Sequence) - Walk sequenced mailings should be isolated by Function 4 employees and placed in Parcel hampers so mailings can be taken directly to the street without further handlings. Mail should not be bundled prior to leave time, unless it is stated in the local agreement. An exception to this process is non-motorized routes which must be bundled out prior to relay delivery cut-off.

Walk sequence volume is defined as letters or flats in sequential order delivery in accordance with the Red Book and the case labels. Sequence volume is not necessarily volume for every delivery, it is mail merely in delivery order that typically covers a significant majority of the residential deliveries. Sequence mail on Foot and Park & Loop delivery must not be cased unless more than one set of requested in-home dates. If more than one set is received, curtailment of any additional sets is the preferred option. However, if more than one set of sequence volume must be delivered that day, the carrier on Foot and Park & Loop delivery may case the additional set(s) of sequence volume to meet the three bundle restriction. Carriers on Curbline and Centralized delivery should be directed to carry the additional sequence bundle(s) directly to the street without casing.

If a set of sequence must be cased so as not to exceed the 3 bundles on Foot and Park & Loop delivery, direct the carrier to case the set with the highest casing productivity.

4 CUSTOMER SERVICE/DELIVERY FLOOR LAYOUT

4-1 Equipment - Case layouts and cell assignments must be reviewed and optimized for efficiency and standardization. Secondary cases for PO Box sections and Window Callers should be eliminated except in extremely unusual circumstances.

A primary letter case 49 cell open back is preferred (and wing if needed) To determine the appropriate number of letter set ups the following formula is to be used: Using a 12-month SPLY analysis of letters to obtain a daily average. Divide SPLY total actual letter pieces by 302. Divide this figure by the office's AWPS letter expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for letter distribution (open to last call) = Number of letter distribution set ups required (round up to nearest whole number).

Rolling stock should be utilized for primary and secondary flat distribution wherever possible. APCs with shelf inserts utilizing three sided cardboard flat trays or Flat Tote Racks utilizing 775 Flat Trays should be used. To determine the appropriate number of flat set ups the following formula is to be used: Using a 12-month SPLY analysis of flats to obtain a daily average. Divide SPLY total actual flats pieces by 302. Divide this figure by the office's AWPS flat expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for flat distribution (open to last call) = Number of flat distribution set ups required (round up to nearest whole number).

Each distribution operation will have an area dedicated to breaking down and/or staging carrier routed bundles, mixed mail containers, etc... into their smaller constituent parts in preparation for distribution to carrier cases or other distribution operations. This area should normally be in an area near the loading dock doors.

Distribution of parcel post is made from incoming containers to large hampers (1046). In some isolated instances where volume is very low year round a small hamper (1033) can be substituted. Where space permits the hampers are to be placed in a "U-shaped" configuration

where the incoming container of parcels is pulled into the center of the "U" for distribution. Hampers are normally placed two to three deep and the distance is such that the distributor is able to lightly toss most parcels into the hamper from in front of the parcel container. The goal is to finalize all parcels with a single handling. Also, the carrier parcel hamper area should be located to facilitate an unencumbered pathway to and from each carrier case and the distance minimized to the extent possible.

Small parcels (SPRs) are received in various containers and may arrive in the unit co-mingled with parcels. SPRs can be sorted in several ways as follows:

- Flat Tote Rack - Flat Tote Racks can be used for sorting SPRs. These racks come in various sizes; the most common size is 20 tubs per rack. SPRs are tossed lightly into the flats tub. When sorting is finished, the racks can be rolled to the carriers cases to spread the tubs of SPRs.
- Flat Tubs on floor in front of 1046's – Distribution of SPRs can be accomplished to flat tubs by placing the tubs on the floor in front of the 1046 hamper set-up. This provides the ability to sort mixed parcels and SPRs at the same time eliminating double handling when two set-up's are used. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs are loaded into the 1046's for distribution to carriers.
- Flat Tubs attached to 1046's – An option to the above process of distribution of SPRs to flat tubs identified above is to affix flat tubs to hampers with "S" hooks attached to the top rail of a 1046 hamper or to use special plastic bins available through the Material Distribution Center that have a bracket that affixes to the top rail of a 1046 hamper. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs remain in place for distribution to carriers.

4-2 Supervisors Workstation - The supervisor's desk or workstation should be located in an area that allows maximum visual coverage of the workroom floor without impeding operations. Consider location of electric, phone and data port outlets.

4-3 Outgoing Mail Staging Area - Generally this setup should be located near the back dock. Proper set ups with placards for separations as noted in the unit IOP are mandatory. See M-39, 117.1e.

4-4 Throwback Case - Case should be labeled per M-39 Exhibit 126.13 as found at page 28 of:

http://blue.usps.gov/delret/_pdf/m39.pdf

4-5 DPS Staging Area - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles.

4-6 Vertical Flat Memorandum - The preferred shelf configuration is the 5 shelf case. Additional information can be found in the M-39 sec 121:

http://blue.usps.gov/cpim/ftp/hand/m39.pdf

Additional info can also be found in the VFC MOU:

http://blue.usps.gov/delret/L3do/city/AM SOP/VFC.pdf

4-7 Hot Case - The hot case should be painted or labeled in a distinct fashion to facilitate easy identification and located in the carriers' line of travel to their exit.

5 CITY DELIVERY – FUNCTION 2B

5-1 Office Percent to Standard - Percent to Standard is determined by dividing actual office hours by the standard office hours. Standard hours are determined by applying the current office time standards (18 / 8/ 70) plus Fixed Office Time (FOT) to the volume for the period in question. By using less hours than standard (Percent to Standard below 100%), the office will show that they are working at a high efficiency level. The effective use of DOIS as well as matching work hours to workload will enable the office to achieve the expected savings.

5-2 Deliveries Per Hour - Deliveries Per Hour (DPH) is cumulative deliveries divided by total city delivery work hours (LDC 21-24, 26-29, & 92) over a given time period. Cumulative deliveries are possible deliveries totaled over the same given time period. The office must be meeting the current FY percentage improvement over SPLY. This goal is an overall effectiveness measurement for each office. The ability to manage both office and street functions simultaneously with the tools and methods described in the AM SOP Implementation Guide for office and street duties will enable the unit to achieve this goal (See sections 5-3, 5-7, and 5-8).

5-3 Managed Service Points (MSP) - MSP is a tool designed to monitor delivery consistency and enhance street management processes. Using this tool, local managers are able to review carrier street performance on a daily basis as they evaluate the consistency of arrival at pivotal locations along a route's line of travel. It also provides a comparison of expected intervals established by route inspection data verses actual performance as well as loading and travel times to and from the route. Carrier AM office time has been historically decreasing as a result of operational changes such as increased DPS, increased processing of flats on automation, IOP implementation, IOP compliance tracking and, in some cases, across the board volume decreases. With more of the average carrier's day being spent on street delivery and with the advent of delivery sequencing for flats, there is a critical need for effective and consistent use of MSP information in daily delivery operations.

A key tool is the MSP Route Report which computes the time difference between actual and scheduled scan times. The time difference, known as 'gap' time, is the variance between the scheduled scan time and the actual scan time for each scan point on the route. As carrier AM office time decreases, the time of the first scan trends to be earlier. The 'gap' time for the route should be maintained throughout the day unless there is a known and approved cause for a change of that time such as pivoting, vehicle breakdown, authorized deviation, etc. It is critical that Postmasters and Mgr., C/S Operations review the MSP Route Report on a daily basis to identify individual routes that show significant variances in 'gap' times. Once the routes are identified, the Postmaster or Mgr., C/S needs to discuss the routes and the 'gap' time variances with the delivery supervisor for follow-up. Local management should plan their street supervision activities to include street supervision for those routes at the times and locations where the significant 'gap' time variances occurred (+ or -) absent known or approved cause.

Supervisor should ensure accurate AVUS records on a daily basis. Daily review of employee vehicle scans including mileage, vehicle and route numbers to ensure accuracy and completeness of entries. The Vehicle Utilization Daily Report should be printed and reviewed to verify accuracy of the all entries. Supervisor should annotate any mileage deviations (usually 2 or more miles +/-) with the reason for the deviation. This report can also serve as a reference when discussing individual carrier performance. All Reports with annotations should be kept in case of potential corrective actions.

5-4 Carrier SOP - Each office should develop a Carrier SOP based on their particular operation. These guidelines will serve as the basic set of instructions for all carriers to follow through the course of the work day. It is vital that all carriers and supervisors are familiar with these guidelines and fully understand the entire process. Careful thought should be given to the SOP and it should not be just a re-hashing of sections from current manuals and handbooks. The SOP

should direct carriers in the order in which they are to perform tasks during their office and street duties. Examples of items to be included in an SOP are:

What to do immediately upon clocking in
When to perform vehicle inspection
When (if at all) withdraws will be made
How and when carrier will obtain parcels
Loading/ Unloading Procedures
No empty equipment is to be left in vehicles
Collection mail procedures

SOPs must be readily available to all effected employees at all times to serve as a reference and a training tool for new employees. It is suggested that a copy of the current SOP be placed in each carrier's route book and displayed on the workroom floor in a manner to allow for easy reference.

5-5 DPS Mail - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles. NOTE: DPS mail for foot routes is to be tied out and placed in relay sacks.

5-6 Daily Management Team Checklist - A daily management checklist is essential to ensure that all requirements of effective supervision have been both performed and completed timely. Postal supervisors have numerous tasks that must be completed daily and it can be easy to have one or two slip and be forgotten as supervisor's attention is pulled by operational situations. By using a checklist, it can remind the supervisor about their assigned duties as well as provide the PM/Manager a reference to review to make sure nothing has been missed. The checklist should be used by multiple supervisors over the course of the day as supervisor's shifts overlap the carrier's day.

A sample checklist is available at the AM SOP web page:
http://blue.usps.gov/deiret/_zip/sup_pm_mgr.zip

5-7 Management Instruction - Just like carriers, unit management will need a set of guidelines to ensure that all required functions are completed timely. This Management SOP and the Daily Management Checklist should compliment one another.
Task assignments should be shared among all management team members.
The management SOP and Checklist will vary in the detail provided in each document. The checklist should be a short phrase to explain the task to be completed; the SOP should provide some detail explain the task to be completed.
Daily management tasks that should be included as part of the SOP include:

Prior to Carrier Report Time

Record any unscheduled absences for the day, make schedule adjustments as necessary

Logging into TACS, reviewing and correct any employee clock ring errors, entering missing leave, review of un-authorized Overtime, penalty overtime or guarantee time or unauthorized tour deviations; and printing of appropriate reports. Entries should be made to 1017A or 1017B as appropriate and placed aside ready to discuss with employees after they report to work.

Log into DOIS and review time records for missing time and correction of DOIS clock ring errors. A DOIS clock ring error can be different from a TACS clock ring error. It may be necessary to re-enter TACS to make corrections to TACS rings once DOIS is reviewed.

Once all TACS and DOIS rings have been reviewed and corrected, the following reports should be printed, reviewed and annotated as necessary:

1813- Late Leaving/Returning Report

Route/Carrier Daily Performance Report
Unit Daily Performance Report
Unit Daily Feedback Report
Review of previous days 3996s and 1571s for accuracy and compliance with instructions

Accurate measurement of daily volume (MI-PO-610-2007-1), proper color coding and timely entry into DOIS. Weblink site is http://blue.usps.gov/cpim/ftp/manage/p6102007.pdf Workload Status Report should be printed each time new volume is entered either via DCD or manual entry.

Log into MyPO and pull hold orders, re-deliveries and service issues as necessary.

If available, pull MHTS Reports and take appropriate action as necessary.

After Carrier's Report to Work

Ensure that time card badges are secure, then available for the proper time frame (5 minutes prior to and 5 minutes after scheduled begin tour).

Discuss with each carrier their individual prior day's performance using previously printed reports, 3996 etc., and discuss expectations for today based on workload, MyPO issues, etc..
You should document waiting time as appropriate using local spreadsheet or by instructing employees to make proper clock ring in TACS, and follow up to ensure compliance.

Discuss previous day performance with PM/manager using previously printed reports and discuss expectation for current day based on workload including street supervision.

Finalize expectations with carriers upon completion of distribution.

Initial CSDRS report.

Observe pull down and vehicle loading.

While Carriers are on Street

Street Supervision based on MSP report discrepancies from previous day, scheduled 3999s, area or district street supervision requirements, etc.

Read/respond to message activity.

Update CSDRS as necessary.

During PM Office Time

Monitor unloading / collection procedures.
Initial of review TACS rings including proper end of tour rings, unauthorized OT etc.
Monitor Accountable clearance and cage procedures.
Handle any unexpected situation and update workload assignment changes.
Measure, record and monitor PM casing.

These are examples and by no means an exclusive list. Your operation may require additional items and additional sections to be included in your SOP.

5-8 Daily Street Management and MSP Review - Street management is to be conducted daily by all delivery supervisors in the office. Management focus is based upon safety, issues highlighted by MSP reports, customer driven concerns, and time used in excess of authorized

street time. Each office should have a street management book containing tools appropriate for the use of the supervisor.

Tools for the city supervisor include a complete current 3999 for each route, blank PS Form 4584 – Drivers Observation, PS Form 1564-a, AVUS Vehicle assignment report, route maps, unit pivot plan, a Data Collection Device (DCD) loaded with the Route Inspection Program and a 3999-X to be used in compiling an annual updated 3999 for each route.

Tools for the rural supervisor include 4003s for each route, route maps, unit pivot plan, AVUS vehicle assignment report, blank PS Form 4584s and blank paper for taking notes on new streets, houses, etc. The supervisor should be alert for road construction causing potential detours, potential safety issues, vacant houses and carrier performance. Some guidelines supervisors should keep in mind while observing carriers on the street include:

- Perform street management daily
- Take Arrow Lock Key on street if neededl
- Monitor growth areas for change
- Always keep carrier route safety in mind.
- Complete 4584's as the opportunity arises for quality observations
- Review 4003's on street for correctness, safety, growth
- Observe street delivery performance. Are they fingering mail? Are they dismounting for delivery of parcels/accountables? Time deliveries per minute and notate

While the supervisor is on street management, they should observe and document the actions of the carriers on the street. If driving practices were observed, PS Form 4584 should be completed. After conducting driving and street observations, the supervisor must provide timely feedback to the carrier on any safety or productivity issues that they may have observed.

References:

AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide
Delivery & Retail Headquarters website at http://blue.usps.gov/delivery/city/am_sop.htm
M-39, Management of Delivery Services, Section 134

5-9 Pivot Plans - Pivot Plans are vital tools for use when it is necessary for routes to be carried by multiple carriers in order to meet delivery requirements and objectives. The reason for pivoting the route may be to capture under time or to ensure delivery when your operation is short staffed. Specific information on how to develop pivot plans is available through the DOIS Documentation at:

http://blue.usps.gov/delret/L3do/dsystems/DOIS/aids/pivot%20plan%20maint.doc/

5-10 Route Book - Specific information on Carrier Route book requirements can be reviewed in M-39 126.5b and M-41 section 25 (including exhibits) at
http://blue.usps.gov/cpim/ftp/hand/m39.pdf

6 DELIVERY OPERATIONS

6.1 Missent, Missort, Missequenced - Missent pieces, (wrong office), are incorrect barcodes, Missort pieces, (right office wrong route), and Missequenced pieces, (right route wrong order), are likely machine errors. The 3M case should be located in the line of travel for carriers returning from the street. The 3M case has three cells dedicated to each route, Missent, Missorted, and Missequenced. The supervisor reviews the mail daily. The supervisor reports

reoccurring errors, the same errors three times within a week, in CDRS or local policy. Corrective action should be taken by the Plant or CSBCS or DBCS office.

6-2 Hold Mail - Vacation Hold mail is to be retained at the carrier case. This hold mail should be stored in marked trays under the carrier's case. A uniform vacation hold mail policy, consistent with POM requirements is developed by the Postmaster/Station Manager and communicated to all employees both delivery and clerical, and enforced evenly with all customers. The customer must supply the request in writing, preferably through the web form or through PS Form 8076 "Authorization to Hold Mail".

For long term holds and "Snowbirds", Premium Forwarding Service should be encouraged. Premium Forwarding Service customers should be treated as holds and held at the carrier case. Every Wednesday, a designated employee other than the carrier should package this mail. The package is then sent to the customer via Priority Mail.

Reference: http://blue.usps.gov/cpim/ftp/manuals/pom/pomtc.pdf
Hold mail procedures are discussed in the Postal Operations Manual, POM 611.9.

6-3 Carrier Case Labels - Case labels should be neat and orderly. Nothing is hand written on the labels. Confirm the case labels with the Edit Book. Pull the current 3999 and 1564A from DOIS (Supervisor Work Bench) for the routes to be observed. Verify the line of travel is identical to the 3999. Substantiate the park points and relays have been minimized (1564A).

Each relay is identified by a number on the label of the letter separations. The number is placed under a diagonal line directly under the first street number of the relay to be served.

Route patterns are set up to provide for as few vehicle moves as possible. The ideal location for parking points is at an intersection of two streets where four relays may be carried without the need for a vehicle move. Many variations are possible depending on mail volume, terrain, curb line boxes, traffic, safety, average lot frontage, and eliminating deadheading.

http://blue.usps.gov/cpim/ftp/hand/m41.pdf (Section 323.21 & 221.5)

6-4 Hot Case SOP and Case Cards - Monitor the distribution and missort mail to delivery personnel to ensure that all current days' mail is delivered the same day. The office must have a Hot Case with the Hot Case Card System. Missort mail is to be directed to the Hot Case or throwback case by function four after the Missort mails is collected from the carrier cases. A Hot Case cut-off and clearance time must be established for the office and prominently posted. Cut-off times must be coordinated with current carrier scheduled leaving times. Carriers must comply with Section 291, Handbook M 41: withdraw preferential mail from the Hot case when leaving for their route. The carriers must place a red Hot Case card into the letter and/or flat holdouts for their respective routes.

6-5 Carrier Collection Mail - City carriers should make every attempt to separate out mail in containers as it is collected from customers, whether on the route or on dedicated collection runs. At a minimum, the carrier should separate Express Mail, Priority Mail, small parcels and Target Mail from ordinary collection mail. It has been shown that if the carrier consistently uses the same container system daily it becomes second nature, requiring minimal or no additional time by the carrier/collector.

Rural carriers cannot be required to make more than two separations without additional compensation. For this reason, it is suggested that rural carriers make two hold outs; collection letters and flats, and Priority Mail. These separations take advantage of the capabilities of the automated facer canceller systems in place in most plants, while expediting the isolation and transportation of Priority Mail to the appropriate location. Under the rural compensation system,

rural carriers are already compensated for handling Express Mail and parcels over two pounds separately.

The Integrated Operating Plan (IOP) should specify the mail preparation requirements of each office and the percentage of collection mail required to be at the plant prior to 1800 for cancellation. Collection mail must be dispatched to the plant prepared in the manner required by the plant with as much volume as possible on each dispatch. A consistent mail dispatch set up with the required labeled separations must be utilized in every Customer Service unit. All preferential mail should be dispatched on available transportation and not held. The amount of rolling stock dispatched should be minimized based on volume collected. Consolidations may be made, where possible and reasonable, such as consolidating containerized Priority flats and Priority parcels.

Reference:

http://blue.usps.gov/cpim/ftp/hand/po209.pdf

6-6 1700 Goal - A carrier's return time is based upon a combination of their leaving time, the route's street time and any additional street duties assigned to the carrier for that day. The DOIS Work Load Status Report will show the carrier estimated return time based on these factors. The goal is that all carriers return by 1700, based on the estimated time from DOIS. Management needs to match these return times with current transportation for collection mail and make their assignments accordingly to ensure that all carriers are expected back prior to the final dispatch in order to allow processing to meet their cancellations and operational goals. Managing carrier return time starts with office performance in the morning, making sure carriers are leaving when expected based on actual workload; and includes, effective daily street management focused on identified issues from MSP reports, customer identified issues, and previous carrier performance.

References:

For further information, refer to the AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide, available from the Delivery & Retail Headquarters website at:
http://blue.usps.gov/delivery/city/am_sop.htm
Management Instruction (MI) PO -610-2007-1 dated July 9, 2007.

UNITED STATES POSTAL SERVICE

AMSOP

UNITED STATES POSTAL SERVICE

AMSOP Policy Changes for FY 2013

- Certified Facilities are good for 24 months
  - Old certification period was 36 months
- Each Area is required to certify 33% of EAS level 21 and above Facilities.
- Each Area is required to certify all existing FSS sites and all new FSS sites prior to receiving FSS mail.
- Each Area is required to certify twenty five (25) percent of their yearly target per postal quarter. Note, for Quarter Two only 12% certification is required.

AMSOP Audit Changes for FY 2013

- Six questions point value increased.
- Two questions point value decreased.
- Seven questions were revised.
- Thirteen questions were excluded.
- Two new questions added. One new question includes two sub-questions.

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Questions with Increased Point Value

- 1. Is the unit's DPS% and FSS% (FSS sites) achievement meeting or exceeding the nationally established goal for the previous 4 weeks? If the answer is no, what percentage has the office achieved?

  Old Points 4 *New Points* 5

- 20. Are all letters and flats (except for Hot Case Mail) spread by F4 operations minimizing carrier withdrawal?

  Old Point 1 *New Points* 3

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Questions with Increased Point Value (cont.)

- 34. *Is a current Carrier SOP posted in the unit, placed in the route books, clearly understood and followed by the carriers?*
  Old Points 3 *New Points* 4

- 35. Do carriers retrieve all automated mail (DPS & FSS) when departing the office for street delivery?
  Old Points 2 *New Points* 4

- 38. Does the delivery unit have a schedule for conducting street management duties in which a thorough and accurate PS Form 3999 is completed for each route in the office on an annual basis?
  Old Points 4 *New Points* 5

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Questions with Increased Point Value (cont.)

- 36. Is there a '3M'case labeled by route that is utilized with mail reviewed on a daily basis by
  Old Point *1* *New Points* *3*

- 41. Is the unit meeting the 1700 goal of 90% carriers returning from the street for the previous 4 weeks?
  Old Point *1* *New Points* *2*

Questions that decreased in point value

•9. Does Mail Processing stage DPS letters and FSS flats for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit?

Old Point 1 No Value ---

The statement "and FSS flats" will be added to this question.

•19. Has manual letter, flat, parcel and SPR equipment been optimized, minimized, and is the layout appropriate?

Old Points 5 New Points 3

•31. Did the unit achieve Percent to Standard of 100% or less for the previous 4 weeks?

Old Points 4 New Points 3

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- Questions revised
  - 12B. Changed to #12 and to read "Are personnel available and the floor layout proper to allow carriers to clear accountables with minimum congestion and waiting time?"
  - 14. Is the supervisor aware of manual letter, flat and parcel/SPR distribution expectations? Changed to read "Is the unit achieving 95% CSV for the last 4 weeks?"
  - 22. Changed to read "Is 80% of the committed caseable mail placed at or on the carrier case prior to carrier reporting time by Function 4 personnel?"
  - 24. Changed to read "Has manual letter, flat, parcel, and SPR equipment been optimized, minimized, and is the layout appropriate?"

Questions revised (cont.)

- 27. Is the throwback case(s) labeled correctly and in the carrier line of travel to their exit, minimizing carrier movement? Changed to read, "Is the Throwback Case in the carrier line of travel to their exit, minimizing carrier movement?"

- 35. Do carriers take DPS mail directly to the street? Changed to read, "Do carriers take DPS mail, FSS mail in FSS units, and (Sequence mail when possible) directly to the street?"

- 41. Is hold Mail kept at the carrier case? Changed to read "Is the unit achieving 95% CDV for the last 4 weeks?"

Questions excluded

- 3, 3A, & 3B. Is the unit using the Mail History Tracking Report System and is there an SOP in the unit for this process?

- 9. Does Mail Processing stage DPS letters and FSS Flats for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit?

- 12. Does the process to clear accountable items minimize carrier waiting time?

- Questions excluded-Continued
  - 12A. Does the floor layout allow carriers to clear accountables with minimum congestion and wait time?
  - 19D. For mail moving to manual operations from automated operations, is the mail recorded from EOR reports?
  - 19F. Are accountables excluded?
  - 21. Are all available flats either ledge loaded or placed at carrier case prior to carrier reporting time by Function 4 personnel?

- Questions excluded-Continued
  - 24A. Is the amount of equipment appropriate?
  - 24B. Is the type of equipment appropriate?
  - 24C. Is the Layout of equipment appropriate?
  - 29. Is all carrier equipment in compliance with Vertical Flat Case-Memorandum of Understanding and has all casing equipment been minimized?

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- Questions – Added

  - Is the Mail Arrival Profile (MAP) in the Scheduling and Staffing Tool (SST) current and correct?

    - Sub-question of above, "Is the parcel distribution operation staffed properly during A.M. distribution to avoid carrier waiting time."
    - Sub-question of above, " Has the unit met the interim Target set for CSV % Achieved during the last four weeks

  - Is volume recorded and entered into CSAW by Trip?

UNITED STATES POSTAL SERVICE

FSS Sites	Required	Completed
Capital Metro	120	63
Eastern	100	122
Great Lakes	119	40
Northeast	262	83
Pacific	118	57
Southern	51	56
Western	78	33
National	848	454

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Non FSS Sites Level 21 and above	Required	Completed
Capital Metro	140	33
Eastern	214	69
Great Lakes	217	76
Northeast	224	62
Pacific	254	36
Southern	312	272
Western	293	85
National	1654	548

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UNITED STATES POSTAL SERVICE

Time Limit Extension

Informal Step A X

Formal Step A _____

Appeal To Step B _____
(Check One)

The parties mutually agree to extend the time limits on the following Informal/Formal Step A Grievance(s) or appeal to Step B until the following date 9/15/2014.

Grievant(s) Name/Class class action concerning placing mail on floor

This Grievance Number _____

Local Grievance # _____

U.S.P.S. Representative 9-8-14 Date

Corey T. Walker 9/8/2014
NALC Representative Date

NALC – USPS Guidelines for Administration of Informal and Formal Step A
April 6, 2005

PowerPoint slides 15-18

Article 5 – Prohibition of Unilateral Action

Management is prohibited from taking any unilateral action inconsistent with the terms of the existing agreement or its obligations under law. Section 8(d) of the National Labor Relations Act prohibits an employer from making unilateral changes in wages, hours or working conditions during the term of a collective bargaining agreement.

Past Practice

The following explanation represents the national parties' general agreement on the subject of past practice. The explanation is not exhaustive, and is intended to provide the local parties general guidance on the subject.

The local parties must insure that the facts surrounding a dispute in which past practice plays a part are surfaced and thoroughly developed so an informed decision can be made. While a past practice that is inconsistent or in conflict with the National Agreement is not binding, Article 5 may limit the employer's ability to take a unilateral action where a valid past practice exists. While most labor disputes can be resolved by application of the written language of the Agreement, it has long been recognized that the resolution of some disputes requires the examination of the past practice of the parties.

Defining Past Practice

In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice:

First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.

Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.

Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct. Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.

One must consider, too, the underlying circumstance which gives a practice its true dimensions.

A practice is no broader than the circumstances out of which it has arisen, although its scope can always be enlarged in the day-to-day administration of the agreement. No meaningful description of a practice can be made without mention of these circumstances.

For instance, a work assignment practice which develops on the afternoon and midnight shifts and which is responsive to the peculiar needs for night work cannot be automatically extended to the day shift.

The point is that every practice must be carefully related to its origin and purpose.

Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality.

Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.

Functions of Past Practice

In the same paper, Arbitrator Mittenthal notes that there are three distinct functions of past practice:

To Implement Contract Language

Contract language may not be sufficiently specific to resolve all issues that arise. In such cases, the past practice of the parties provides evidence of how the provision at issue should be applied.

For example, Article 15, Section 2, Step 3 of the 1978 National Agreement (and successor agreements through the 2000 National Agreement) required the parties to hold Step 3 meetings.

The contract language, however, did not specify where the meetings were to be held. Arbitrator Mittenthal held that in the absence of any specific controlling contract language, the Postal Service did not violate the National Agreement by insisting that Step 3 meetings be held at locations consistent with past practice. (N8-NAT-0006, July 10, 1979, C-03241)

To Clarify Ambiguous Language

Past practice is used to assess the intent of the parties when the contract language is ambiguous, that is, when a contract provision could plausibly be interpreted in one of several different ways.

A practice is used in such circumstances because it is an indicator of how the parties have mutually interpreted and applied the ambiguous language. For example, in a dispute concerning the meaning of an LMOU provision, evidence showing how the provision has been applied in the past provides insight into how the parties interpreted the language.

If a clear past practice has developed, it is generally found that the past practice has established the meaning of the disputed provision.

To Implement Separate Conditions of Employment

Past practice can establish a separate enforceable condition of employment concerning issues where the contract is "silent." This is referred to by a variety of terms, but the one most frequently used is the silent contract. For example, past practices of providing the local union with a file cabinet may become a binding past practice, even though there are no contract or LMOU provisions concerning the issue.

Changing Past Practices

The manner by which a past practice can be changed depends on its purpose and how that implement or clarify existing contract language are treated differently than those concerning the "silent contract:"

Changing Past Practices that Implement or Clarify Contract Language

If a binding past practice clarifies or implements a contract provision, it becomes, in effect, an unwritten part of that provision. Generally, it can only be changed by changing the underlying contract language, or through bargaining.

Changing Past Practices that Implement Separate Conditions of Employment

If the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice.

Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit. If the parties are unable to agree, the union may grieve the change.

Management changes in such "silent" contracts are generally not considered violations if 1) the company changes owners or bargaining unit, 2) the nature of the business changes or, 3) the practice is no longer efficient or economical. The first of these has rarely arisen in Postal Service cases involving its numerous bargaining units.

A change in local union leadership or the arrival of a new Postmaster or supervisor is not, in itself, sufficient justification to change or terminate a binding past practice, as noted in the previous paragraph.

PowerPoint slide 19

Article 7 – Employee Classification

Article 7 is the article regarding employee classifications. Each National Agreement contains various types of employee classifications and restrictions on their use. Please consult the applicable National Agreement and interpretive manual.

PowerPoint slides 20-49 APWU Work Hours & Overtime

PowerPoint slides 50-76 NALC Work Hours & Overtime

PowerPoint slides 77-102 NPMHU Work Hours & Overtime

U178

I Have been in the Post office
40 yrs + Military.

FLATS have Always been placed
in Buckets by my Case.
By doing This. It Takes The clerks
& The Carriers Longer.
I Thought The idea was To hit
The street as fast As you can.
You can't it Takes Longer.
My Back Does not Feel
As Good As before.
This is Bass Always.

Anthony Foculor
Belle Meade STA Nashville Tn, 37205

4-4-14

U 179

MY NAME IS STEPHEN SLATER. I HAVE BEEN A LETTER CARRIER FOR 27 YEARS. I HAVE BEEN FORTUNATE IN REGARDS TO WORK RELATED INJURY. I HAVE HAD NONE AND HOPE TO KEEP THAT STREAK GOING. THE STAGING OF FLAT MAIL IN PLASTIC INSERTS HAS BEEN COMMON PRACTICE THROUGHOUT MY CAREER. IT IS VERY HELPFUL IN LIMITING STRESS ON LOWER BACK. HOPE IT CONTINUES

Stephen C Slater

LETTER CARRIER - 37205

9-09-14

I Ted A. Baladad been in the Post office since 1996. Flats and bulk magazines always been placed in a tub inserts. We can sort them by dates if we have to curtail some for the day and also can go through it if we have 2nd class mixed-up so that we can deliver those first before the standard or bulk mail. Putting mail (lose) on the ledge slow down the casing of mail because you can't even case anything on the first row and sometimes on the second row if there's a lot of mail on the ledge.

Ted A Baladad
Letter Carrier
T6

U181

MARY SAUNS

WORKED AT POST OFFICE:
27½ YEARS

MAIL HAS BEEN STAGED AT CASE IN BUCKETS SINCE BEFORE I STARTED WORKING AT POST OFFICE.

Mary Sauns
LETTER CARRIER
9/9/14

U184

9/9/14

TO Whom it may Concern,

My Name is BRAD DEAN
I've been with post office
for twenty years and we've
always staged our Bulk mail
in plastic Buckets

Thanks

I, R.O. McDonald have been delivering mail at Belle Meade Station for 49 years, and have always used flat tubs, for staging bulk mail, so I can prevent back problems.

U188 7-8-14

I, Steven Chessman Have work In the Post Office for 13 years and They have Always staged Bulk Mail at my case In plastic Buckets.

Steven Chessman
City Letter Carrier
Belle Meade Post Office

U189

My name is David Wilkerson. I have been at the post office over 25 yrs and they have always staged bulk mail at my case in plastic buckets

David Wayne Wilkerson
9/9/14

To whom it may Concern: U190

My name is Brian Butler and I have worked for the post office for over 28 years. The entire time I have worked here bulk rate flats and second class magazines have been staged in white buckets at my case.

Brian Butler
Route 5B2
37205

9-9-2014

I, RALPH GARRETT HAVE BEEN A LETTER CARRIER FOR 28 YEARS. WE HAVE ALWAYS HAD FLATS DELIVERED TO OUR CASE IN FLAT TUBS - PARTICULARLY FOR FOR BULK MAIL STAGING

V192

9-9-14

I have worked for the Post office for 27 years hired in 1987, They have always put bulk mail in flat tubs.

Thank You

Scott Tomlinson

Scott Tomlinson

V193

Name
Mike Cochran Rt 029

I have been working at the post office for 25 years 9 months and I have always had my mail staged in buckets at my case! Bulk mail, 2nd Class mail Everything!

Paul M. Cox
9-9-14

9.9 2014

V194

To Whom it may concern:

My name is Steve Weakley, I am a city carrier at Belle Meade Station in Nashville, Tn. I have been a carrier for more than 30 years and in all my time as a carrier the flats were staged at the case inside of plastic flat trays.

Steve Weakley

.1196

U195

I HAVE BEEN A MAIL CARRIER FOR 20 YEARS AND WE HAVE ALWAYS USE FLAT TUBS, FOR STAGING BULK MAIL.

Tim Jordan

U197

MY NAME IS KEITH GRAY BEEN WITH POSTOFFICE
SINCE FEB 1999 AND HAVE ALWAYS HAD
FLAT TUBS AT CASE FOR
STAGING BULK MAIL THANK YOU

U198

John Martin Jr. 1-30-99 start date.

Since ~~start~~ mail has always

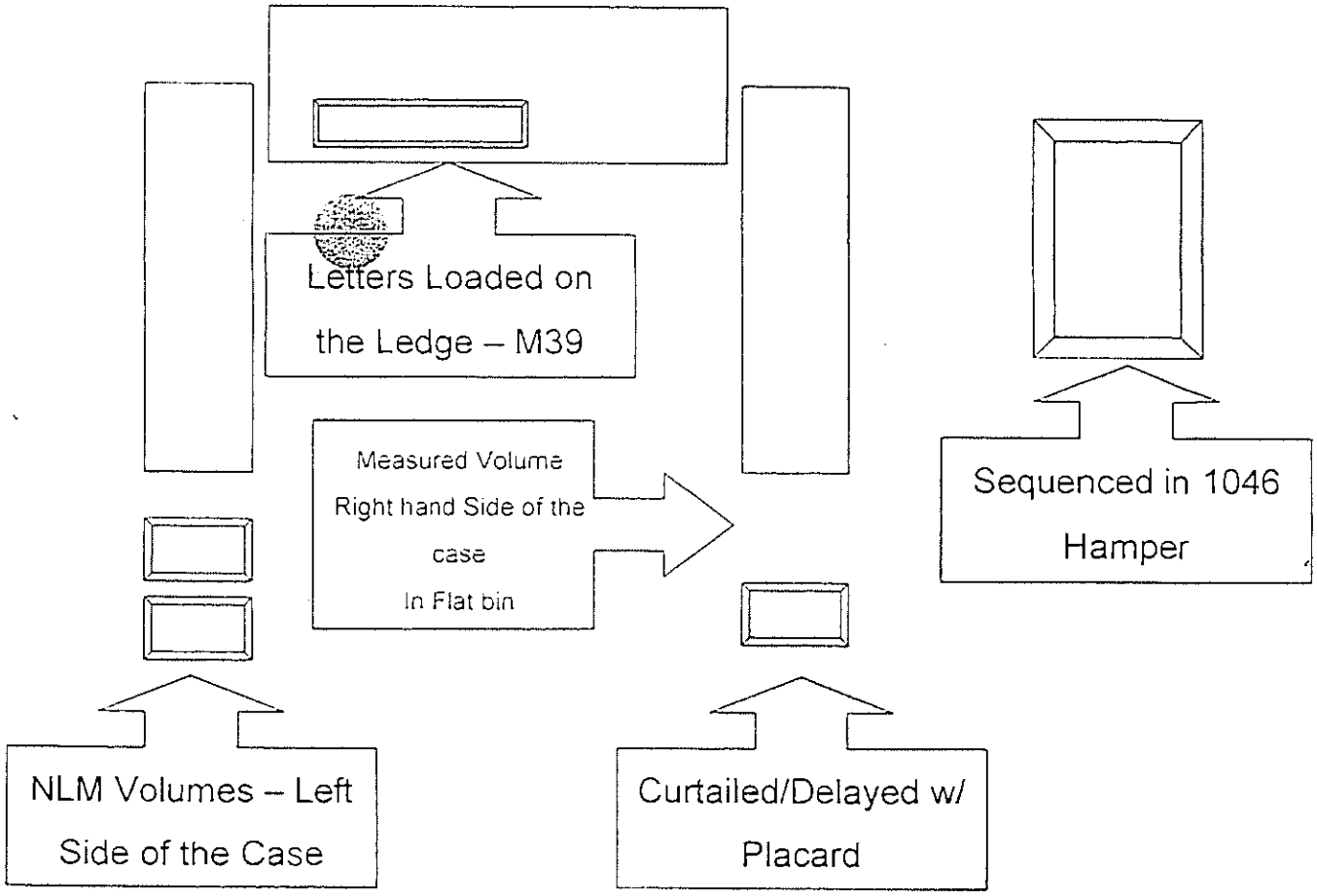
Been

Staged mail at case in flat tubs.

Southeast Area

UNITED STATES POSTAL SERVICE

STAGING MAIL VOLUME

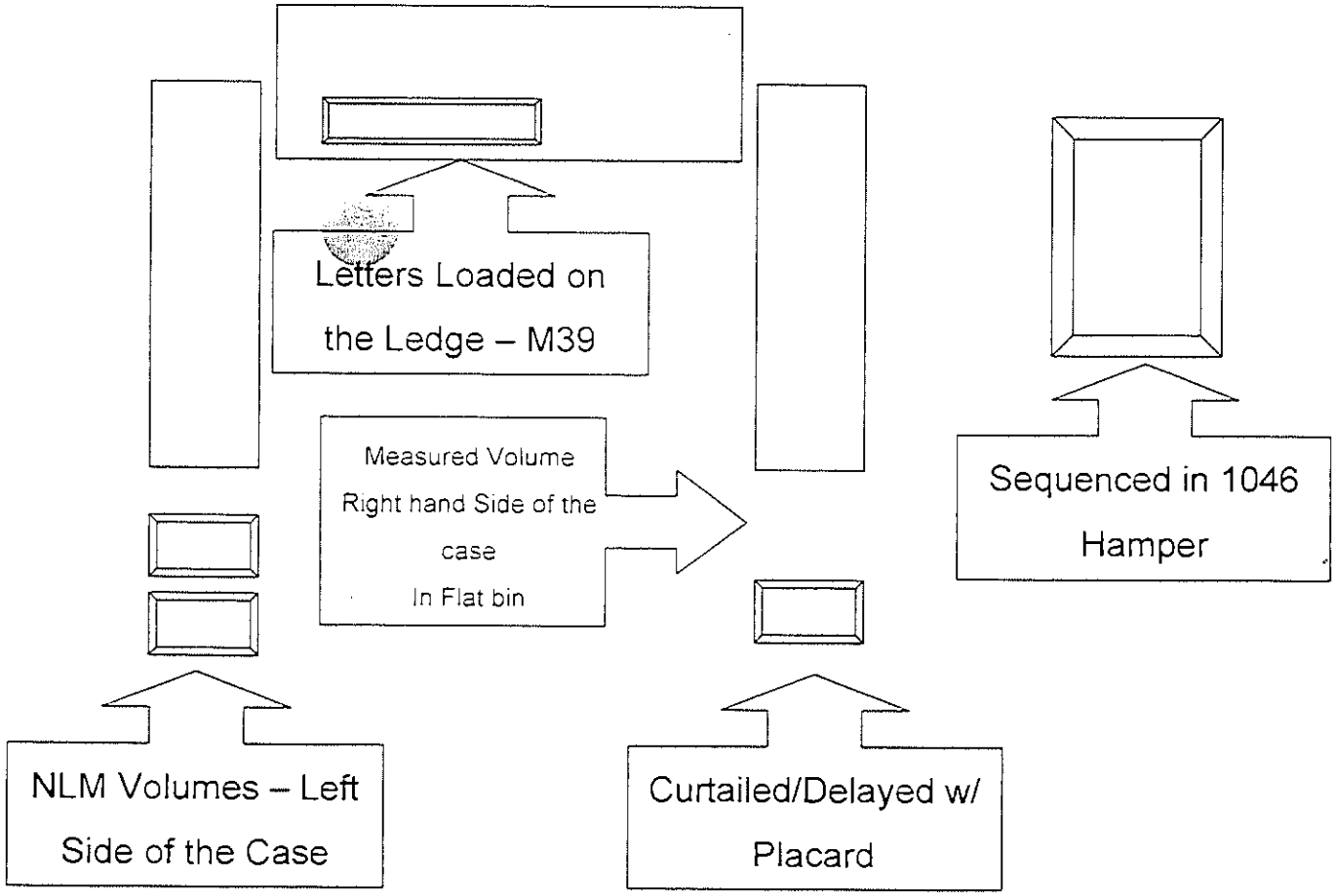


U199

Southeast Area

UNITED STATES POSTAL SERVICE

STAGING MAIL VOLUME



Tennessee District Staff Spot Audit

Unit: Belle Meade Station 37205 **Reviewer:** John D. Crockett

Date: 9/4/14 @ 07:20

Enter X in Applicable Cells Below

Audit % Achieved: 85.71

	QUESTIONS	Full Credit	1/2 Credit	No Credit	N/A	COMMENTS
	AM Observations					
1	Is function 4 staffed to achieve distribution up by 0800?			X		Heavy volume and 4 clerks working. Unit received 4 gaylords, 5 wires, and 1 OTR. Truck was also 30 minutes late.
2	Are clerks working preferential mail first?	X				
3	Are clerks staging the ADVO's in the carrier hampers and not at the cases?				X	
4	Are carriers on high parcel volume routes loading vehicles during vehicle inspection and replacing the hamper for clerks?	X				Several carriers complained of "safety hazard" by being required to load LLV crossing alley. Non-issue.
5	Was mail loaded on ledge prior to carriers reporting time?	X				
6	Are carriers cases clean and clear of empty equipment?	X				At least 2 carriers requested the use of flat tubs at case to prevent bending down unnecessary - that cotton installed with more functioning.
7	Is the Unit following the District SOP on Clean Cases? (Is there debris or papers in empty slots on the cases)	X				
8	Was there any mail that was delayed or curtailed?	X				Route C022 carrier Buttrey could achieve improved office time with less time spent visiting/distracting/talking with other carriers
9	Was all mail properly sorted to bed?	X				
10	What time did the unit complete the Distribution Up Time scan?			X		8:41 a.m. (see item 1)
11	Was an all clear announced to the carriers when the mail was cleared?	X				
12	What time did the first and last carrier leave for the street? Enter in Comments Section					First carrier C019 departed to route at 8:59 a.m.
13	Are all vacant routes cased first and were all pivots available prior to the first carrier leaving?	X				4 routes were pivoted. 1 CCA to report for C011, cased by carrier leaving early.
14	Were the vacant routes for CCA's cased and pulled down by the time the CCA clocked in?	X				
15	Is the opening supervisor reviewing all MSP discrepancies with the carriers daily?	X				
16	Did you look at the MSP Variance log and is it up to date and utilized every day?	X				
17	Is the distribution area reset to work drop shipment parcels in the afternoon?				X	
	PM Observations					**Notes:**
18	Did any carriers bring back unidentified preferential mail? (check hampers for non delivered items. If there is a scan, check it thru track and confirm)				X	
19	Were collection separations being conducted properly?				X	
20	Is all readable mail dispatched on every trip?				X	

Upon completion of this audit, post master to include the following: Please fax distribution sheet and Mail Sort Area daily tracking report. Any observations you have please write down and send this form and cost center up to Manager of Operations and Manager of Delivery Programs. Thank you

U202

September 17, 2014

Corey Walton,

Per your request for information extension, I am requesting the interview questions that you will be asking the author of the Eastern Area delivery foundation.

Thanks,

Eric Baxter

As per my conversation with Sandy Quick, I need the memo as stated on the 1767's. The "Eastern Area Delivery Foundation." I will base my questions off of this memo. I will not be furnishing any questions to anyone in advance.

Thank you
Corey L Walton

Tennessee District NALC Task Force Meeting **September 30, 2014**

Members present: Jessica Pinager-Management Co-Chair, Charisse Gamble-Mgr., Human Resources, Charissa Dotson-City Carrier, Memphis, Joe Santagado-PM, Morristown, Genie Kinsey-City Carrier, Nashville, Kim Alley-Mgr., Safety, Larry Jones, Manager, Post Office Operations (A), Brian Scott, Supervisor Customer Services, Camden, , Mike Fry-Postmaster, Cedar Grove, TN, Corey Walton-City Carrier, Robert Sneed-City Carrier

Main Points of Meeting:

- Jessica Pinager, OIC of Hendersonville, Tennessee was introduced as the new Management co-chair of the Task Force. Randy Bryant is currently on a detail to the Eastern Area.
- Jessica went over the most recent NALC OSHA II and MVA data for the Tennessee District.
- The group discussed field visits and some groups have been focusing more on street activities. Everyone agreed that teams would begin focusing on office activities on field visits making sure to give safety talks when in the field.
- Mike Fry went over recent observations that were done in Southwest Tennessee.
- The question of whether carriers are allowed to make right turns at intersections with the door open came up. Clyde Winters Jr., Driver Instructor, joined the group and explained that anytime that a carrier is entering or crossing an intersecting roadway, the door must be closed. Clyde explained that people run stop signs and sometimes hit our carriers. Making these turns with the door open puts our employee's safety in jeopardy in the case of such an accident.
- Corey Walton asked all team members to give talks regarding this regulation when making field visits.
- The group agreed that post offices need to take safety talks more seriously. Kim Alley, Safety Manager, stated that she would drive this point home often when sending out safety talks and messaging.
- The group talked about bringing Safety Captains back in post offices.
- Corey talked about ergonomics and offices not using flat tubs to stage mail at the cases. Corey stated that now the mail is being staged directly on the floor and this takes away from ergonomics. Charisse talked about flat coffins being used at high volume offices. Corey stated that in his office, Belle Meade, they sometimes still have 10-11 feet of flats that will not fit into the flat coffins.
- The group talked about the most recent runaway vehicle accident that occurred within the district. The group discussed the importance of carriers curbing their wheels and how this can prevent rollaway/runaway vehicles. Kim stated that the largest number of infractions on 4584s is employee's not curbing their wheels properly.
- Jessica and Genie are scheduled for field visits on October 3, 2014

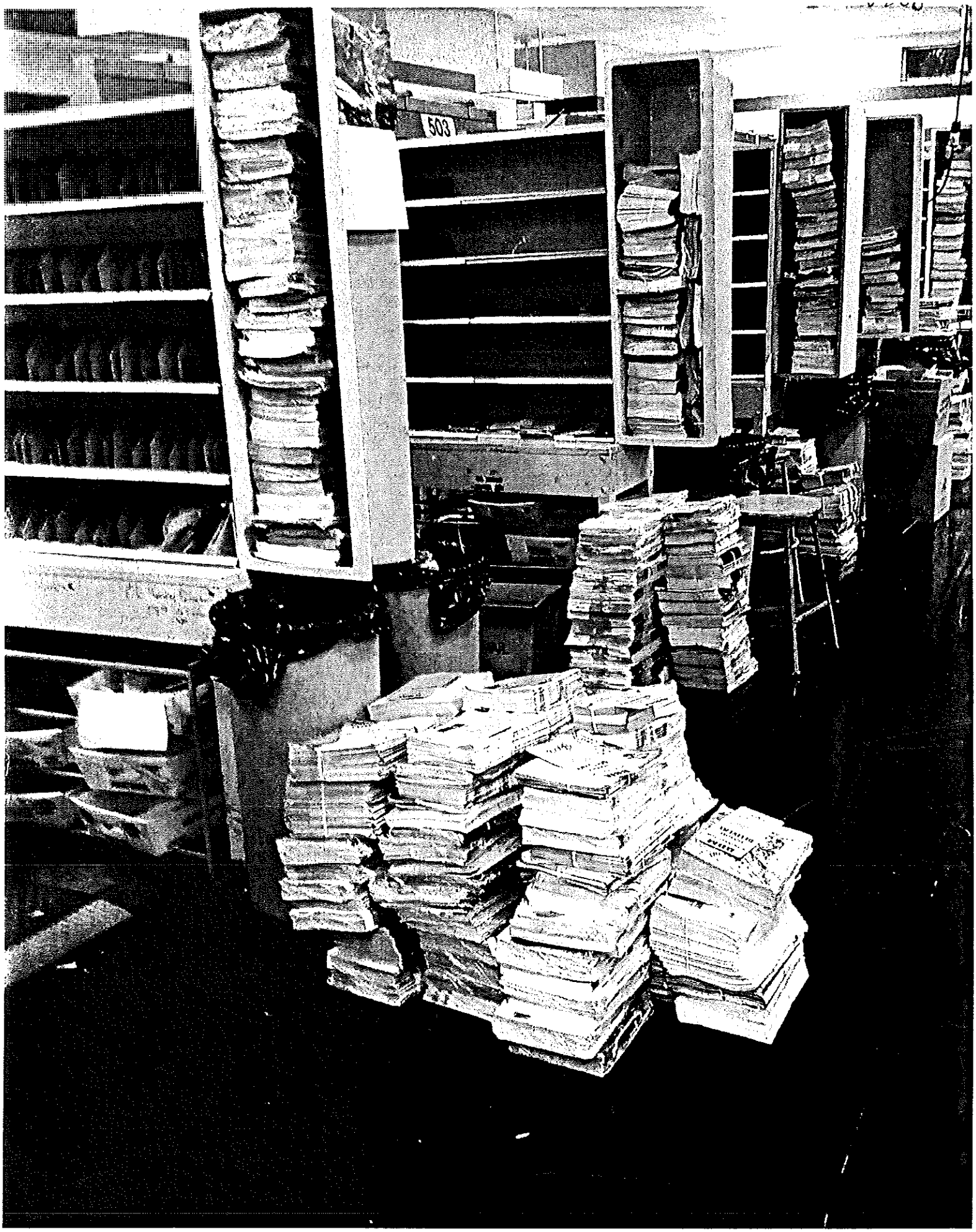
Tennessee District NALC Task Force Meeting **July 31, 2014**

Members present: Randy Bryant-NALC Co-Chair, Bruce Goetz-Manager Safety, Eastern Area, Dave Clark-NALC, Jessica Pinager-PM, Gallatin, Charisse Gamble-Mgr., Human Resources, Charissa Dotson-City Carrier, Memphis, Joe Santagado-PM, Morristown, Genie Connerly-City Carrier, Nashville, Kim Alley-Mgr., Safety, Jack Branch-City Carrier, Mike Fry-Postmaster, Cedar Grove, TN, Corey Walton-City Carrier, Robert Sneed-City Carrier, Neal Dekich-Postmaster, Trion, GA

Main Points of Meeting:

- Randy Bryant started the meeting by asking the team to contribute by sharing what has been found on recent observations.
- Kim Alley went over the NALC MVA and OSHA II data for June.
- Bruce Goetz asked the team to look at the spikes in August and September of last year to determine who was having the accidents and what types of accidents were being recorded.
- Charisse added that there has been an increase in the number of accidents involving CCAs.
- Randy Bryant went through specific observation data. Recent observations were done in Chattanooga, Clarksville, and Dalton.
- Joe Santagado and Jack Branch are scheduled to conduct observations the first week of August. Randy explained to them that they should plan on taking a full day and securing a staff car.
- It was discussed that the Dalton GA post office employees were not as receptive to the team's feedback. The team did street observations and visited the office as well.
- The carriers in Chattanooga were more responsive than the carriers in Dalton. The team stated that the carriers in Dalton seemed more interested in making good time on the route rather than being safe.
- The teams reported that many carriers are telling them that they are not receiving weekly safety talks. Bruce added that safety talks do not change behavior, observations do. Driving has changed with more drivers being distracted with things such as texting and talking on cell phones.
- Corey told everyone that no one should ever accept the explanation that "management is pushing me". He said that safety trumps everything and that management cannot make a carrier be unsafe.
- Dave Clark added that seasoned employees know that safety comes first. Newer employees such as CCAs worry more about getting back to the office by 1700. He stated that maybe we need to focus more on CCAs.
- The proper procedure was discussed as to how a team should handle a situation of finding a carrier out of the vehicle with the vehicle running. Bruce explained that all NALC Business Agents in the Eastern Area have agreed that in this situation, the NALC representative will walk away and the Management team member will handle.

- Heat safety was brought up. Robert Sneed asked why can't carriers with pivots carry the walking part first to avoid the heat of the day.
- Charissa Dotson and Mike Fry stated that when they were conducting their observations, they observed numerous carriers driving with their door open when it should have been closed. They have also observed several carriers not wearing their seatbelt. Charissa stated that carriers sometimes get upset with her when she discusses safety with them
- Dave Clark asked about flat tubs in the offices. Charisse explained that flat tubs will not be used to stage bulk mail in the stations and associate offices. Bundles of bulk mail will be staged directly on the floor at the carrier's case.
- Bruce told the team to keep pushing. He said that if we can save one life or injury, it's all worth it.
- Kim asked the team to come up with a day each month they would like to meet so that we could have a recurring scheduled meeting that would work for everyone. Everyone should make their recommendations to Randy Bryant or Corey Walton.
- Charisse thanked the team for their efforts.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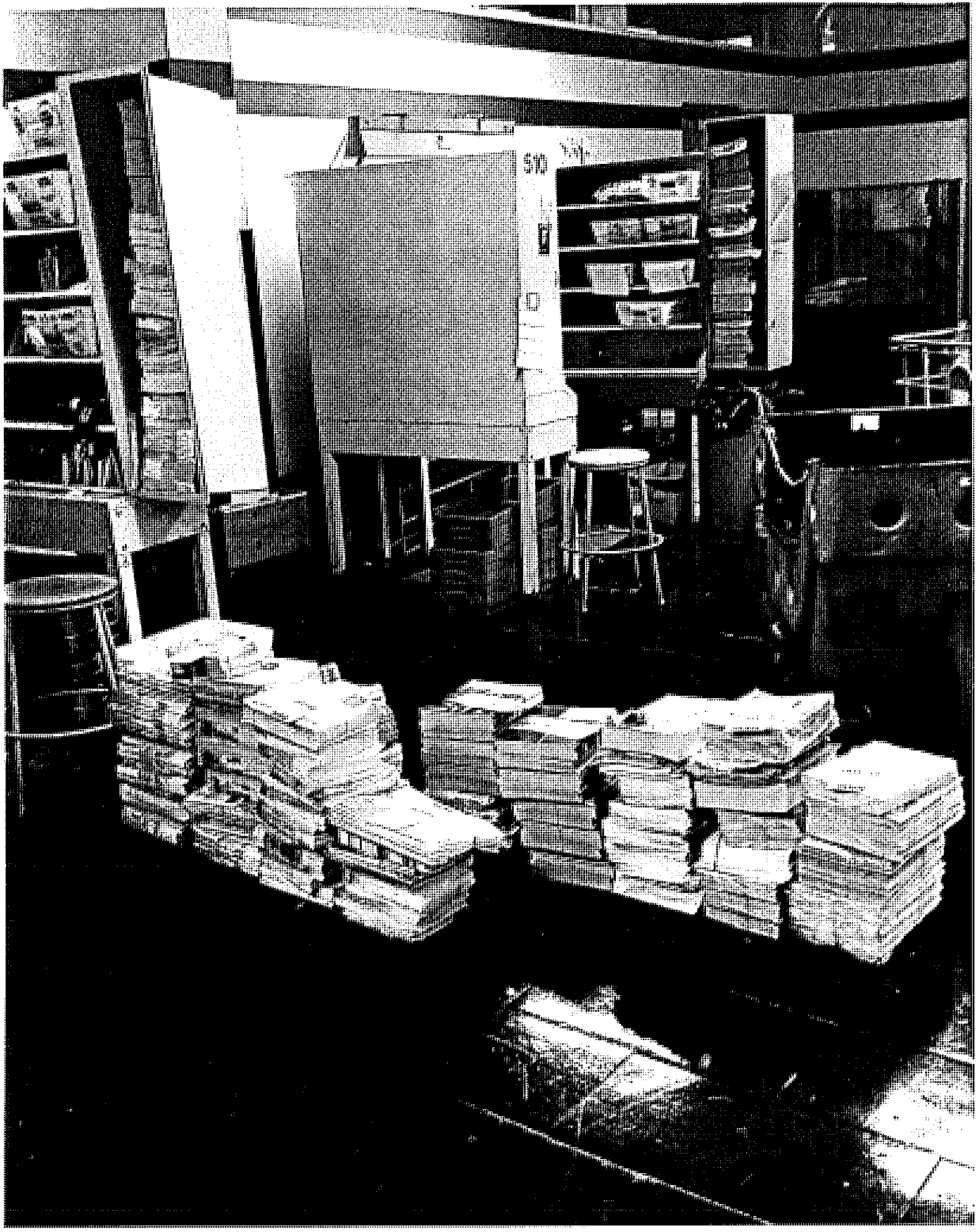

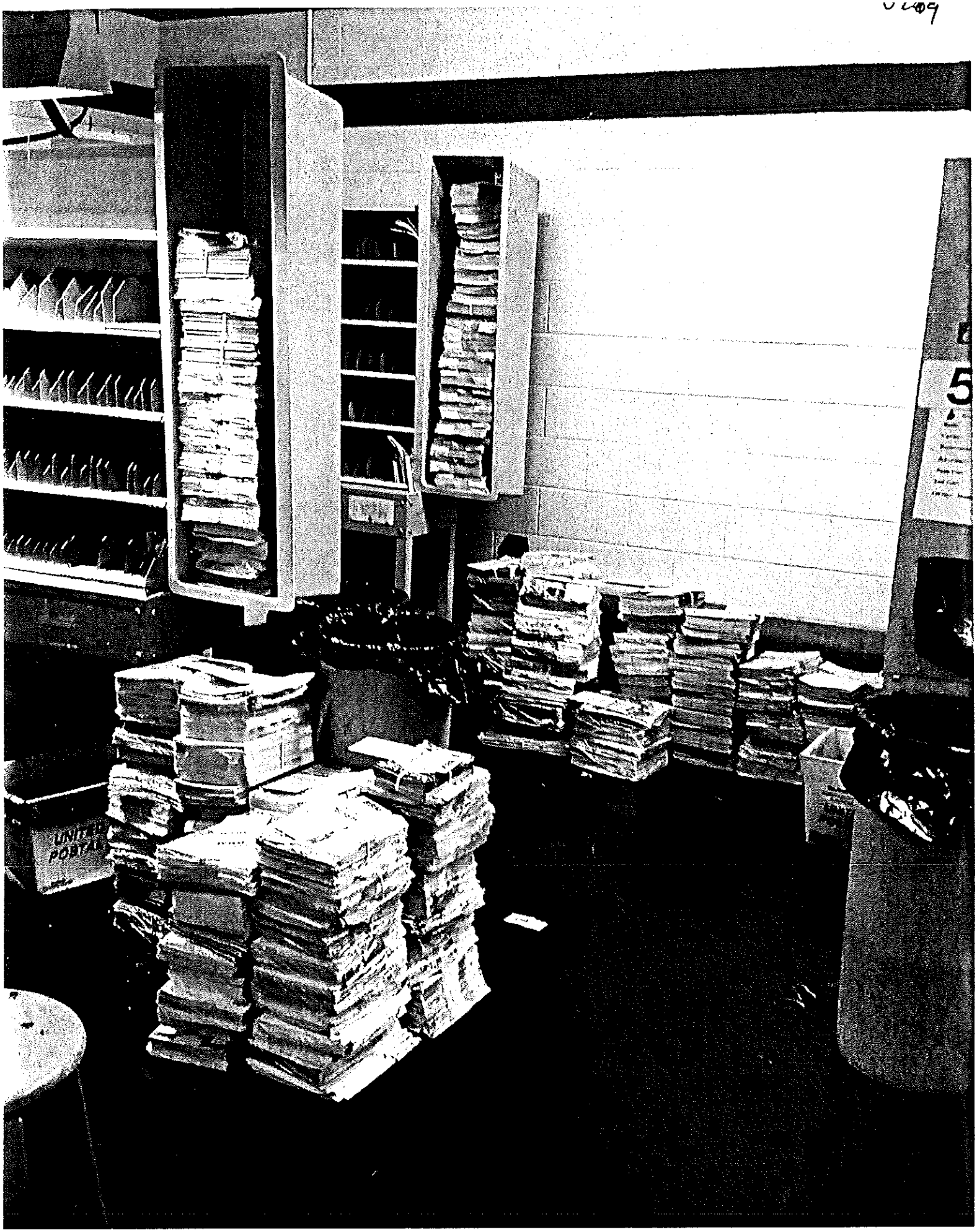
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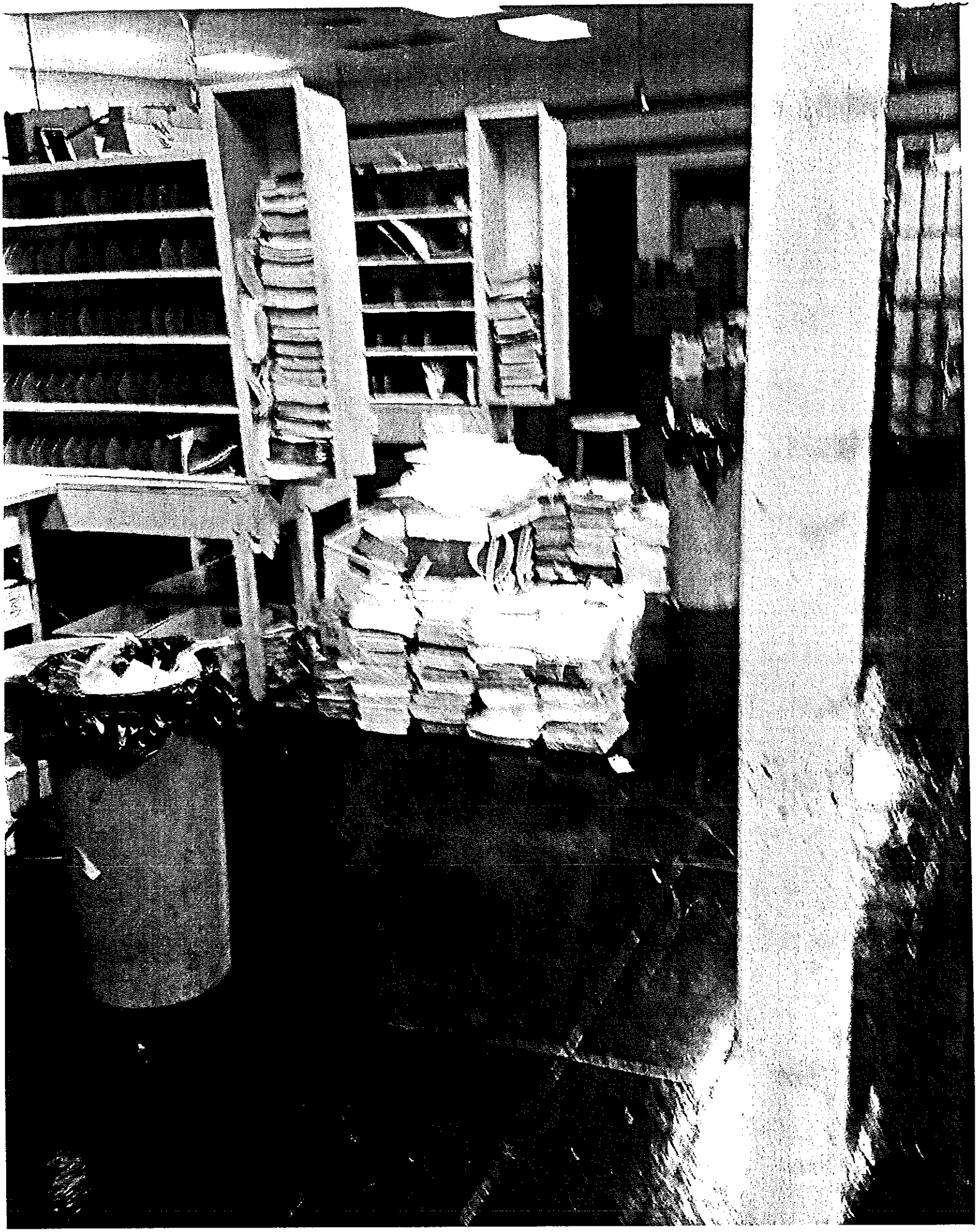

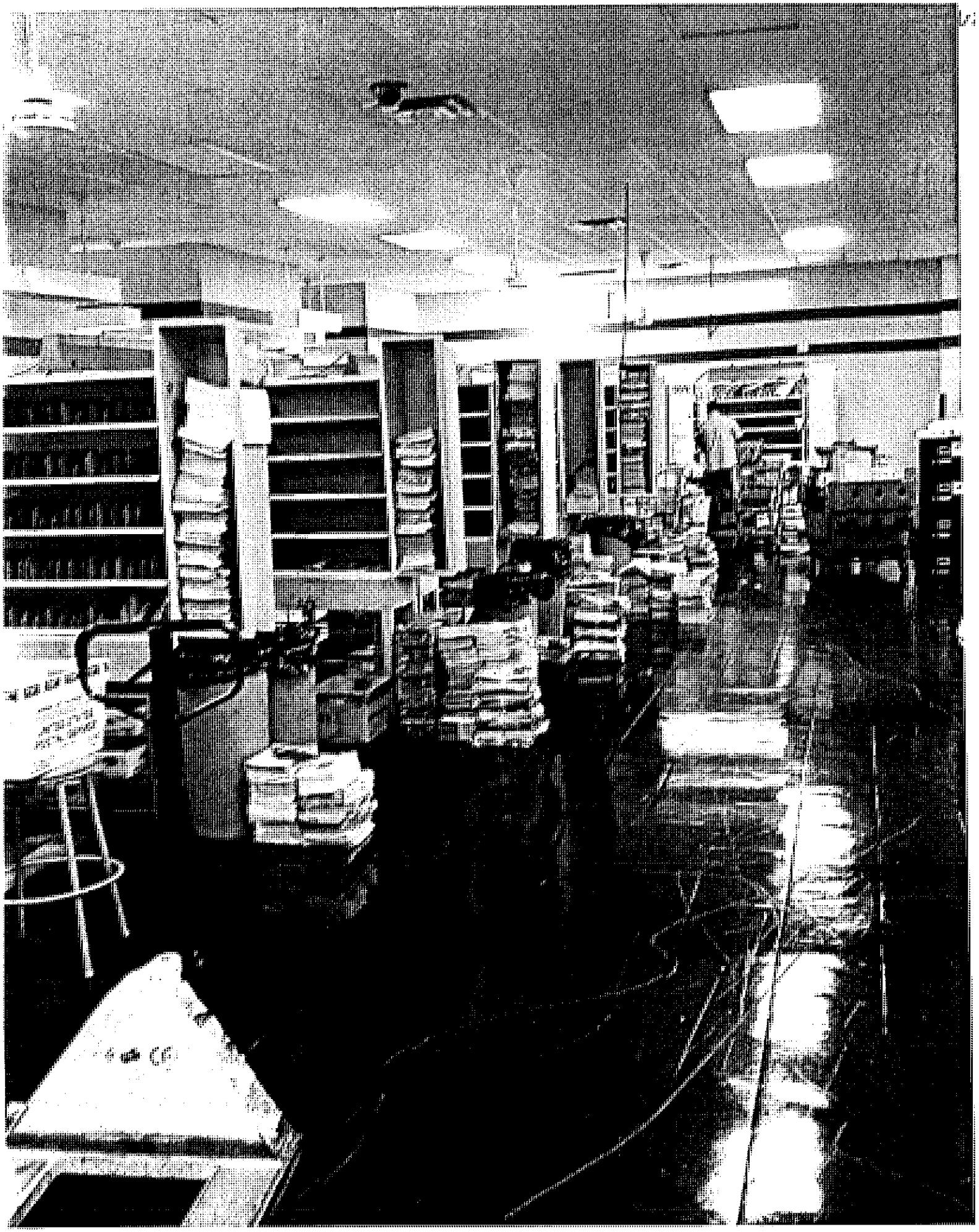

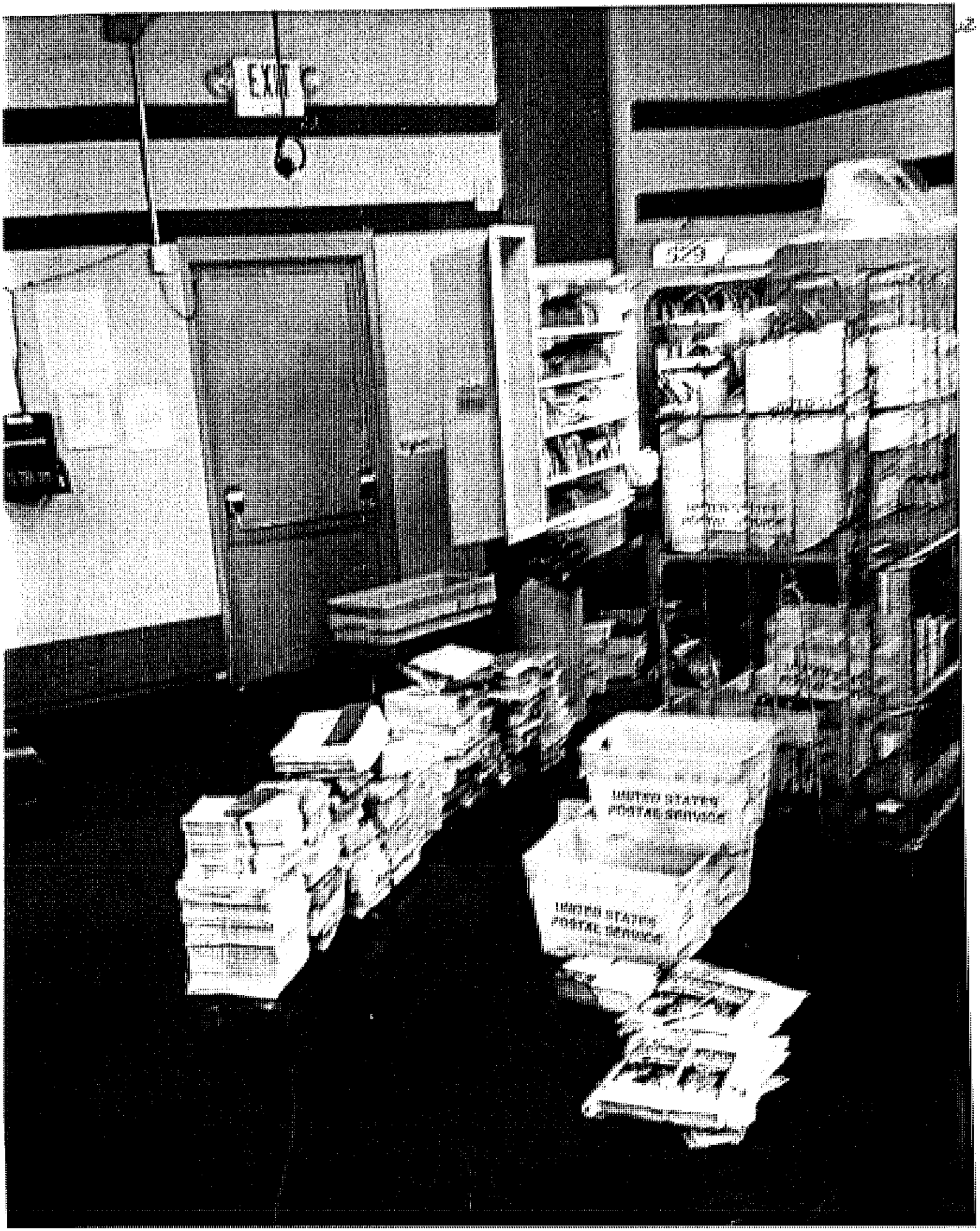
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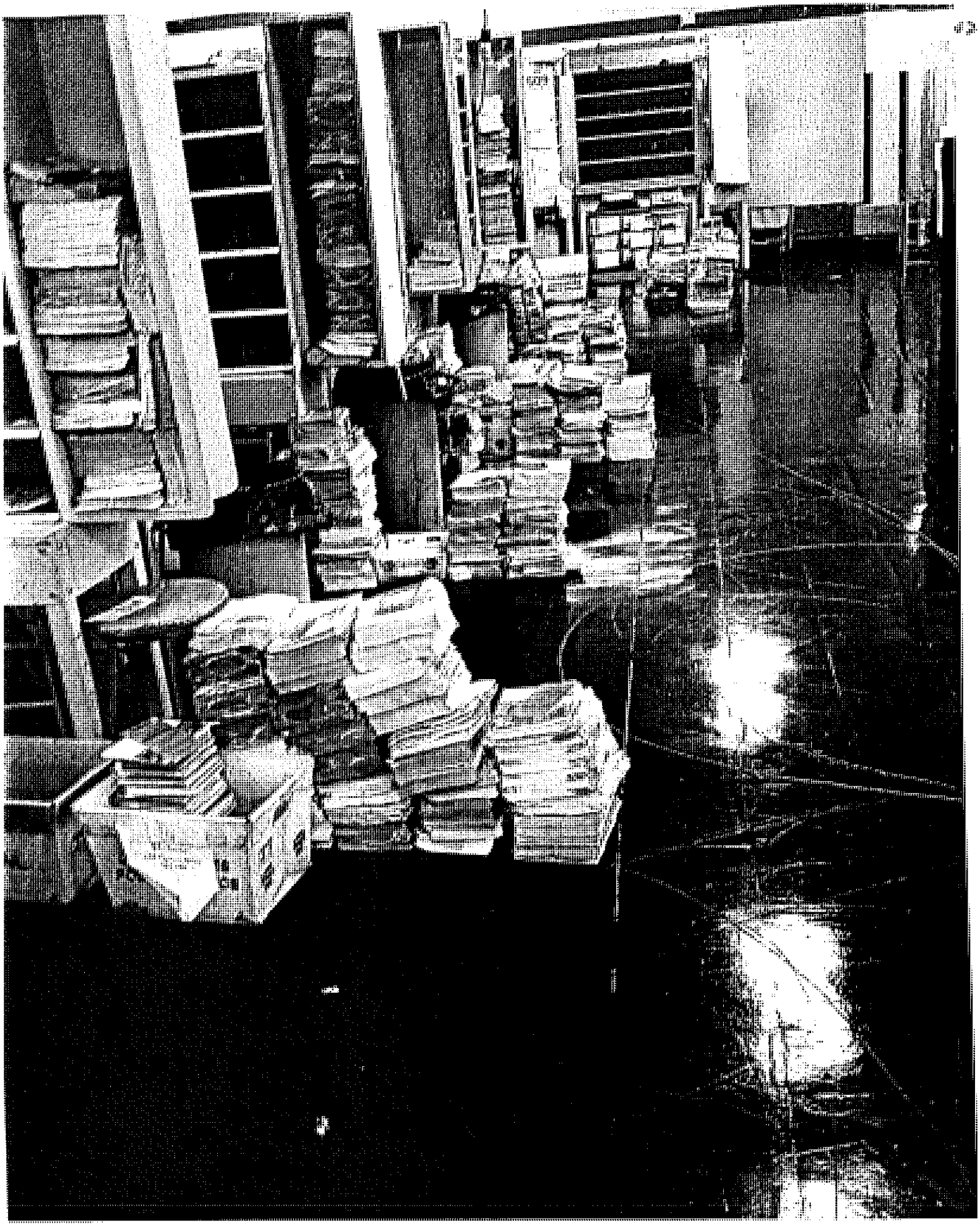

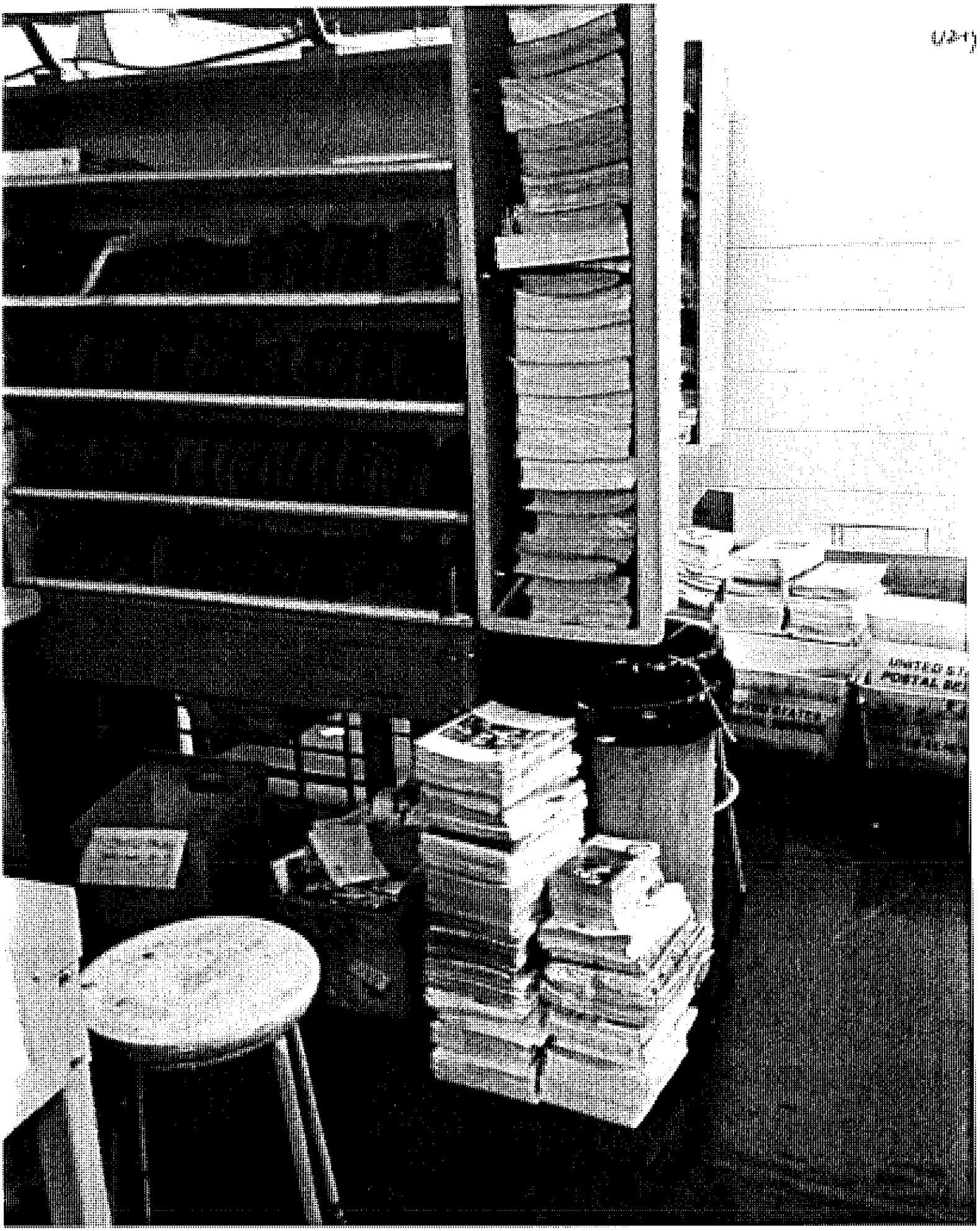

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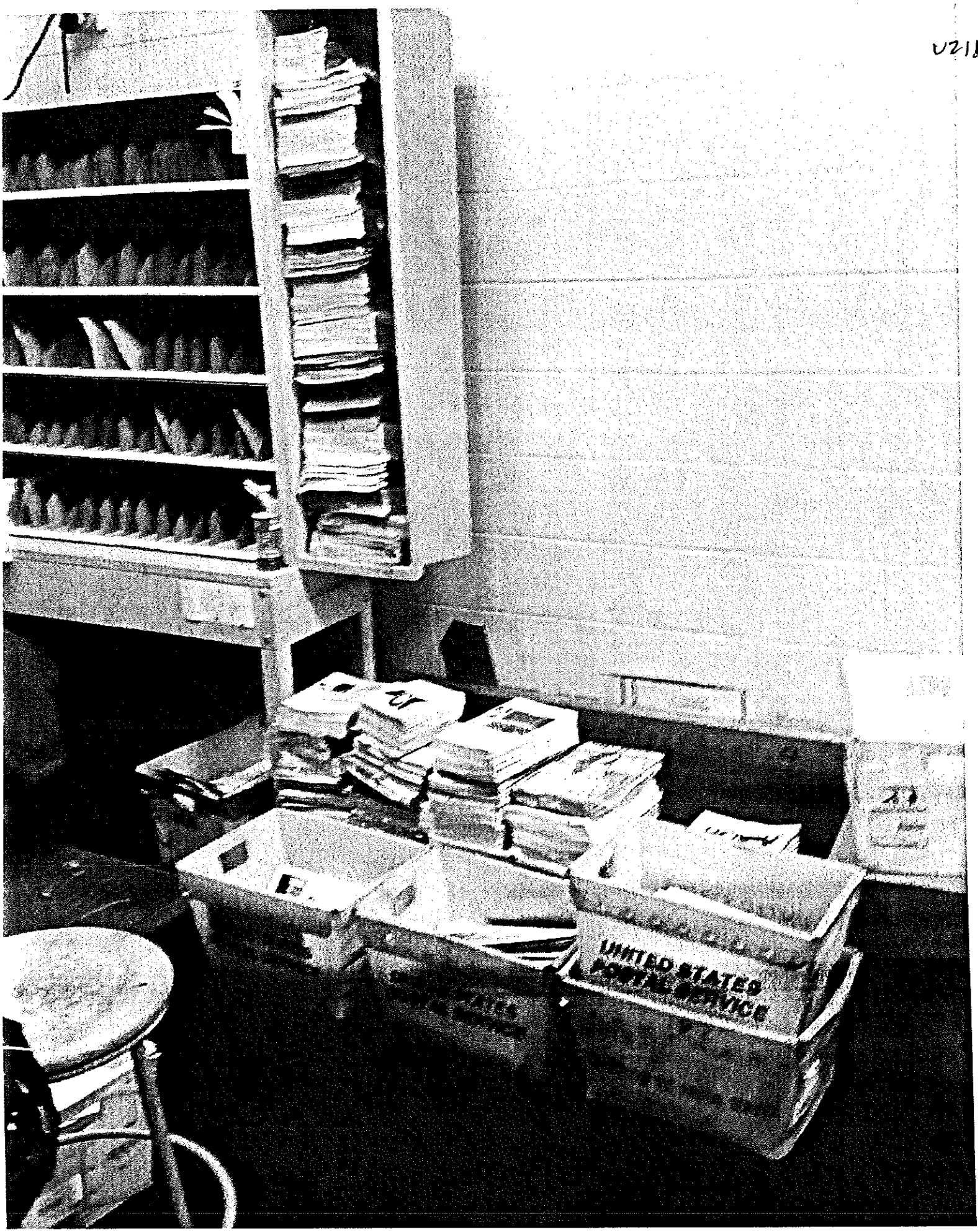

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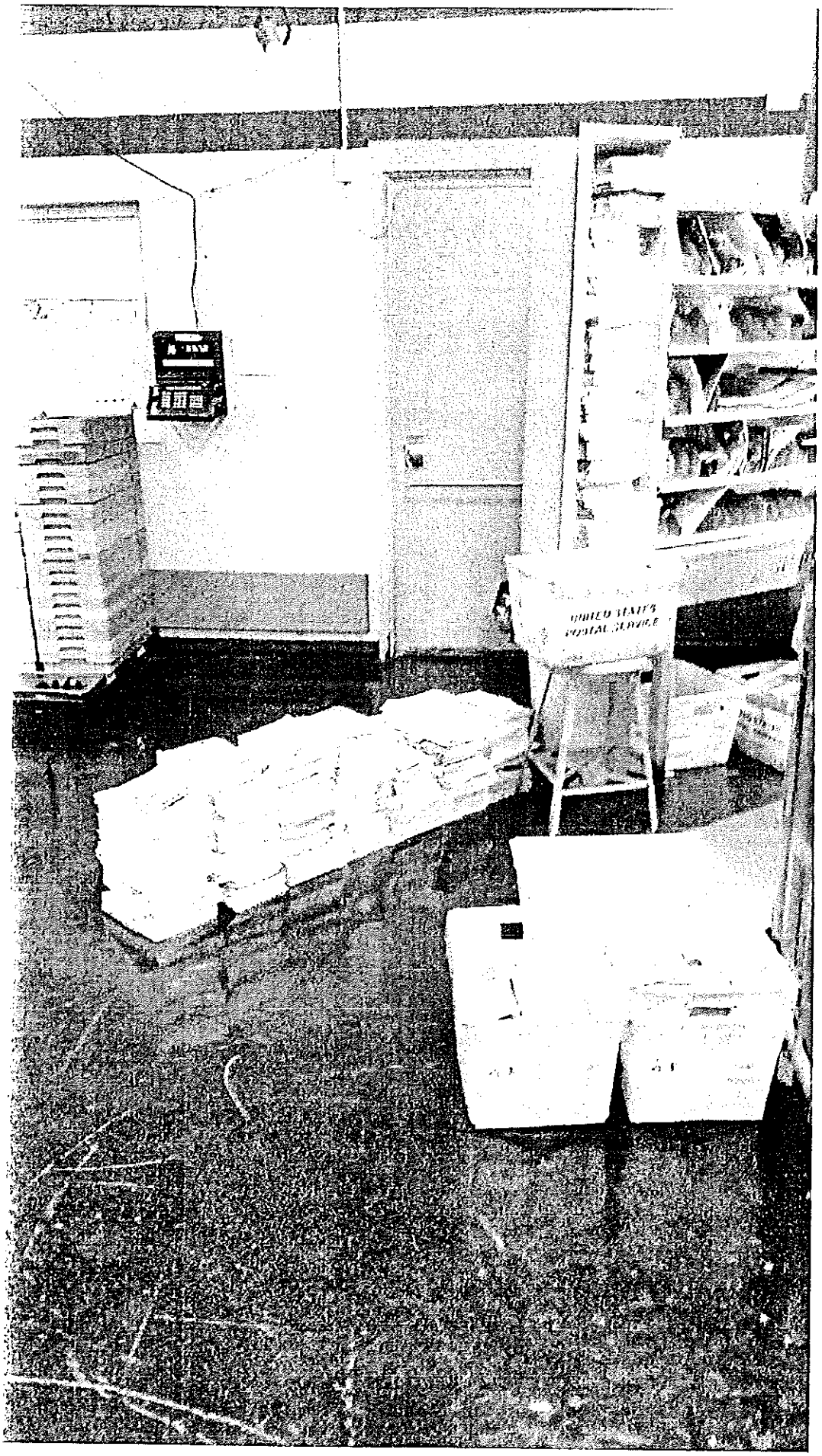
U219



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U 220

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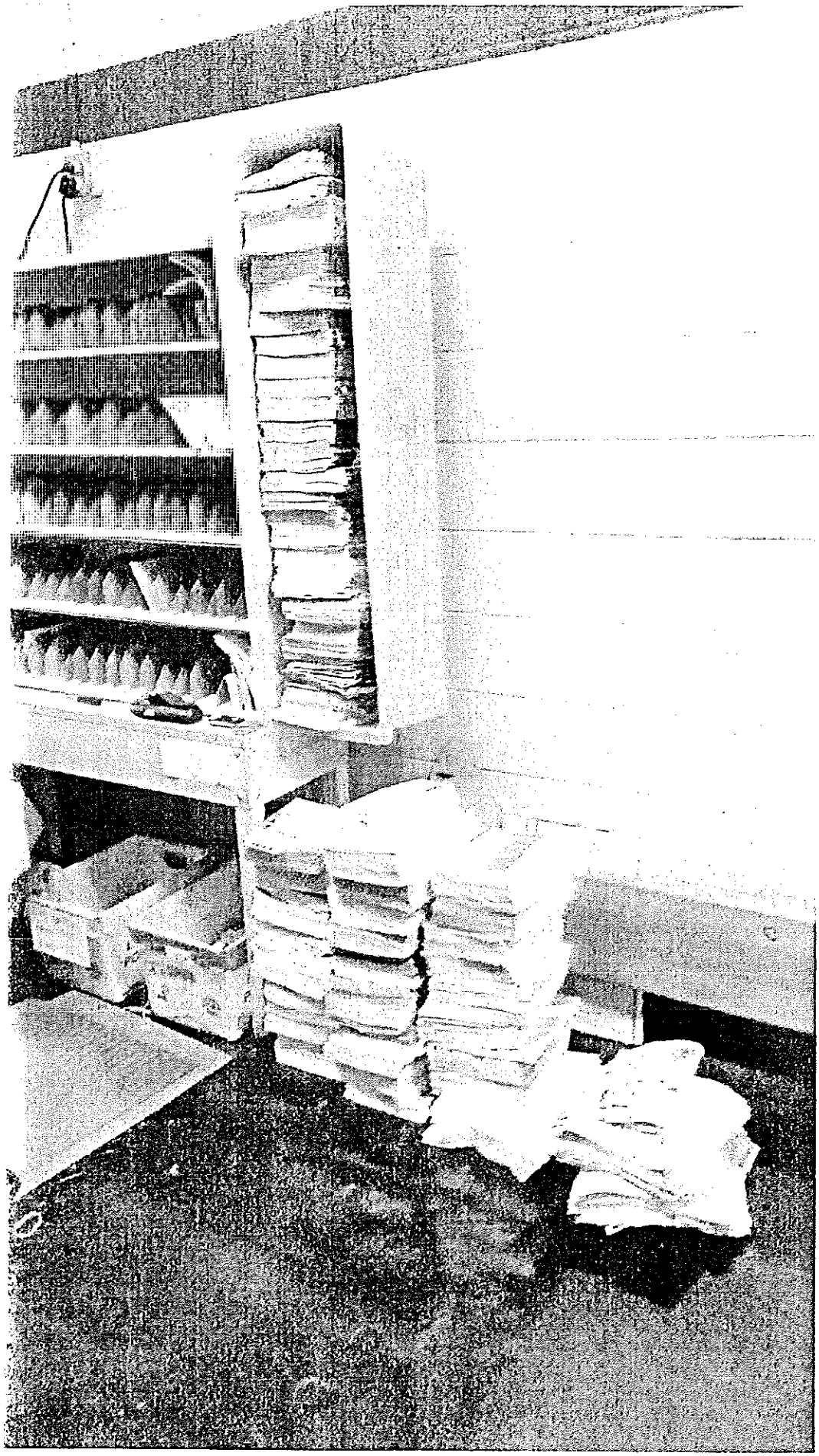

U223

U224

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number *(Assigned by Safety Office)*

I. Employee's Action

Area *(Specify Work Location)*

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.

Employee	Signature	Date and Tour
		3-26-2017

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

Supervisor	Signature	Date

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement):*
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
✓	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number *(Assigned by Safety Office)* ___ ___ ___ ___ ___

I. Employee's Action

Area *(Specify Work Location)* [illegible]

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

[illegible] REMOVAL OF EXPOSED - INSERT MAIL FORCED UNNECESSARY [illegible] ON WORK AREA AND FACES. REPETITIVE MOTION AND STRESS ISSUE.

REQUIRE NEW RULE BANNING USE OF INSERTS FOR FLAT MAIL

Employee	Signature	Date and Tour
	[illegible]	8/26/94

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

The process of stacking loaded flats already on the floor @ the commercial [illegible] is not [illegible] from [illegible] the [illegible] will be [illegible] to 11 [illegible] [illegible] stacks of flats [illegible] in excess of [illegible] will be [illegible] [illegible] or 11 [illegible] beside the [illegible] [illegible] more than 20" high. [illegible] [illegible] will not [illegible] [illegible] [illegible]

U226

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number *(Assigned by Safety Office)* ___ ___ ___ ___ ___

I. Employee's Action

Area *(Specify Work Location)*

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.

[illegible]

Employee	Signature [illegible]	Date and Tour [illegible]

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

[illegible]

Supervisor	Signature [illegible]	Date [illegible]

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement)*:
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
✓	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

[illegible]

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number *(Assigned by Safety Office)*

I. Employee's Action

Area *(Specify Work Location)*

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

Employee	Signature	Date and Tour
		3-26-94

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

Supervisor	Signature	Date

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement)*:
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U228

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number *(Assigned by Safety Office)*

I. Employee's Action

Area *(Specify Work Location)*

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.

Employee	Signature	Date and Tour

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

Supervisor	Signature	Date

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement):*
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U229

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number
(Assigned by Safety Office)

I. Employee's Action

Area *(Specify Work Location)*

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

Employee	Signature	Date and Tour
	[illegible]	8-26-14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. *(If Corrective Action Has Been Taken, Indicate the Date of Abatement.)*

Supervisor	Signature	Date
	[illegible]	9/2/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice *(Indicate Date of Abatement)*:
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action *(Complete If Necessary)*

Maintenance Supervisor	Signature	Date	Date Hazard Abated

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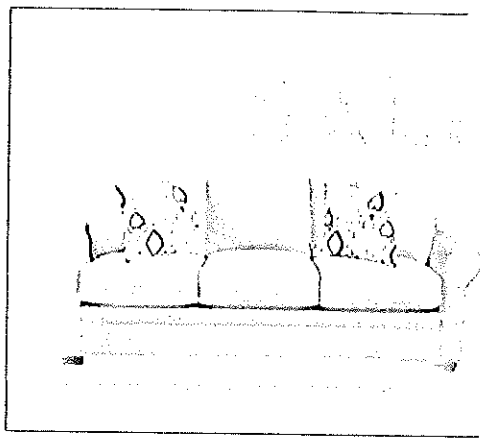

Letter carriers and other postal employees have been saying for several years that changes at the Postal Service would lead to more job-related industries. A new report suggests they may be right.

Figure 1: Comparison of Number of Employees to Workers' Compensation Costs

"Despite the Postal Service's efforts to decrease the number of employees [by 19% since 2008], its workers' compensation costs have increased 35 percent," the U.S. Postal Service Office of Inspector General noted in a last week.

The OIG pointed out that USPS's workers compensation costs per work hour are now 59% higher than those of comparable private-industry workforces. But it offered no data that would help explain the dramatic increases, which led to $1.3 billion in workers compensation claims from July 2012 to June 2013.

The report speculated as to the causes, but most of its guesses seem off the mark: Older workforce? (Nope, it's not much older on average than it was in 2008.) Cost-of-living adjustments? (Average hourly pay at the Postal Service is up only 7% since 2008.) Workers compensation fraud? (You

mean that didn't exist in 2008?)

The OIG put forth one plausible explanation – "the reduced number of light/limited duty positions available because of automation and lower mail volume." But it didn't consider several other possibilities, most of which have been put forward by front-line employees:

- **Increased street time**: Delivery-point sequencing of letters – and, for some areas, flat mail – have meant carriers spend less time in the office sorting mail and more time delivering. That's likely to lead to repetitive-strain injuries, especially on walking routes, for carriers who are delivering to more addresses than ever.
- **Longer hours**: The proportion of overtime hours is up 80% for mailhandlers and 30% for letter carriers so far this fiscal year versus the same period in FY2008. That may also lead to more repetitive-strain injuries.
- **Night-time deliveries**: Reports of carriers working their routes after dark, especially during the winter in northern parts of the country, have grown dramatically in the past couple of years. That seems to be a combination of longer routes and of mail arriving at the delivery units later than in the past. In any case, having carriers negotiating icy sidewalks at night is a prescription for more slips, falls, and fractures.
- **More uninsured employees**: USPS has reduced its costs the past few years partly by replacing retirees with lower-paid, often younger non-career employees. Such employees are more likely to report a pinched nerve or sore knee as a work-related injury, since many have little or no health insurance.
- **More parcels**: Letter volume is declining, but postal employees are handling and delivering more packages than ever -- often using delivery vehicles not suited to the purpose. The higher proportion of heavy and oversized mail pieces may be causing more injuries.

The Postal Service can't address the troubling workers compensation trend without understanding the causes. And the way to get at the causes is not with speculation but with actual data – for example, trends in injuries by occupation, age, and type.

To be fair, the OIG report does offer viable ways for USPS to manage its workers compensation costs better and for overhauling the relevant laws. It notes that the agency is paying workers compensation to two "active" employees who are more than 100 years old – certainly a sign that something is amiss.

Related articles:

Email address

30,156

Thanks for representing the District. Glad that I could be of assistance. I'll check with Mrs. Gamble about funding available to us. She is currently out of the office and will not be back until late this afternoon.

Pat

From: Walton, Corey L - Nashville, TN
Sent: Friday, October 18, 2013 10:14 AM
To: King, Patricia - Sonora, KY; Bryant, Randall G - Chattanooga, TN
Subject: Few things

Good morning,

I just got back fro Washington and I have a lot of stuff to share. We covered a lot of things and some directly influence us. I shared our dog bite prevention for the district and I believe they are going to adopt it as National policy. Thank you Pat for that. They were extremely impressed with what you gave in that regard. Concerning the Ergo topics; I brought up a concern to them in our telecom about tubs being removed from carriers in Antioch. At the face to face the head of ergonomics was there as well as the head of OSHA compliance. They were not happy with that decision and said they would be more than happy to look into that if we couldn't get a favorable outcome to that. I think that the tubs should be provided the carriers asap and the mail be placed in those instead of on the floor.

The head of osha stated that the district has $10,000.00 to use for safety and ergonomics. We should pick some pilot stations and implement some of the ergo ideas that they furnished. I hope we can do that immediately. Whether it is a site in each city or however you want to do it. I do want Antioch to be one for the milk crates that are on the floor, which elevates the mail. They want the mail to be at least knee high and at the moment their mail is sitting on the ground. I don't know who needs to be called or what needs to be done to get them tubs by tomorrow and get that mail off the floor until we can get these crates but I have numbers of people at National if we get no response here. There is a lot more I will share at our next telecom. The Director of Safety and Health Linda DeCarlo, Christina Johnson the occupational Safety and Health Specialist were part of the committee and were impressed with our district. I did a lot of horn blowing for us.

If you have any questions please call me or email me. C# 218-6171

Have a great day,
Corey

Baxter, Eric L - Nashville, TN

From: Walton, Corey L - Nashville, TN
Sent: Wednesday, August 27, 2014 10:27 AM
To: Baxter, Eric L - Nashville, TN
Subject: FW: Few things

From: King, Patricia - Sonora, KY
Sent: Friday, October 18, 2013 12:03 PM
To: Walton, Corey L - Nashville, TN; Bryant, Randall G - Chattanooga, TN
Subject: RE: Few things

Ok...I had called him about Antioch, but he was on Telecom....thanks

---

From: Walton, Corey L - Nashville, TN
Sent: Friday, October 18, 2013 11:54 AM
To: King, Patricia - Sonora, KY; Bryant, Randall G - Chattanooga, TN
Subject: RE: Few things

Antioch is taken care of. Mike Vaughn the MPOO assured me that will be handled.

From: King, Patricia - Sonora, KY
Sent: Friday, October 18, 2013 11:37 AM
To: Walton, Corey L - Nashville, TN
Subject: RE: Few things

OK...THANKS

From: Walton, Corey L - Nashville, TN
Sent: Friday, October 18, 2013 11:12 AM
To: King, Patricia - Sonora, KY
Subject: RE: Few things

There should be the 10,000 that osha said and also the head of ergonomics said they could lend some financial assistance as well. We can discuss that at the next telecom. See what you can find out about Antioch. I have the poom looking into it. I feel the supervisor is not being honest. Regardless mails should never at no time ever be sitting on the floor. At any point for any length of time.

From: King, Patricia - Sonora, KY
Sent: Friday, October 18, 2013 10:51 AM
To: Walton, Corey L - Nashville, TN
Cc: Bryant, Randall G - Chattanooga, TN
Subject: RE: Few things

Corey,

Baxter, Eric L - Nashville, TN

From: Walton, Corey L - Nashville, TN
Sent: Wednesday, August 27, 2014 10:25 AM
To: Baxter, Eric L - Nashville, TN
Subject: FW: Crates

From: King, Patricia - Sonora, KY
Sent: Tuesday, October 22, 2013 9:33 AM
To: Walton, Corey L - Nashville, TN
Subject: RE: Crates

Ok thanks

From: Walton, Corey L - Nashville, TN
Sent: Tuesday, October 22, 2013 9:00 AM
To: King, Patricia - Sonora, KY
Subject: RE: Crates

Ergonomics is trying to push certain items. The crates elevate the mail off of the floor. They want mail to be above the knees. The crates are something that is being tried at different stations. If there is a push for something I would like for the TN district to be ahead of the curve and recognized as being ahead of the pack. I will find the pics for you

Thank you
Corey

From: King, Patricia - Sonora, KY
Sent: Monday, October 21, 2013 4:54 PM
To: Walton, Corey L - Nashville, TN; Bryant, Randall G - Chattanooga, TN
Subject: Crates

Can you send me a picture of the crates you would like to purchase for the pilot sites. Why are the units not allowed to use flat tubs for mail?

Patricia A. King
Manager/Safety (A)
525 Royal Parkway
Nashville Tn 37229

615-885-9193
" Safety isn't expensive, it's priceless".

Baxter, Eric L - Nashville, TN

From: Walton, Corey L - Nashville, TN
Sent: Friday, August 29, 2014 8:43 AM
To: Baxter, Eric L - Nashville, TN
Subject: FW: tubs

From: Goetz, Bruce E - Eastern Area Office
Sent: Tuesday, August 05, 2014 7:39 AM
To: Walton, Corey L - Nashville, TN
Subject: RE: tubs

Since this is being grieved I am cautious to comment. My opinion doesn't speak for the entire Postal Service and depending on what level the grievance enters I will not provide my opinion.

Bruce E. Goetz
Eastern Area Safety Manager
5315 Campbells Run Rd
Pittsburgh PA 15205-7050

412-494-2039 office
412-979-4062 cell

From: Walton, Corey L - Nashville, TN
Sent: Thursday, July 31, 2014 6:15 PM
To: Goetz, Bruce E - Eastern Area Office
Subject: tubs

I am interested to know what your position on the mail being placed on the floor is. To me I think it is absurd that we would allow things that are currently in place ergonomically be taken away. Im not sure how the cosmetic aspect of it trumps the long term health of our letter carriers. I know Kim Alley is going to do what dillman tells her to. She wouldn't go against him if he said tell the carriers to stand in a fire pit all day. This is not a topic that should have to be grieved. Please let me know what the Eastern areas view on mail being placed on the floor instead of the standard tub is. As always thank you very much.

Corey

U237

September 17, 2014

Corey Walton,

Per your request for information extension, I am requesting the interview questions that you will be asking the author of the Eastern Area delivery foundation.

Thanks,

Eric Baxter

As per my conversation with Sandy Quick, I need the memo as stated on the 1767 s. The "Eastern Area Delivery Foundation" I will base my questions off of this memo. I will not be furnishing any questions to anyone in advance.

Thank you

Corey J Walton

HP Laserjet M2727nf MFP

Fax Confirmation Report

HP LASERJET FAX

Sep-17-2014 8:52PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
950	9/17/2014	8:51:34PM	Send	2569604	0:44	1	OK

UNITED STATES POSTAL SERVICE

STEP B DECISION

STEP B TEAM
Monica Lucas, USPS
Chris Verville, NALC

District: Tennessee
DRT Number: 147-14

Decision:	RESOLVED
USPS number:	C11N-4C-C 14118408
Grievant:	Class Action
Branch Grievance Number:	14-C-302
Branch:	62
Installation:	Chattanooga
Delivery Unit:	Citywide
State:	Tennessee
Incident Date:	02/13/2014 and Ongoing
Date Informal Step A Initiated:	No Meeting
Formal Step A Meeting Date	02/28/2014
Date Received at Step B:	03/04/2014
Step B Decision Date:	03/24/2014
Issue Code:	14.2100, 15.3200
NALC Code:	508399, 505011

ISSUE:

1) Did Management violate Article 14 of the National Agreement when they removed the inverted plastic buckets/flat trays from the orange plastic hampers (1046-P) therefore creating a bending and lifting safety hazard? Is so, what is the appropriate remedy?

2) Did Management violate Article 15 Section 3.A. and 19, via the Postal Service Policy Letter (M-01517), of the National Agreement by failing to comply with the grievance resolution/settlement dated March 4, 2003 for Grievance #Q98N-4Q-C 00099268, Step 4 Pre-Arbitration M-01477 in the Chattanooga Installation? If so, what is the appropriate remedy?

3) Did Management violate Articles 3, 5, 15, and 19, via the EL-801 Section 1-5, of the National Agreement when they failed to follow proper procedures when employees submitted a PS Form 1767 and abruptly discontinuing the procedures used to alleviate the Unsafe bending and lifting issues with the orange plastic hampers? If so, what is the appropriate remedy?

DECISION:

The Dispute Resolution Team (DRT) has **RESOLVED** this grievance. The DRT agrees Management's actions of instructing carriers to no longer use inverted plastic trays/tubs in the bottom of 1046-Ps, orange plastic hampers, to alleviate unsafe bending is in violation of the National Agreement. The DRT issues a cease and desist to Chattanooga Management of this practice. The DRT agrees Management of the Chattanooga Installation upon receipt of this decision will continue to allow carriers to utilize the false-bottom in the hampers as cited in M-01477.

EXPLANATION:

The Union contends on or about February 13, 2014 Management instructed carriers the inverted plastic buckets were to be removed from the orange plastic hampers. The Union contends Management in the Chattanooga Installation has failed to comply with M-01477 and a Step 4 Decision when they required carriers to utilize unsafe lifting practices when unloading parcels, trays of mail, and bundles of circulars from the bottom of the orange plastic hamper 1046-P which is in violation of Article 14 of the National Agreement. The Union contends it was stated by a Station Manager that due to the increase in parcels, and carriers having to make more than one trip to load their vehicle, it was a time saving issue and the less trips the carriers made there were less chances for slips, trips, or falls. Chattanooga Installation Management has been compliant with Step 4, M-01477, for many years, but when several stations were scheduled for route count and inspections the Chattanooga Installation Manager of Customer Service ordered all false bottomed/inverted tubs to be removed from the Plastic orange hampers. The Union contends Management has violated Article 15 Section 3.A. and the Postal Service Policy Letter (M-01517) via Article 19 of the National Agreement by failing to comply with a prior grievance settlement for grievance number Q98N-4Q-C 00099268. The Union contends Management's violations associated with this case are clearly knowing, intentional, and flagrant and this situation must be recognized when fashioning a remedy for this instant case. The Union requests Management's immediate compliance with the prior decisions for this matter by returning the inverted buckets/flat mail trays back to the orange plastic hampers (1046-P). The Union also requests a cease and desist in Management's actions and that each affected Letter Carrier paid a lump sum equal to $10.00 per calendar day from 2/28/14 until Management is deemed compliant.

Management contends the parcel count per route has increased greatly in the Chattanooga Installation in the past several months requiring more room in the carriers' hampers for parcels and additional mail items. Management contends the issue of removing the tubs from the 1046-P's is both a matter of time saving as well as safety. Management asserts the fewer trips an employee has to make across the floor the less chance there is of a slip, trip, fall, or running into or over someone else. Management contends there should not be an issue with employees removing parcels from hampers since most of the Chattanooga carriers, without specific medical documentation do so safely on a daily basis. Management contends the Union has been unsuccessful in evidencing a violation of the National Agreement and requests this grievance denied in its entirety.

Page 15-4 of the JCAM instructs the parties as follows:

> • **Safety and Health.** Article 14.2 provides that if an employee believes that he or she is being required to work under unsafe conditions, the employee may:

• Notify his/her steward. if available, who may discuss the alleged unsafe condition with the employee's supervisor;
• Notify his/her supervisor who will immediately investigate the condition and take corrective action if necessary;
• **If no corrective action is taken during the employee's tour, the steward may file a grievance at Formal Step A of the grievance procedure within fourteen days of notifying the employee's supervisor.**

The DRT agrees this instant grievance concerns safety. Therefore the Union correctly elevated this grievance directly to the Formal A level of the grievance procedure.

The Union held the following interview with Station Manager Dawson:

-Were you the person that made the decision to remove the plastic tubs from the 1046-P (plastic orange) hampers? Yes
-Were there any instructions or recommendations from any other person to do this? Recommendations from Route Count Team Leader Melissa Nichols.
-How long have the Orange Plastic hampers been used with the tubs turned upside down to prevent any lifting or bending hazards? I know of at least 6 years.

The grievance file contains multiple statements from carriers in the Chattanooga Installation revealing the tubs have been permitted in the bottom of the orange hampers anywhere from one to 28 years.

Pages 5-3 through 5-4 of the JCAM instruct the parties as follows:

> If a binding past practice clarifies or implements a contract provision, it becomes, in effect, an unwritten part of that provision. Generally, it can only be changed by changing the underlying contract language, or through bargaining.

The grievance file contains a copy of an E-mail from Peter Dechelle to Michael Whalen with the subject of Fw: Hampers with an attachment of M-01477 which was intended to be shared with the field.

The M-01477 Pre-Arbitration settlement for Grievance Number Q98N-4Q-C 00099268 reads as follows:

> The parties agree that placing inverted plastic trays in the bottom of the 1046-P hamper as an insert is one way, among others, to address any local bending and lifting concerns. **This agreement fully and completely resolves the issue of whether there is a bending/lifting hazard or violation of the National Agreement when city carriers use a 1046-P plastic hamper and, accordingly, will be applied to all disputes on this issue, including all grievances currently pending at any level of the grievance-arbitration procedure.**

M-01517, a letter from the Postmaster General, reads in relevant part as follows:

> Compliance with arbitration awards and grievance settlements is not optional. No manager or supervisor has the authority to ignore or override an arbitrator's award or a signed grievance settlement. Steps to comply with arbitration awards and grievance settlements should be taken in a timely manner to avoid the perception of non-compliance, and those steps should be documented.

The Supervisor's Safety Handbook, EL-801, instructs Management of their obligation to employees who have safety concerns as follows:

> When reporting hazards, your employees are encouraged to complete PS Form 1767, *Report of Hazard, Unsafe Condition, or Practice* (see Exhibit 1-5b). You must ensure that a supply of PS Forms 1767 is available in your work unit so that employees can obtain them while maintaining their anonymity. **The purpose of PS Form 1767 is to provide a channel of communication between employees and management that ensures prompt analysis and corrective action in response to reports of alleged hazards, unsafe conditions, or unsafe practices. Just as your employees have a responsibility to file reports of hazards, you have a responsibility to promptly (within your tour of duty) investigate the alleged hazard and respond to your employees using the blue copy of PS Form 1767. Resolve the hazard, unsafe condition, or practice issues if possible. Complete a work order and attach it to the top copy of PS Form 1767. Follow up to see that the hazard, unsafe condition, or practice has been corrected. Notify the employee of the results.**

The DRT agrees the grievance file contains three PS Form 1767s completed by carriers in the Chattanooga Installation which reveal the following:

-Red Bank—No Action taken on form
-Eastgate Brainerd-No Action taken on form
-Eastgate Chickamauga-No Action taken on form
-Eastridge-Carrier explains safety concerns and also cited the Step 4, M-01477. The Supervisor's actions—"Will review and forward to safety specialist for adjudication."

The grievance file reveals the PS Form 1767s submitted by carriers were not addressed as required in the EL-801 Handbook.

The grievance file contains Management's contentions which read in relevant part as follows:

> **The Union contends that there is a consistent need for the use of false bottoms in the 1046-P orange hampers. The need is to eliminate a safety hazard of lifting and bending. This has been addressed by Class Action M-01477 stating that the parties agree that placing inverted plastic trays in the bottom of a 1046-P plastic hamper as an insert is one way, among others, to address any local bending and lifting concerns.** The utilization of parcels in the bottom of the hampers and placing the mail on top of the parcels to make one trip to the vehicle is another way to address bending and lifting concerns. Management contends that the hampers are a safe and sufficient method to transport mail to and from the vehicle. The carriers should arrange their parcels to provide an area to load the trays of mail and flats on top of the parcels per Handbook PO-502 253.325. When false bottoms or inverted tubs are used most carriers are making multiple trips to the vehicle. The M-39 states that the carriers should take all mail for delivery to the vehicle at the same time using a hamper or other assigned conveyance. Avoid extra trips to the vehicle unless they are absolutely necessary due to the quantity of mail. The M-41 states that the carrier is required to load parcels directly into the vehicle from hampers or sacks.

The DRT agrees Management's contentions reveal the parties agreement on the utilization of inverted plastic trays in the bottom of 1046-Ps via M-01477.

The Dispute Resolution Team (DRT) has **RESOLVED** this grievance. The DRT agrees Management's actions of instructing carriers to no longer use inverted plastic trays/tubs

in the bottom of 1046-Ps, orange plastic hampers, to alleviate unsafe bending is in violation of the National Agreement. The DRT issues a cease and desist to Chattanooga Management of this practice. The DRT agrees Management of the Chattanooga Installation upon receipt of this decision will continue to allow carriers to utilize the false-bottom in the hampers as cited in M-01477.

This grievance file contained the following documents:

(1) Table of Contents Union
(2) PS Form 8190
(3) Issue Statement and Contentions (3 Pages)
(4) Answers to information request
(5) Interview with Station Manager Dawson
(6) Carriers' statements (10 pages)
(7) Interview with Station Manager Bryant
(8) PS Form 1767 (4 pages)
(9) Handbook EL-801 pages 4-6 (3 pages)
(10) JCAM pages 5-1 through 5-4 (4 pages)
(11) Union's Request for Information
(12) Union's Request for Steward Time
(13) Union's Request for Information (3 pages)
(14) Inventory of Pages
(15) Management's contentions
(16) M-01477
(17) Handbook M-41 page 46
(18) Handbook M-39 page 24
(19) Handbook PO-502 page 68

In reaching the above decision, the DRT carefully reviewed each of the documents and placed the appropriate value to each as it applied to the issue in this grievance.

Monica Lucas
USPS Step B Representative

Chris Verville
NALC Step B Representative

DRT Number: 147-14

Cc: Pete Moss, NALC NBA, Region 8
Karen Barber, Eastern Area Labor Relations Manager (A)
Michael Kulikowski, Eastern Area Labor Relations Office
Richard Dahlke, USPS Step A Representative
Tammia Sneed, NALC Step A Representative
David Dillman, District Manager
Charisse Gamble, District Human Resources Manager
Joel Barnes, District Labor Relations Manager

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UNITED STATES POSTAL SERVICE®

Date Received at Step B (MM/DD/YYYY)

USPS-NALC Joint Step A Grievance Form

INFORMAL STEP A — NALC Shop Steward Completes This Section *(See instructions on page 2.)*

1. Grievant's Name *(Last, first, middle initial)*: CLASS ACTION
2. Grievant's Telephone No. *(Include area code)*:
3. Seniority Date *(MM/DD/YYYY)*:
4. Status *(Check one)*: ☐ FT ☐ FTF ☐ PTR ☐ PTF ☐ CCA
5. Grievant's Employee Identification Number (EIN):
6. District, Installation, Work Unit, ZIP Code®: TN,NASHVILLE,BELLE MEADE 37205
7. Finance No.:
8. NALC Branch No.:
9. NALC Grievance No.: B4-0072814
10. Incident Date *(MM/DD/YYYY)*: ONGOING
11. Date Discussed With Supervisor *(Filing date)*: 9/22/2014
12a. Companion MSPB Appeal? ☐ Yes ☐ No
12b. Companion EEO Appeal? ☐ Yes ☐ No
13a. Supervisor's Printed Name, Initials, and Telephone No.: Eric Baxter (EB)
13b. Steward's Printed Name, Initials, and Telephone No.: Corey L. Walton cw

FORMAL STEP A — Formal Step A Parties Complete This Section *(See instructions on page 2.)*

14. USPS Grievance No.: Obtain prior to Formal Step A meeting. 1430634

15. Issue Statement: Provide contract provision(s) and frame the issue(s).

DID MANGEMENT VIOLATE ARTICLE 15, AND 19 OF THE NATIONAL AGREEMENT WHEN THEY REFUSED TO LET CARRIERS HAVE TRAYS AVAILABLE TO THEM UNDER THEIR CASES? IF SO WHAT IS THE APPROPRIATE REMEDY

16. Undisputed Facts: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☐ Yes Number ____

BOTH PARTIES HAVE AGREED TO EXTEND THE TIME LIMITS ON THIS GRIEVANCE. THE GRIEVANCE IS TIMELY

17. UNION'S full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☐ Yes Number ____

18. MANAGEMENT'S full, detailed statement of disputed facts and contentions: List and attach all supporting documents. Use additional paper if necessary. Attachments? ☐ No ☐ Yes Number ____

19a. Union Representative: Enter the remedy requested by the union.

MANAGEMENT CEASE AND DESIST. CARRIERS BE ALLOWED TO STORE TRAYS AT THEIR CASES AS THE B-TEAM HAS AWARDED OR WHATEVER REMEDY IS DEEMED APPROPRIATE

19b. Settlement Offer: List any settlement offers by either party on page 3.

20. Disposition *(Check one)* ☒ Resolved ☐ Withdrawn ☐ Not Resolved — Date of Formal Step A Meeting *(MM/DD/YYYY)*: 11/7/2014

21a. USPS Representative's Name: Sherry L. Carr
21b. Telephone No. *(Include area code)*:
21c. USPS Representative's Signature: Sherry Carr
21d. Date *(MM/DD/YYYY)*:
22a. NALC Representative's Name: Donald S. Onorato
22b. Telephone No. *(Include area code)*:
22c. NALC Representative's Signature: Donald S. Onorato
22d. Date *(MM/DD/YYYY)*:

FORMAL STEP A RESOLUTION FORM

NALC GRIEVANCE NUMBER: **B4-00728-14**

USPS GRIEVANCE NUMBER: **C11N-4C-C 14306314**

GRIEVANT NAME: **CLASS ACTION**

STATION/POST OFFICE: **BELLE MEADE / NASHVILLE**

DATE OF DECISION: **NOVEMBER 7, 2014**

The issue of this grievance pertains to:

DID MANAGEMENT VIOLATE ARTICLES 15 AND 19 OF THE NATIONAL AGREEMENT WHEN THEY REFUSED TO LET CARRIERS HAVE TRAYS AVAILABLE TO THEM UNDER THEIR CASES.

As a result of a Formal Step A meeting of the Dispute Resolution Process we the parties agree to the following resolution of this grievance:

THE PARTIES AGREE THAT MANAGEMENT WILL COMPLY WITH THE STEP B DECISION FOR B4-00200-14 C11N-4C-C 14260088 AND ALLOW CARRIERS TO STORE THE HARD PLASTIC TRAYS AT THEIR CASES.

NALC REPRESENTATIVE

USPS REPRESENTATIVE

U245

UNITED STATES POSTAL SERVICE

STEP B DECISION

STEP B TEAM
Monica Lucas, USPS
Chris Vorvillo, NALC

District: Tennessee
DRT Number: 440-14

Decision:	RESOLVED
USPS number:	C11N-4C-C 14260088
Grievant:	Class Action
Branch Grievance Number:	B4-00200-14
Branch:	4
Installation:	Nashville
Delivery Unit:	Woodbine
State:	Tennessee
Incident Date:	Ongoing
Date Informal Step A Initiated:	03/05/2014
Formal Step A Meeting Date	08/14/2014
Date Received at Step B:	08/18/2014
Step B Decision Date:	09/03/2014
Issue Code:	05.0000, 19.2000
NALC Code:	600109, 100103

ISSUE:

Did Management violate Articles 3, 5, 15, and 19 of the National Agreement when they instructed the Letter Carriers to keep empty trays and other essential items, used for the delivery of mail, stored away from their cases and at newly designated locations when well established Past Practices and M-39 Handbook SOP are at variance with these instructions? If so, what is the appropriate remedy?

DECISION:

The Dispute Resolution Team (DRT) has RESOLVED this grievance. The DRT agrees the parties' will remain compliant with the following language cited from the National AM SOP as follows:

> 3-4 Empty Equipment—The workroom floor must be clear from excess, empty equipment. As clerks spread mail, empty equipment must be removed and placed in containers for return to the plant in a timely manner. All labels must be removed from mail transport equipment, whether trays, tubs, or rolling stock when the equipment is emptied.
>
> The disposal of empty equipment returned from the street is the responsibility of the carrier. Many carriers reuse equipment daily such as hard plastic trays. These are typically

1

retained overnight at the carrier case. Excess letter carrier equipment to be returned usually consists of DPS letter trays. Empty equipment containers must be pre-positioned in the carrier's line of travel for the carrier to deposit excess letter trays and other commonly used equipment upon their return from the street.

EXPLANATION:

The Union filed this grievance upon the Woodbine Post Office Management instructing Letter Carriers to discontinue staging empty equipment at their cases, in contradiction to a valid past practice for the office. The Union contends the carriers' submitted statements reveal the parties' past practice. The Union contends sections 115 and 116 of the M-39 Handbook reveals the past practice of storing trays and other essential items at the carrier's case and the Union contends Management is attempting to alter a past practice based upon contractual language without bargaining with the Union. The Union also notes Management unilaterally changed the way empty equipment was stored with no input from the Union. The Union contends the changes were also to the detriment of efficient operations. The Union alleges a contractual violation of Articles 5 and 19 of the National Agreement upon the implementation of this new policy requiring carriers to store equipment required to perform daily duties away from their cases. The Union notes Management has violated Section C of Article 3 in establishing a policy which adds extra cost to the company as the carriers are using more office time in search of equipment. The Union requests any discipline issued as a result of this policy be rescinded and removed from the carriers' files as well as the rescinding of this policy immediately.

Management contends Article 3 of the National Agreement gives them the right to direct employees in the performance of their official duties. Management determines the methods, means, and personnel by which said operations are to be conducted. Management cited the Eastern Area Operations Standard Operating Procedure/Red-Line Policy in defense of their arguments. Management notes OSHA citations have occurred within the Nashville installation and contends it is every employee's right to work in a safe environment. Management must also meet obligations to their employees and keep safety on everyone's mind. Management contends the change implemented in the Eastern Area, Nashville specific, contain efforts to keep the employee safe. One of OSHA's most recent visits in the Nashville installation reveals citations for passageways not being kept clean and orderly, cluttered work areas, and mail on the floor. OSHA also stated carriers need 28" of space to exit from their cases and some measured smaller due to mail, boxes, and mail trays in front of, next to, and around the area. Moving the trays and centralizing empty equipment is necessary. Besides good housekeeping, we are creating a safer work environment for our employees. Management contends no discipline has been issued for alleged violation of this rule. Management requests this grievance denied in its entirely.

Article 3 of the National Agreement reads as follows:

> The employer shall have the exclusive right, subject to the provisions of this agreement and consistent with applicable laws and regulations:
> a. to direct employees of the employer in the performance of official duties;
> B. to hire, promote, transfer, assign, and retain employees in positions within the Postal Service and to suspend, demote, discharge, or take other disciplinary action against such employees;
> c. to maintain the efficiency of the operations entrusted to it;
> d. to determine the methods, means, and personnel by which such operations are to be conducted;

e. to prescribe a uniform dress to be worn by letter carriers and other designated employees; and
f. to take whatever actions may be necessary to carry out its mission in emergency situations, i.e., an unforeseen circumstance or a combination of circumstances which calls for immediate action in a situation which is not expected to be of a recurring nature.

The grievance file reveals the efficiency of the operations was not met according to separate carrier statements revealing they were required to search for empty equipment at length to perform their jobs on a daily basis. The DRT agrees the inefficiency is due to the lack of availability of empty equipment.

The parties agreed to the following language on pages 5-2 and 6-3 of the July 2014 Joint Contract Administration Manual:

Defining Past Practice
In a paper given to the National Academy of Arbitrators, Arbitrator Mittenthal described the elements required to establish a valid past practice:
• First, there should be clarity and consistency. A course of conduct which is vague and ambiguous or which has been contradicted as often as it has been followed can hardly qualify as a practice. But where those in the plant invariably respond the same way to a particular set of conditions, their conduct may very well ripen into a practice.
• Second, there should be longevity and repetition. A period of time has to elapse during which a consistent pattern of behavior emerges. Hence, one or two isolated instances of certain conduct do not ordinarily establish a practice. Just how frequently and over how long a period something must be done before it can be characterized as a practice is a matter of good judgment for which no formula can be devised.
• Third, there should be acceptability. The employees and supervisors alike must have knowledge of the particular conduct and must regard it as the correct and customary means of handling a situation. Such acceptability may frequently be implied from long acquiescence in a known course of conduct. Where this acquiescence does not exist, that is, where employees constantly protest a particular course of action through complaints and grievances, it is doubtful that any practice will be created.
• One must consider, too, the underlying circumstance which give a practice its true dimensions. A practice is no broader than the circumstances out of which it has arisen, although its scope can always be enlarged in the day-to-day administration of the agreement. No meaningful description of a practice can be made without mention of these circumstances. For instance, a work assignment practice which develops on the afternoon and midnight shifts and which is responsive to the peculiar needs for night work cannot be automatically extended to the day shift. The point is that every practice must be carefully related to its origin and purpose.
• Finally, the significance to be attributed to a practice may possibly be affected by whether or not it is supported by mutuality. Some practices are the product, either in their inception or in their application, of a joint understanding; others develop from choices made by the employer in the exercise of its managerial discretion without any intention of a future commitment.

To implement contract language. Contract language may not be sufficiently specific to resolve all issues that arise. In such cases, the past practice of the parties provides evidence of how the provision at issue should be applied. For example, Article 15, Section 2, Step 3 of the 1978 National Agreement (and successor agreements through the 2000 National Agreement) required the parties to hold Step 3 meetings. The contract language, however, did not specify where the meetings were to be held. Arbitrator Mittenthal held that in the absence of any specific controlling contract language, the Postal Service did not violate the National Agreement by insisting that Step 3 meetings be held at locations consistent with past practice (N8-NAT-0006, July 10, 1979, C-03241).

The grievance file contains several carrier statements revealing the allowance of storing empty equipment at their cases, via a mutually recognized past practice.

The section 116.52 of the M-39 handbook read as follows:

> 116.52 Second Priority
> Flat mail, faced and loose in trays and identified by route number, is placed as close to the carrier's work area as possible where carriers can readily obtain them. If empty trays will be needed late, they may be stored under the carrier's case.

Management utilizes the Eastern Area Red-line Policy in defense of their actions. The DRT agrees the case file contains a settlement at the Formal A level regarding the SOP as follows;

> The Formal Step A parties' agree that the Nashville Installation shall follow the Postal Handbooks/Manuals and the currently enforced National AM City Carrier AMSOP.

The DRT agrees the Eastern Area Red-line Policy cited by Management is no longer in use at the Woodbine Post Office. The DRT agrees Management has also failed to evidence how the carriers' deposition of empty equipment has posed a safety concern in the Woodbine office.

Article 19 of the National Agreement reads in relevant part as follows:

> Those parts of all handbooks, manuals and published regulations of the Postal Service, that directly relate to wages, hours or working conditions, as they apply to employees covered by this Agreement, shall contain nothing that conflicts with this Agreement, and shall be continued in effect except that the Employer shall have the right to make changes that are not inconsistent with this Agreement and that are fair, reasonable, and equitable. This includes, but is not limited to, the Postal Service Manual and the F-21, Timekeeper's Instructions.

The Dispute Resolution Team (DRT) has RESOLVED this grievance. The DRT agrees the parties' will remain compliant with the following language cited from the National AM SOP as follows:

> 3-4 Empty Equipment--The workroom floor must be clear from excess, empty equipment. As clerks spread mail, empty equipment must be removed and placed in containers for return to the plant in a timely manner. All labels must be removed from mail transport equipment, whether trays, tubs, or rolling stock when the equipment is emptied.
>
> The disposal of empty equipment returned from the street is the responsibility of the carrier. Many carriers reuse equipment daily such as hard plastic trays. These are typically retained overnight at the carrier case. Excess letter carrier equipment to be returned usually consists of DPS letter trays. Empty equipment containers must be pre-positioned in the carrier's line of travel for the carrier to deposit excess letter trays and other commonly used equipment upon their return from the street.

This grievance file contained the following documents:

(1) PS Form 8190
(2) Union Contentions, 5 pages

(3) Grievant's Statement, 2 pages
(4) Union Steward's Statement
(5) Carrier's Statement, 2 pages
(6) M-39 pages 7, 6, 10, 3 pages
(7) Note from Manager
(8) Formal A Resolution
(9) PS Form 8190
(10) AM SOP
(11) JCAM pages 5-1 – 5-4, 4 pages
(12) Management's Contentions, 5 pages
(13) Letter to Safety Manager from US Department of Labor/OSHA, 5 pages

In reaching the above decision, the DRT carefully reviewed each of the documents and placed the appropriate value to each as it applied to the issue in this grievance.

Monica Lucas
Monica Lucas
USPS Step B Representative

Chris Verville
NALC Step B Representative

DRT Number: 440-14

Cc: Pete Moss, NALC NBA
Roberta Albright, Eastern Area Labor Relations Manager
Michael Kulikowski, Eastern Area Labor Relations Representative
Sherry Carr, USPS Step A Representative
Donald Onorato, NALC Step A Representative
David Dillman, District Manager
Charisse Gamble, District Human Resources Manager
Joel Barnes, District Labor Relations Manager

5

REGULAR ARBITRATION PANEL

In the Matter of Arbitration	)	GRIEVANT: Class Action
	)	POST OFFICE: Clarksville, TN 37040
Between	)	
	)	CASE NO.: CI1N-4C-C 14123103
UNITED STATES POSTAL SERVICE	)	NALC NO.: 1414C4023
and	)	
THE NATIONAL ASSOCIATION OF LETTER CARRIERS	)	

BEFORE: **Glenda M. August, Arbitrator**

APPEARANCES:

For the USPS:	Brian K. Wiley
For the NALC:	Antonia Shields
Place of Hearing:	Clarksville, TN. 37040
Date (s) of Hearing:	September 24, 2014
Briefs Received:	October 6, 2014
Date of Award:	November 5, 2014
Relevant Contract Provision:	Articles: 3, 5, & 15
Contract Year:	2011-2016
Type of Grievance:	Contract

AWARD SUMMARY: The grievance is sustained. Management at the Clarksville Post Office shall return to the practice of City Letter Carriers handling ADVO on office time and cease and desist making unilateral changes regarding that valid past practice.

Glenda M. August

GLENDA M. AUGUST
Arbitrator

I. ISSUE (S)

(1) Did Management violate Articles 15, 17, and 31 of the National Agreement during the processing of this grievance? If so, what is the appropriate remedy?

(2) Did local Management violate Article 5 of the National Agreement when they changed the past practice of allowing letter carriers to sort/tray/the ADVO/Marriage Mail bundles to delivery sequence while on office time? If so, what is the appropriate remedy?

(3) Did local Management violate Arbitration decision, case No: B06N4BC 09175879 when they failed to give advance notice to the Union of their termination of a past practice, thereby failing to bargain in good faith? If so what is the appropriate remedy?

(4) Did local Management violate Handbook M-39, via Article 19 of the National Agreement when they changed the past practice of allowing letter carriers to sort the ADVO bundles in delivery sequence while on office time? If so, what is the appropriate remedy?

(5) Did local Management violate Article 14 of the National Agreement when they instructed clerks to place all ADVO's/Marriage Mail bundles in the bottom of the carrier gurneys/buggies? If so, what is the appropriate remedy?

II. RELEVANT CONTRACT PROVISIONS

ARTICLE 3
MANAGEMENT RIGHTS

The Employer shall have the exclusive right, subject to the provisions of this Agreement and consistent with applicable laws and regulations:
A. To direct employees of the Employer in the performance of official duties;
B. To hire, promote, transfer, assign, and retain employees in positions within the Postal Service and to suspend, demote, discharge, or take other disciplinary action against such employees;
C. To maintain the efficiency of the operations entrusted to it;
D. To determine the methods, means, and personnel by which such operations are to be conducted;
E. To prescribe a uniform dress to be worn by letter carriers and other designated employees; and
F. To take whatever actions may be necessary to carry out its mission in emergency situations, i.e., an unforeseen circumstance or a combination of circumstances which calls for immediate action in a situation which is not expected to be of a recurring nature.
(The preceding Article, Article 3, shall apply to City Carrier Assistant Employees.)

ARTICLE 5
PROHIBITION OF UNILATERAL ACTION

The Employer will not take any actions affecting wages, hours and other terms and conditions of employment as defined in Section 8(d) of the National Labor Relations Act which violate the terms of this Agreement or are otherwise inconsistent with its obligations under law.
(The preceding Article, Article 5, shall apply to City Carrier Assistant Employees.)

ARTICLE 15
GRIEVANCE-ARBITRATION PROCEDURE

Section 1. Definition
A grievance is defined as a dispute, difference, disagreement or complaint between the parties related to wages, hours, and conditions of employment. A grievance shall include, but is not limited to, the complaint of an employee or of the Union which involves the interpretation, application of, or compliance with the provisions of this Agreement or any local Memorandum of Understanding not in conflict with this Agreement.

II. FACTS

On March 11, 2014, the Supervisor at the Clarksville Post Office advised carriers that Advo bundles would no longer be sorted on office time. The Union alleged a "Past Practice" existed in Clarksville which allowed carriers to handle Advo and other sequenced mailings on office time. In protest, the Union filed the instant grievance alleging a violation of Article 5 (Prohibition of Unilateral Action) of the National Agreement.

III. UNION'S CONTENTIONS

It was the position of the Union that handling Advo and other sequenced bundles of mail on office time was a long-standing past practice in the Clarksville, Tennessee Post Office. However, according to the Union, on March 11, 2014, Management unilaterally changed that practice and directed carriers to begin taking Advo directly to the street. After that date, the Union claimed that sequence mail, like Advo, was placed directly into the gurney assigned to each route. They maintained that carriers then would have to bend into the gurney to handle and sort the mail for delivery after leaving the office.

The Union cited the Joint Contract Administration Manual (JCAM) at Article 5 in support of

their position in this case and stated that Management did not notify the Union and provide an opportunity for good faith bargaining prior to making the change regarding the Advo mail. In their contentions, the Union stated that in the JCAM Arbitrator Mittenthal described the elements required to establish a valid past practice:

- First, there should be clarity and consistency.
- Second, there should be longevity and repetition.
- Third, there should be acceptability.
- One must consider, too, the underlying circumstance which gives a practice its true dimensions.
- Finally, the significance to be attributed to a practice may possible be affected by whether or not it is supported by mutuality.

The Union argued that when the Postal Service seeks to change or terminate a binding past practice implementing conditions of employment concerning areas where the contract is silent, Article 5 prohibits it from doing so unilaterally without providing the union appropriate notice. Prior to making such a change unilaterally, the Postal Service must provide notice to the union and engage in good faith bargaining over the impact on the bargaining unit. According to the Union, in the case of the changes made in Clarksville regarding the handling of Advo sequenced mailings, this did not occur. They contended that the changes were made by Management and the union was told to file a grievance. They cited testimony from the Postmaster who arrived in Clarksville on March 3, 2014, and the changes were implemented on March 11, 2014. The Postmaster testified that he did not meet with the union before implementing the change that was intended to prevent time-wasting practices.

It was argued by the Union that the Clarksville, TN Post Office had a valid past practice of allowing letter carriers to sort and tray ADVO's on office time and the sequencing and traying of ADVO's on office time was a mutually accepted method of performing this work in Clarksville for more than 29 years. They added that Management did not provide any proof disputing that process. The Union noted that the longevity of this practice was consistent with Arbitrator Mittenthal's conclusion that this practice was accepted by the parties and had become an integral part of the agreement with just as much force as any written provision.

The Union cited several regional arbitration decisions, in which Arbitrators reviewed Past Practice and upheld the Union's position regarding notification and good faith bargaining when changing a valid past practice. Based on their arguments and the evidence they provided in the instant grievance, the Union requested that the grievance be sustained in its' entirety and the remedy as requested be granted.

IV. MANAGEMENT'S CONTENTIONS

Management argued that the handling of ADVOs in the Clarksville Post Office, prior to the new policy, was not a valid past practice. They based their position and arguments on the fact that the first element of past practice established by National Arbitrator Mittenthal was that there must be clarity and consistency. Management further argued that regarding ADVO handling, some carriers cut them in the office and some cut them on the street as testified by the Clarksville, Carrier Supervisor, and that could hardly be labeled as clear and consistent.

Management argued against the Union's position that the contract was silent regarding allowing letter carriers to sort/tray ADVO on office time. They contended the contract was not silent on this issue as seen in the M-39 and M-41 Handbooks via Article 19 of the National Agreement. Management stated that in M00600, from the National Joint City Delivery Meeting in November 1983, Postal Service Management advised: ***"There was some discussion about whether the preparation of simplified address mail for delivery should be performed in the office or on the street. Management said it did not see a problem with whether the preparation of delivery is accomplished in the office or on the street, so long as the preparation time was credited somewhere, either as office or as street time."*** This, Management argued, established that the national parties clearly agreed to credit time for preparation of ADVO and the language in M00600 granted Management the ability to determine the most efficient and economical means for preparation. Management cited several Regional Arbitration decisions regarding the handling of sequenced mail and relied on those Awards to support their position. They specifically reviewed a decision by Arbitrator Axon in Case Number F94N-4F-C 97069553, where he opined that *"The evidence also shows no letter carrier suffered any loss in wages or benefits because of the decision by management marriage mail would not be counted in the post office..." "The Arbitrator finds no major condition of employment was changed or eliminated...this is not the type of major issue*

management is obligated to bargain over. No terms of the Agreement or any regulation were cited by the Union was violated when management issued an instruction as to where marriage mail would be counted... The arbitrator respectfully disagrees with the Union that the place where management permitted letter carriers to count marriage mail constituted a binding past practice that the Postal Service could not alter without bargaining with the Union. This is the type of situation where the parties have already bargained the issue. In Article 3..." "...management's instruction where marriage mail would be counted fell precisely into the managerial prerogatives retained by the Postal Service to direct the work force. When the Postal Service has retained the right to make a business decision, the right is not qualified by the condition management must make a correct decision."

Citing prior Arbitration decisions and applying the elements of a past practice as noted in the JCAM, Management argued that the old method of handling the bundles of ADVO in the Clarksville Post Office did not qualify as a past practice. They noted that several regional Arbitrators have held that unless wages and benefits are affected, it is not a protected past practice.

Management drew attention to the fact that the Union argued it was a practice during route counts that the handling of ADVOs was recorded on office time but noted that the Union failed to produce evidence in the form of an 1838C (Route Count and Inspection documentation) to support their argument. They contended that the Union testified that they were never notified of the change yet advised in the Joint File that "management gave a direct order on 3/11/2014 the date of terminating the past practice...the Branch President did inform management at the time of the direct order (3/11/14) that a Past Practice existed". They further contended that the Union did not demonstrate a violation of the handbooks in question, and clearly the cutting of straps can be done on the street as easily as it is done in the office.

Finally, Management averred that the Union had the burden of proof in this contract case and they have not proved any violation of the Agreement. They argued that it is Management's right under Article 3 to implement the new policy because they are responsible for the efficiency of the entire operation and the new policy provided more efficient use of the clerk operation in the distribution of the bundles. For those reasons they requested that the instant grievance be denied in its' entirety.

V. DISCUSSION

ARTICLE 5

PROHIBITION OF UNILATERAL ACTION

The Employer will not take any actions affecting wages, hours and other terms and conditions of employment as defined in Section 8(d) of the National Labor Relations Act which violate the terms of this Agreement or are otherwise inconsistent with its obligations under law.

(The preceding Article, Article 5, shall apply to City Carrier Assistant Employees.)

National Labor Relations Act, Section 8: UNFAIR LABOR PRACTICES

Sec. 8. § 158.

(d) ***Obligation to bargain collectively*** For the purposes of this section, to bargain collectively is the performance of the mutual obligation of the employer and the representative of the employees to meet at reasonable times and confer in good faith with respect to wages, hours, and other terms and conditions of employment, or the negotiation of an agreement or any question arising thereunder, and the execution of a written contract incorporating any agreement reached if requested by either party, but such obligation does not compel either party to agree to a proposal or require the making of a concession: Provided, That where there is in effect a collective-bargaining contract covering employees in an industry affecting commerce, the duty to bargain collectively shall also mean that no party to such contract shall terminate or modify such contract, unless the party desiring such termination or modification—

In an attempt to facilitate the resolution of disputes regarding issues on which the national parties agree, the United States Postal Service and the National Association of Letter Carriers prepared the Joint Contract Administration Manual. The Manual, last updated in July 2014, discussed the provisions of Article 5, Unilateral Action, as it pertains to Past Practice. While the parties agree the explanation is not exhaustive, they do agree that some labor disputes require the examination of the past practices of the parties, and each side is cautioned to ensure the "facts surrounding a dispute in which past practice plays a part are surfaced and thoroughly developed so an informed decision can be made". This is the case in the instant matter.

The parties in the Clarksville, Tennessee Post Office differ on the matter of the handling of ADVO mailers. Management, led by a newly appointed Postmaster, decided on March 11, 2014, that a change needed to be made regarding how carriers handled sequenced bundles of mail. Prior to

that time, ADVO mailers were placed at the carrier case for them to cut the straps and place the mail in trays or prepare for delivery in some manner. Management, allegedly in an effort to make the task more efficient, requested the clerks in that office to instead place the bundles in each carriers "gurney". This change meant the carrier would not cut the straps or prepare the mail for delivery until they "moved to the street". The Union and its' members were notified on the date of the change that the previous practice was eliminated and from that day forward, the bundles would not be placed at their case. Citing Article 5, the Union protested and filed the instant grievance, claiming the long-standing past practice of handling ADVO mail in the office was unilaterally changed by Management, without prior notice and without engaging the Union in any good faith bargaining attempt.

The JCAM is clear in regard to Past Practice. At Article 5, the Parties looked to National Arbitrator Richard Mittenthal when they defined past practice; regarding the instant case and that definition, I find that there was

- **Clarity and consistency**; no prior grievances filed and both carriers and Management stipulated that the handling of Advo was being done on office time, hence the need to change the process.
- **Longevity and repetition**; numerous carriers provided written statements of when they first began preparing ADVO in the office and advised that they continue until the present to do so. Management likewise found the new to implement a new process.
- **Acceptability**; upon a change in Management, there was a change to the process, until that time there were no previous grievances (at least none cited in this case).
- **A meaningful description of the practice**; when considering the underlying circumstances which gives a practice is true dimensions, the practice of how ADVO mail was prepared for delivery can be easily related to its' origin and purpose. Carriers felt it was more beneficial to have the tools necessary to cut the straps, and waste containers to place the debris, as well as the opportunity to lift the bundles from their case instead of digging them out of the gurneys (an issue disclosed at hearing). This practice evidently was one implemented in many offices since it was discussed at the National Level and made a point of agreement between the parties at the National Joint City Delivery Committee Meeting, held November 16, 1993. As memorialized in M-00600-"Management said it did not see a problem with whether the preparation for delivery is accomplished in the office or on the street, so long as the preparation time as credited somewhere, either as office time or as street time." This would provide an indication that the practice had a meaningful purpose and was implemented at other offices as well.

- **Supported by mutuality**; the fact that incoming Management had to implement a "new process" means there was another process in place. Whether Management was simply silently in agreement, or prior Management implemented the office time procedures for ADVO handling, the longevity of the practice demonstrated that it was mutually supported.

In support of Management's arguments, they may have made a change to the practice in an attempt to increase efficiency in its' overall operation, however, no advanced notice was provided to the Union. Advanced notice would have provided an opportunity for the parties to bargain in good faith and possibly find common ground which would have eliminated some time-wasting practices in the sequenced mail scenario defined by Management (clerks delivering the bundles to the carriers and the carriers then preparing for delivery).

In case number B11N-4B-C 13228939, Arbitrator Sherrie Rose Talmadge, reviewed an Article 5 violation, regarding past practice and offered the following:

> Management did not provide the Union with advance notice and sufficient opportunity to bargain over the proposed termination of the ergo stretch program. The Postmaster provided the Union minimal notice on or about the same day that he met with the Union to discuss the elimination of the ergo stretch program. There was insufficient advance notice to the Union to give them an opportunity to prepare to bargain over the Service's proposal to eliminate the practice.

Likewise, in the case at bar the notice provided by Management was on the day the change was implemented. The opportunity to bargain in good faith was not provided; an opportunity which may have allowed the parties to reach an agreement that included a change in the process. The Union cited further support for their position regarding the need for notification and good faith bargaining. They offered the decision of Arbitrator Jonathan I. Klein; in case number C06N-4C-C 10346317, he discussed the JCAM provisions and appropriate notice:

> Consistent with the lack of the required notice there is no evidence that the Postal Service engaged in good faith bargaining with the Union over the impact of the proposed changes on the bargaining unit with the requisite exchange of positions and information for and against the changes. Although it may be the case that the changes implemented by the Postal Service in connection with the sorting and distribution of caller service mail have, in fact, increased the operational efficiency and economy of the Downtown Station, the fact remains that the Postal Service is required to notify the Union of its proposed changes and then engage in good faith bargaining over such changes.

Both Arbitrators make a case for sustaining the instant grievance. The Union in this case established that a valid Past Practice existed. They also supported their argument that Management failed to provide notice to the Union, other than advising that the practice was eliminated, on the day the change was to take place. Having met their burden, the grievance must be sustained.

Regarding remedy, the Union requested a payment of $5.00 per day per carrier from the date of implementation. Management testified that although a standup talk was held with carriers on March 11, March 20, April 1 and May 2, of 2014, the Supervisor has not disciplined any carrier to date for not following the instructions and advised that carriers are still using the old practice. Management advised that the only portion of the practice that has changed is where the bundles are placed; they continue to place the sequenced mail in the carrier's hampers/buggies instead of placing them on the floor at the carrier's case. Additionally, in light of the fact that the Class was not affected by any loss of wages or benefits, there are no specific damages to address regarding loss of payment and therefore no precedent for the requested payment.

For the foregoing reasons, the grievance is sustained. Management at the Clarksville Post Office shall return to the practice of City Letter Carriers handling ADVO on office time and cease and desist making unilateral changes regarding that valid past practice.

AWARD

The grievance is sustained. Management at the Clarksville Post Office shall return to the practice of City Letter Carriers handling ADVO on office time and cease and desist making unilateral changes regarding that valid past practice.

Glenda M. August

GLENDA M. AUGUST
Arbitrator

November 5, 2014
New Iberia, LA

MANAGEMENT'S CONTENTIONS
ARTICLE 8.5.g GRIEVANCE
BELLE MEADE
FOR ALLEGED VIOLATIONS ON STAGING FLATS
LOCAL UNION #B4-00729-14
GATS #14306320

Union contentions:
Did management violate Articles 5,14,15,& 19 of the National Agreement when they began staging flat mail directly on the ground at carriers cases rather than in flat tubs? Also did management violate 17 & 31 by not providing requested information?

Management has provided local NALC a copy of the AMSOP.

Section 3-6 Mail Spreading SOP
3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:
- ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).
- ALL mail with any future day's color code shall be placed on the floor on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- All mail will be placed neatly as close as possible next to the case legs.
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats
- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- *Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.*
- *ALL labels are to be removed from empty equipment.*

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) or on the floor if no fibredome. AFSM Standard mail is assumed to be for today's delivery. *All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse.*

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) or on the floor if no fibredome after the flats have been measured by the supervisor/manager.

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker.

Several of the carriers at Belle Meade filed a 1767, Report of Hazard, Unsafe Condition or Practice.
The general concensus was that staging flats on the floor, loose, not in flat tubs is hard on their backs, knees, and excessive repetitive motion.

The supervisor, Beverly Montgomery, responded with the same answer on all 1767,s.
"The process of staging banded flats already on the floor at the corners of the case is part of the Eastern Area Foundation. The ledges will be loaded the 4-6 inches stacks. Volume in excess of this shall be neatly stacked on the floor beside the case in stacks of no more than 3 ft high. When the ledge is empty carriers will replenish the ledge with stacks from the floor, remove all the plastic shrink wrap at that time. Refresher training will be given to all the employees on proper lifting."

The manager, Eric Baxter, responded to all the same also:
" Housekeeping and safety is everyone's responsibility. Work areas must be kept neat and free of clutter. Proper egress must be maintained at all times."

Management is abiding by the Eastern Area and the AMSOP.

Attachments:
AMSOP
1767's

INTRODUCTION

The AM SOP Review is to be utilized in all EAS-22 and higher level offices including all subordinate facilities and all Flats Sequencing (FSS) Sites. The unit that has successfully pass the AM SOP Review has achieved a well defined high level of efficiency determined by accomplishments in implementing standardized operating procedures and in successfully demonstrating performance at or above targeted performance factors in Customer Services and Delivery Operations. The achievement for this status requires a high level of commitment and cooperation between Mail Processing, In-Plant Support, Transportation, District Operations Programs Support, and local management.

Mail Processing and Transportation must provide a high level of support to the AM SOP Office documented by an established, comprehensive Integrated Operating Plan (IOP) which includes components for tracking, communication, feed back and problem resolution (*While it is recognized that the resources may not be available to provide this level of support for all similar sized offices, this level of support should be pursued in each AM SOP Office*).

This AM SOP Review Implementation Guide outlines the general parameters and targets which define:

- Stabilizing mail flows
- Increase use of automation
- Designing effective and manageable unit work floors and work flow
- Efficient distribution equipment, carrier equipment and equipment configuration
- Establishing Standard Operating Procedures (SOPs) for supervisor, carrier and clerk processes
- Using data and tools in managing customer service and delivery operations

The *following pages* contain specific targets by operation as well as guidance on how to achieve the targets. The *Guide* also references the Standard Operating Procedures (SOPs) which support the overall AM SOP effort. The ultimate goal of the AM SOP concept is to spread standardized methods and processes to all delivery units, creating exceptional external and internal service while promoting cost efficiency and supporting corporate 24 hour clock targets.

1 AUTOMATION

1-1 DPS Achievement - An AM SOP Office is a unit that has achieved a DPS percent of 85% or higher consistently over the most recent 4-week period. Implementing the following processes will ensure maximum DPS volume. All processes should be running simultaneously.

Partner with the Plant - At the top of the list to boost any Customer Service/District's DPS percentage would be to form a partnership with the servicing Plants. Plant management and craft should be as knowledgeable about DPS percentage goals as Customer Service management and craft. Working with the Plant to insure dedication to running every piece of automation letter mail on the DPS programs, maximizing DPS machine usage, maintaining current DPS programs and maintaining high machine performance levels is critical. Each District should create a dedicated DPS Team incorporating Customer Service and Plant personnel at all levels to get the maximum mileage from all DPS enhancing activities.

Edit Book Review (Red Book) - The first step to increase DPS percentage is a complete review of all City and Rural Edit books. Reasons can be due to a number of factors causing change; such as growth, change in delivery mode, route adjustments, 911 addressing, and others, a carrier by carrier review is required. District Address Management Systems (AMS) should be consulted to assist with this. Carriers may have been focusing on validating addresses alone while accurate information on mode of delivery is also critical. Therefore, in addition to confirming line of travel, address, street name/directional/suffix, secondary address, and 1621 code; carrier knowledge of multiple delivery point addresses and the corresponding letter mail volume should be annotated. This insight can aid in deciding which multiple delivery points need to be physically audited under the "Station Input Review".

Counting Manual Letter Mail - Often over looked, accurate counting of manual letter volume will generate a true picture of DPS percentage. It is ultimately the responsibility of the supervisor to insure manual letter volume is correctly input into DOIS. Manual letter mail must be compressed evenly and measured with a ruler always. Care must be taken not to duplicate the counting of automation holdouts and to insure all NLM is handled correctly. Districts should re-distribute instructions for counting mail at least once a year as a refresher course. Volume Recording for F4 is outlined in Management Instruction, PO-610-2002-3 and F2B is outlined in Management Instruction, PO-610-2000-1.

Station Input Editor (SIE) Review - Whether the site is a CSBCS site or a Delivery Bar Code Sorter (DBCS) site will determine the access and control of Station Input Holdouts. In either situation, it is important to remember only Multiple Delivery Point (MDP) Holdouts are excluded from DPS volume in City delivery. All holdouts are excluded from Rural DPS volume. All holdouts (Change of Address (COA), Temporary Non-Delivery (TND), Non-Delivery Day (NDD), Window Call (WC), and Multiple Delivery Point should be reviewed. In addition to validating holdouts impacting DPS percentage for City delivery, take advantage of increasing carrier efficiency for both City and Rural Delivery. When Station Input is maintained consistently by the guidelines, there is no adverse impact during National Rural count.

Special attention should be given to MDP holdouts. Based on review of the MDP holdout report and carrier input, a physical street audit may be needed. All MDP holdouts for street and high rise defaults should be eliminated where feasible. The deciding test is whether a carrier can affect delivery of non-sequenced secondary addressed mail (i.e. mail coded with the street or high rise default versus the high rise exact) on the street in a reasonably efficient manner. Other holdouts should be reviewed for compliance to guidelines as follows:

- COA – tagged for no longer than 30 days
- TND – tagged for time indicated on the order
- NDD – tagged for business closed day only
- WC – tagged for actual Caller Service customer only

Reject Mail and Unassigned Bin Review - All DPS leakage should be reviewed regardless of source. Reviewing Reject and Unassigned bin trays can be tedious and time consuming, but promotes increased DPS, as well as, customer satisfaction. The good news is dedication and follow through brings results and expedites future work in this area. The first step is to perform a lookup to insure the address on the mail piece is a valid address and in the sort programs. After validation of the mail piece address and analysis of the barcode, mail pieces should be copied and forwarded to the appropriate person for resolution. Other functional areas such as In Plant Support, AMS, Mail Piece Design Analysts, Business Mail Entry, DPS Coordinators and any dedicated DPS Teams are the support behind the local office initiative to identify this leakage. There may be no resolution to some individual mail pieces. It's difficult to impact poor addressing by an individual customer. Mail pieces put in the system by businesses and major mailers will account for most of the successes. Also, it probably will not be possible to review every piece of mail in every reject and unassigned bin tray. However, it is important to dedicate resources to this process daily. Each successful resolution increases the knowledge of the person doing the audit, expedites the next review and increases DPS. The following is a link to an excellent Address Look-up Tool:

Reference:

http//:zip4.usps.com/zip4/welcome.jsp

Electronic Mail Improvement Reporting (eMIR) - When irregularities are found in mailings past the point of acceptance, they should be reported through the eMIR system. Some of these irregularities may be causing DPS leakage. In any event, all irregularities should be reported through the online system. Local mailings can be resolved locally, but should still be input into the eMIR system to provide resolution tracking. National and Premier accounts are handled at the Headquarters level through the Business Service Network once they are input in eMIR.

Backflow of DPS Candidate Mail - It is important to have a consistent backflow of DPS candidate mail to the serving Processing and Distribution Center (P&DC), whether the unit DPS is processed on a DBCS or CSBCS. All incoming dispatch should be surveyed by a Supervisor for disposition. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS, while meeting our service commitments. Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

Carrier Mode of Delivery - It's important to maintain accurate delivery mode (1621 code) on City and Rural edit sheets. DPS sort programs are built on the AMS database. When new deliveries are added or old deliveries are updated with new 1621 codes, AMS should receive the information as soon as possible. Obviously, you can't sort mail to a new address that is not in the sort program, but change of delivery mode updates can also impact DPS significantly. For example, what if you have a 9 story high rise building with heavy mail businesses that changes from door to door delivery to some type of cluster box delivery? What used to be held out of DPS, due to being door to door, can now be included in DPS.

Carrier Route Schemes - Correct, complete street name assignments should be current at all times. In DPS, N Main St is not the same as Main St N. Typically, streets with a directional, with unusual spellings, with initials in the name, with name/number range changes, and numbered streets are candidates for incorrect application on mail pieces. AMS allowed alias street names are one way to overcome poor customer addressing. Up to date scheme books should be available in the Delivery Unit at all times.

Missent, Missort, Missequence (MMM) - Generally, Missent pieces are bad barcodes, Missort pieces are machine errors, and Missequenced pieces are a machine problem unless the same mail piece is being missequenced constantly. An AM SOP Office must have a dedicated 3M case for carriers to deposit DPS errors returned from the street. A daily communications process with the plant to share problems found should be part of the IOP process addressed in Chapter 2

of this guide. A supervisor or designated knowledgeable craft employee will review this mail on a daily basis.

Electronic Un-coded Address Reporting System (eUARS) - eUARS are generated when a customer submits a change of address with a new address that cannot be matched to a ZIP+4 in the Address Management System (AMS) database and when un-coded Address Element Corrections are created through Memphis. Postmasters and Customer Service Supervisors must check the eUARS site regularly to edit/correct elements of the submitted address to allow matching to the AMS database. Corrections may be as simple as correcting a directional or may initiate adding a new street to an edit book. Clearing eUARS guarantees automation compatible forwarding addresses and customer address lists. District tracking of eUARS not cleared in a timely manner insures compliance.

Delivery Sortation Management Automation Research Tool (DSmart) - DSmart is a new online Intelligent Mail and Address Quality (IMAQ) tool implemented this fiscal year identifying DPS leakage based on the number of "hits" of individual barcodes on live mail falling out of DPS from DBCS and CSBCS final pass. Each eleven digit barcodes not falling in DPS totals and rolls to the appropriate report. Reports may be pulled by 5-digit Zip Code, desired time frame, and threshold volume and include the carrier route id for ease of use. Types of reports are as follows: 1) *Potential Missing Delivery Points*, *High Rise Analysis*, 2) *Potential Street to High Rise Coding Opportunity, 3) New DPF High Rise Zip +4*, 4) *No/Low Volume*, 5) *Business Names*. Each report is an aid to improving DPS percentage. Some of the reports can be easily resolved and others require research and/or carrier input. Training and reports are available online at:

Reference:

http://dsmart.usps.gov/. Your login for DSmart is your ACE login.

All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

1-2 Backflow of Automation Compatible Mail - It is important to have a consistent backflow of automation compatible mail to the serving Processing and Distribution Center (P&DC), whether the unit's DPS is processed on a DBCS or CSBCS and the unit's flats are processed on AFSM or FSS equipment. All incoming dispatch should be surveyed by a Supervisor for identification and separation of automation compatible mail before it is sorted in manual distribution or reaches carrier cases. Taking the class of mail and/or color coding into consideration the routing decision should be based on getting all letter mail pieces in DPS and all 5-digit automation compatible flats carrier-routed on the AFSM or in FSS, while meeting our service commitments. The placard used to return the mail to the plant should indicate the color code that was on the mail when it arrived in the delivery unit.

Two separate runs of DPS on Holiday weekends at offices and/or Plants should be eliminated.

1-3 Mail History Tracking Reporting System - This report is to be run by the supervisor/manager every day no later than 30 minutes after first available and the errors are to be shared with the appropriate carriers. Carriers then must pull the DPS errors out of their DPS trays and either case the mail or return the mail to the hot case for distribution to the correct route.

The report can be pulled by typing "MHTS" on the blue page or at the following website link: http://mhts/mhts/index.html. If you have problems with the website or report call (703) 207-7297 or send an e-mail to: mhtshelp@nortelgov.com

2 INTEGRATED OPERATING PLAN (IOP)

2-1 S999 Mail - All DPS programs should finalize for timely receipt at the delivery unit, including S999 and reject volumes to be worked manually, to ensure carriers are not waiting for mail. See 2-5 of the Implementation Guide.

2-2 IOP - The IOP is a contract between the mail processing plant(s) and the delivery unit. A signed copy must be on file in the Delivery Unit. The contract covers the mail arrival from the plant and identifies the product of mail agreed upon for each individual trip. The primary purpose of having an IOP is to stabilize mail flows. Each District must have an IOP Coordinator who serves as a valuable resource in setting up mail arrival contracts between the delivery unit and the plant. The mail product agreed upon for each dispatch from the plant to the delivery unit must be conducive to the unit's mail flow needs. The current dispatch schedule must be posted in a prominent place on the receiving dock. IOP is an integral part of the F4 Business Plan, On-Site F4 Reviews, AM SOP, and 24 hour clock goals. The mail arrival profile is critical in establishing appropriate staffing and reporting times.

2-3 DOIS Recording of Arrival Times and volumes - The IOP contract must be current and must be adhered to by all parties. DOIS version 4.3 or higher provides the necessary capability to track and monitor compliance with the IOP. The portion of the IOP contract showing truck schedules and the product of mail that should be on each truck must be posted. The IOP contract information showing truck arrival times and percent of AM Total Mail on each trip must be entered into the DOIS "Maintain Dispatch Information" screen. The trip that has DPS, Automated Carrier Route Flats, and Automated Carrier Route Letters must also be noted in this screen. The unit must track the amount of volume received by trip and record the actual time of arrival.

Trip information for delivery unit operations must be entered in the DOIS "Capture Daily Dispatch" Screen. For each trip enter:

- The actual arrival time of the trip
- Confirm arrival of DPS
- Confirm arrival of Automated Carrier Route Letters
- Confirm arrival of Automated Carrier Route Flats
- Volume of working letters, flats, and parcels
- Volume of automated volume received.

Trip information for all carrier routed mail received from the plant that bypasses F4 processing must be entered into DOIS by trip including the arrival time. This can be entered on the DOIS "Capture Mail Volumes – Manual" screen or on the "Capture Mail Volumes – DCD" screen. The volume taken to carrier routes that is withdrawn should be entered as "Withdraw" in DOIS. DPS and Automated Letter and Flat volumes will automatically be attributed to the trip assigned in the "Maintain Dispatch Information" screen.

2-4 Communication Channel - If variances between the IOP and the actual performance exist, the responsible management partners must provide the necessary feedback and take the necessary actions to address these variances with the partners. The DOIS "Unit Distribution Volume Feedback Report" identifies late trips, and variances from the IOP in the amount of working / automated mail received on each trip. Use this report as the basis for following up with the plant to address these variances. The DOIS "Unit Volume Feedback Report" identifies routes that do not receive 80% of caseable mail by the carrier's start time.

2-5 Mail Arrival - The IOP must be based on the valid requirements for mail arrival at each delivery unit. Some valid requirements include:

- Transportation from the plant to the delivery unit on time 95% or better
- Containers properly labeled and placarded
- Separation of First and Standard (A) flats to the maximum extent possible

- Mail mix (Unit Distribution %) on the Pre-DOV/DOV as negotiated by the Lead MDO and the Postmaster/Station Manager
- Mail flow i.e. arrival time of DPS, arrival of auto letters and arrival of auto flats
- DPS Rejects on top of the appropriate container
- Deviations from the contract will be preceded by a phone call from the Plant

2-6 DPS Processing - Mail Processing must stage DPS letters for transport in shelved or modified APCs so that individual trays do not have to be re-handled at the delivery unit.

2-7 Automated Flat Separations - The IOP must include a commitment by mail processing to make a minimum of 4 distinct rolling stock container separations for automation carrier route flats. Automation flats are spread by Function 4 to the carrier cases and either ledge loaded or placed in carrier Fibredomes prior to the carrier reporting times. In order to minimize re-handling of carrier route flat tubs by Function 4 and to allow the clerk(s) to complete the spreading in a timely manner, the Function 1 Mail Processing Flat staging and dispatch operations must be optimized to efficiently support this Function 4 task.

The following steps are recommended in order to implement this process:

- A designee from In-Plant Support (typically an Industrial Engineer) works with local management of the AM SOP Office to identify the optimum separations for each container of flat trays based on the physical layout of the carrier cases and the existing automation sort plan.
- In-Plant Support revises the automation sort plan for implementation of the desired separations in a manner that simplifies instructions for the machine operators. For example, to make 4 separations for a unit that has both city and rural delivery and the carrier cases are physically aligned in numerical sequence, consider placing the low numbered city routes and low numbered rural routes on one side of the machine and the high numbered routes on the opposite side. Two containers would be placed at the end of each side of the machine, one for city and one for rural. PO Box sections and Firm Callers could be placed on opposite sides to provide two additional separations where warranted.
- In-Plant Support develops an SOP (sample attached) and proposed container placards and shares it with the AM SOP Office local management for review and concurrence. The AM SOP Office develops an SOP for spreading automation carrier route flats (sample attached) and shares it with In-Plant Support for review and concurrence. The AM SOP Office, SOP for spreading automation carrier route flats should include procedures for spreading and stacking CR Presort bundles at the unit, also.
- In-Plant Support should train the machine operators and appropriate SDO(s) and MDO(s) on the revised dispatch process and implement the revised sort plan and dispatch procedures. The AM SOP Office should train the Function 4 clerks and implement the revised automation carrier route flat spreading SOP.
- Revise the IOP to include the agreed upon separations and dispatch particulars for automation carrier route flats.
- Because of business or other operational issues, this question could be answered N/A.

3 CLERK OPERATIONS - FUNCTION 4

3.1 AM Accountable - This operation has a significant direct impact on the carrier operation through the sorting and assigning accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. Accountable items must be available for the carriers in a timely manner so as not to delay the carrier's departure to the street. As little carrier time as possible should be used in this operation, so it is highly recommended that a mobile accountable cart operation be used. The accountable

cart must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details

3-2 PM Accountable - This operation has a significant direct impact on the carrier operation through the clearing of accountables (i.e. Registered Mail, Certified Mail, Collect on Delivery (COD), Customs Duty mail, postage due, etc.) for the total office. Depending upon the office, other items may be included in this operation such as scanners, and Arrow Lock keys. When the carriers return from the street, an efficient clearance process that allows for clearance as soon as the carrier returns to the office with minimal or no waiting time is desired. The accountable cage must comply with Inspection Service guidelines to provide proper security for the mails involved. Refer to M-39 116.1 and 117.1h for more details.

3-3 Distribution Cut Off Times and Distribution Expectations - Mail up times should be established and posted in each manual operation, including PO Box mail and CSBCS operations, reflecting finalization of mail in the order of flats, letters and then parcels/SPRs. Up times must effectively support the earliest carrier leave time and be supported by the IOP. Supervisors should make accurate assessment of all workloads and appropriate assignments. At the final incoming dispatch, Supervisors should re-evaluate assignments to insure finalizations of all mail types to meet Delivery needs. Actual work hour variance should be calculated daily and used to evaluate operations and make management decisions.

An efficient LDC 43 operation is critical for an AM SOP Office. All mail types (letters, flats, parcels/SPRs) must be sorted at a rate equal to or greater than the distribution expectations published in Automation Workforce Planning System (AWPS) and as re-stated in the Function Four Business Plan. All unit up times and distribution expectations must be communicated with all F4 personnel.

Distribution Expectations

Letter Mail Distribution

Separations	Foot Per Hour	Pieces
00-20	9.5	2157
21-35	9	2043
36-49	8.5	1930
50-63	7.75	1759
64-77	7	1589
78-84	6.26	1419
85-999	5.5	1249

Flat Mail Distribution

Separations	Foot Per Hour	Pieces
0-20	11.75	1,351
21-35	11.25	1,294
36-49	10.5	1,208
50-63	9.5	1,093
64-77	8.75	1,006
78-84	7.75	892
85-999	6.75	776

National Container Conversion Rate for Containers

	Full	3/4	½	¼
#1 Sack	8.79	6.6	4.4	2.2
U-cart	12.31	9.23	6.2	3.1
Gurney (1033)	15.27	11.4	7.6	3.8
Hamper (1046)	39.7	29.8	20.0	10.0
GPMC/APC/ERMC	102	76.5	51.0	25.5
Over the Road (OTR)/BMC	261	195.8	130.5	65.2
Wire Container	118	88.5	59.0	29.5
Extended hamper	65	48.75	32.5	16.2
WestPak/Gaylord	261	195.8	130.5	65.2
Outside Pieces	Actual count			
Destination Delivery Unit (DDU)	Actual count from PS Form 8125, Plant-Verified Drop Shipment (PVDS) Verification and Clearance			

NOTE: Parcel container conversions currently include SPRs. Do not initiate a second handling to achieve a separate piece count for SPRs. This applies to Function 4 parcel post volume recording, not Function 2.

3-4 Empty Equipment - The workroom floor must be clear from excess, empty equipment. As clerks spread mail, empty equipment must be removed and placed in containers for return to the plant in a timely manner. All labels must be removed from mail transport equipment, whether, trays, tubs or rolling stock when the equipment is emptied.

The disposal of empty equipment returned from the street is the responsibility of the carrier. Many carriers reuse equipment daily such as hard plastic trays. These are typically retained overnight at the carrier case. Excess letter carrier equipment to be returned usually consists of DPS letter trays. Empty equipment containers must be pre-positioned in the carrier's line of travel for the carrier to deposit excess letter trays and other commonly used equipment upon their return from the street.

References:

POM Section 58 – "Mail Transport Equipment Handling Policy";
Website link: http://blue.usps.gov/delret/L4CustServSupp_Function4.htm.

3-5 National Color Code Policy - Supervisors must train all F4 personnel on the procedures of the National Color Coding Policy and ensure compliance for working manual F4 volume and spreading F2 volume. Obtain a copy of the National Color Code Policy at the following website: http://blue.usps.gov/opsplanning/colorcodeqa.htm and refer to Postal Operations Manual 458.34 at the following website: http://blue.usps.gov/cpim/ftp/manuals/pom/html/c4_029.htm.

3-6 SOP *Sample Mail Spreading SOP for Function 4*

MAIL SPREADING STANDARD OPERATING PLAN

The spreading of mail by clerical personnel is a critical item that must be performed efficiently, correctly, and in a timely manner in order for the delivery operation to meet their objectives.

In order for Function Four clerks to achieve this goal, the following steps will be taken each day in spreading the mail to carrier cases:

- ALL mail will be separated at the case based on the color code:

- ALL mail with the current day's color code shall be placed on the floor on the right side of the case (exception is ledge loaded flats).
- ALL mail with any future day's color code shall be placed on the floor on the left side of the case. (In some situations future day's color code mail can be curtailed in the breakdown staging area until PM operations when sorted and spread to carriers' cases).
- All mail will be placed neatly as close as possible next to the case legs.
- When an identified Walk Sequence Mailing is determined by management to require casing, the Walk Sequence Mailing will be stacked separately from other caseable mail when placed at the case and properly color coded.
- Walk Sequence Mailings taken directly to the street are placed in parcel hampers.

Ledge Loaded Flats

- All flats in flat tubs labeled First Class or periodicals are to be placed on the ledge, face up at the front edge of the ledge
- All piles should not unduly restrict the ability of the carrier to case mail in the bottom row of the case. (no more than about 5 inches high)
- Any flats that are unable to be placed on the ledge without restricting the bottom row are to be placed in the flat container attached to the carrier case (Fibredomes).
- Overflow due to a full ledge, full Fibredome, or in the absence of a fibredome, is to be placed at the right leg of the carrier case.
- ALL labels are to be removed from empty equipment.

Standard Flats

Flat tubs containing Standard mail are to be placed in the flat container attached to the carriers' case (Fibredome) or on the floor if no fibredome. AFSM Standard mail is assumed to be for today's delivery. All labels are to be removed, and the empty equipment is to be consolidated for dispatch and reuse.

Manual Flats

All manual flats are to be placed in the flat container attached to the carrier case (Fibredome) or on the floor if no fibredome after the flats have been measured by the supervisor/manager.

Carrier Routed Pre-Sort Flat Bundles

Pre-Sort bundles shall be placed according to color code policy and mail identified for current delivery day as directed by supervisors.
All Pref. flats (periodicals, 1st class etc.) are always treated as the current day's mail.
All presort bundles shall be stacked according to color code by the case legs in 2 foot stacks. The measuring tape on the case leg will serve as the 2 foot marker.

3-7 Function Four Volume Recording - Daily volume and productivity reporting must be established and displayed. Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009, accessible at the following website:
http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

F4 Volume Recording

- Accurate volume recording is essential.
- The designated employee must measure with a ruler, tape measure or yardstick.
- Compress mail in a consistent manner.
- Record linearly and round to nearest quarter foot.
- Volumes are entered onto the preferred form (PS Form 3930).
- Conversions to pieces must utilize current pieces per foot conversion rate.

F4 Volume Not Recorded

- Carrier-routed volumes generated from automation operations.
- Direct bundles and trays/tubs
- Mail being riffled to check for errors
- Accountable items

Presort Letters And S999 Mail

- When possible presort letters should be back flowed to the DPS operation.
- Spread non-machineable presort and S999 mail directly to the carrier case
- Do not record volumes for S999 mail.

Measurement and recording of all manual volumes must follow the guidelines in MI PO 610-2009-1. Function 4 Standardized Customer Service Workload Reporting System dated July 9, 2009. The Management Instruction (MI), PO-610-2009-1, Function 4 Standardized Customer Service Workload Reporting System contains the national policies and procedures for recording and reporting Function Four workload. To obtain a copy of the Management Instruction go to the following website:

http://blue.usps.gov/cpim/ftp/manage/p6102009.pdf

3-8 - Reserved

3-9 - Reserved

3-10 Staging and Spreading Mail - Setup, staging and spreading of all mail types must be accomplished so that mail is presented to the carriers in a timely manner to insure delivery is able to maximize efficiency in office and street duties. All manual letters and flats must be spread by F4 personnel, reducing or minimizing carrier withdrawal time

Pulldown is the withdrawal of mail from distribution cases in preparation for spreading the mail to carrier cases. Efficient pulling ensures improving the flow of mail and enhancing distribution. Carrier withdrawal of letter and flat mail should be eliminated wherever local conditions permit. The work hours used to pull, withdraw and spread mail is greatly minimized through the use of rolling stock. Therefore, rolling stock should be considered in every office where space permits.

3-11 Flat Mail placement at Carrier case - Flats are to be either ledge loaded or placed in Fiberdome. Significant improvements in city and rural carrier performance as measured by percent to standard can be expected where clerks either ledge load or place in Fiberdomes carrier routed automated flats or presort flats in lieu of the more traditional method of simply stacking automated flat containers at the carrier cases and allowing each carrier to unload the flats and handle the empty flat trays. Refer to 3-10 of the AM SOP Implementation Guide.

Manual flats are to be measured by the supervisor prior to the clerk spreading the flats to the carrier's case.

NLM must be stacked in such a way to facilitate accurate measurement by the supervisor while ensuring the separation of NLM and linear measured mail. All mail must be arranged to allow ease of identity of current days' mail while maintaining correct color coding. Refer to 3-4, 3-5, and 3-10 of the AM SOP Implementation Guide.

3-12 Mail On Time To Carriers - The timely arrival and subsequent spreading of flats at the carriers' case is crucial to the success of an AM SOP Office. A key target is to have 80% of all caseable mail available at the carrier cases and all associated empty equipment including any flat tubs or letter trays removed from carrier casing areas prior to scheduled carrier reporting times.

Refer to Section 2 IOP of the AM SOP Implementation Guide for resolving mail arrival concerns. Refer to 3-3 of the AM SOP Implementation Guide for distribution expectations and posted cut off times within customer service operations.

Carrier start times must coincide with 80% of caseable mail being available at the carriers' cases.

3-13 Full Coverage Mailings (Walk Sequence) - Walk sequenced mailings should be isolated by Function 4 employees and placed in Parcel hampers so mailings can be taken directly to the street without further handlings. Mail should not be bundled prior to leave time, unless it is stated in the local agreement. An exception to this process is non-motorized routes which must be bundled out prior to relay delivery cut-off.

Walk sequence volume is defined as letters or flats in sequential order delivery in accordance with the Red Book and the case labels. Sequence volume is not necessarily volume for every delivery, it is mail merely in delivery order that typically covers a significant majority of the residential deliveries. Sequence mail on Foot and Park & Loop delivery must not be cased unless more than one set of requested in-home dates. If more than one set is received, curtailment of any additional sets is the preferred option. However, if more than one set of sequence volume must be delivered that day, the carrier on Foot and Park & Loop delivery may case the additional set(s) of sequence volume to meet the three bundle restriction. Carriers on Curbline and Centralized delivery should be directed to carry the additional sequence bundle(s) directly to the street without casing.

If a set of sequence must be cased so as not to exceed the 3 bundles on Foot and Park & Loop delivery, direct the carrier to case the set with the highest casing productivity.

4 CUSTOMER SERVICE/DELIVERY FLOOR LAYOUT

4-1 Equipment - Case layouts and cell assignments must be reviewed and optimized for efficiency and standardization. Secondary cases for PO Box sections and Window Callers should be eliminated except in extremely unusual circumstances.

A primary letter case 49 cell open back is preferred (and wing if needed) To determine the appropriate number of letter set ups the following formula is to be used: Using a 12-month SPLY analysis of letters to obtain a daily average. Divide SPLY total actual letter pieces by 302. Divide this figure by the office's AWPS letter expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for letter distribution (open to last call) = Number of letter distribution set ups required (round up to nearest whole number).

Rolling stock should be utilized for primary and secondary flat distribution wherever possible. APCs with shelf inserts utilizing three sided cardboard flat trays or Flat Tote Racks utilizing 775 Flat Trays should be used. To determine the appropriate number of flat set ups the following formula is to be used: Using a 12-month SPLY analysis of flats to obtain a daily average. Divide SPLY total actual flats pieces by 302. Divide this figure by the office's AWPS flat expectation rate based on earned cell separations. Divide this figure by the unit's hours of operation for flat distribution (open to last call) = Number of flat distribution set ups required (round up to nearest whole number).

Each distribution operation will have an area dedicated to breaking down and/or staging carrier routed bundles, mixed mail containers, etc... into their smaller constituent parts in preparation for distribution to carrier cases or other distribution operations. This area should normally be in an area near the loading dock doors.

Distribution of parcel post is made from incoming containers to large hampers (1046). In some isolated instances where volume is very low year round a small hamper (1033) can be substituted. Where space permits the hampers are to be placed in a "U-shaped" configuration

where the incoming container of parcels is pulled into the center of the "U" for distribution. Hampers are normally placed two to three deep and the distance is such that the distributor is able to lightly toss most parcels into the hamper from in front of the parcel container. The goal is to finalize all parcels with a single handling. Also, the carrier parcel hamper area should be located to facilitate an unencumbered pathway to and from each carrier case and the distance minimized to the extent possible.

Small parcels (SPRs) are received in various containers and may arrive in the unit co-mingled with parcels. SPRs can be sorted in several ways as follows:

- Flat Tote Rack - Flat Tote Racks can be used for sorting SPRs. These racks come in various sizes; the most common size is 20 tubs per rack. SPRs are tossed lightly into the flats tub. When sorting is finished, the racks can be rolled to the carriers cases to spread the tubs of SPRs.
- Flat Tubs on floor in front of 1046's – Distribution of SPRs can be accomplished to flat tubs by placing the tubs on the floor in front of the 1046 hamper set-up. This provides the ability to sort mixed parcels and SPRs at the same time eliminating double handling when two set-up's are used. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs are loaded into the 1046's for distribution to carriers.
- Flat Tubs attached to 1046's – An option to the above process of distribution of SPRs to flat tubs identified above is to affix flat tubs to hampers with "S" hooks attached to the top rail of a 1046 hamper or to use special plastic bins available through the Material Distribution Center that have a bracket that affixes to the top rail of a 1046 hamper. SPRs are tossed lightly into the flats tub. When distribution is completed the flat tubs remain in place for distribution to carriers.

4-2 Supervisors Workstation - The supervisor's desk or workstation should be located in an area that allows maximum visual coverage of the workroom floor without impeding operations. Consider location of electric, phone and data port outlets.

4-3 Outgoing Mail Staging Area - Generally this setup should be located near the back dock. Proper set ups with placards for separations as noted in the unit IOP are mandatory. See M-39, 117.1e.

4-4 Throwback Case - Case should be labeled per M-39 Exhibit 126.13 as found at page 28 of:

http://blue.usps.gov/delret/_pdf/m39.pdf

4-5 DPS Staging Area - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles.

4-6 Vertical Flat Memorandum - The preferred shelf configuration is the 5 shelf case. Additional information can be found in the M-39 sec 121:

http://blue.usps.gov/cpim/ftp/hand/m39.pdf

Additional info can also be found in the VFC MOU:

http://blue.usps.gov/delret/L3do/city/AM SOP/VFC.pdf

4-7 Hot Case - The hot case should be painted or labeled in a distinct fashion to facilitate easy identification and located in the carriers' line of travel to their exit.

5 CITY DELIVERY – FUNCTION 2B

5-1 Office Percent to Standard - Percent to Standard is determined by dividing actual office hours by the standard office hours. Standard hours are determined by applying the current office time standards (18 / 8/ 70) plus Fixed Office Time (FOT) to the volume for the period in question. By using less hours than standard (Percent to Standard below 100%), the office will show that they are working at a high efficiency level. The effective use of DOIS as well as matching work hours to workload will enable the office to achieve the expected savings.

5-2 Deliveries Per Hour - Deliveries Per Hour (DPH) is cumulative deliveries divided by total city delivery work hours (LDC 21-24, 26-29, & 92) over a given time period. Cumulative deliveries are possible deliveries totaled over the same given time period. The office must be meeting the current FY percentage improvement over SPLY. This goal is an overall effectiveness measurement for each office. The ability to manage both office and street functions simultaneously with the tools and methods described in the AM SOP Implementation Guide for office and street duties will enable the unit to achieve this goal (See sections 5-3, 5-7, and 5-8).

5-3 Managed Service Points (MSP) - MSP is a tool designed to monitor delivery consistency and enhance street management processes. Using this tool, local managers are able to review carrier street performance on a daily basis as they evaluate the consistency of arrival at pivotal locations along a route's line of travel. It also provides a comparison of expected intervals established by route inspection data verses actual performance as well as loading and travel times to and from the route. Carrier AM office time has been historically decreasing as a result of operational changes such as increased DPS, increased processing of flats on automation, IOP implementation, IOP compliance tracking and, in some cases, across the board volume decreases. With more of the average carrier's day being spent on street delivery and with the advent of delivery sequencing for flats, there is a critical need for effective and consistent use of MSP information in daily delivery operations.

A key tool is the MSP Route Report which computes the time difference between actual and scheduled scan times. The time difference, known as 'gap' time, is the variance between the scheduled scan time and the actual scan time for each scan point on the route. As carrier AM office time decreases, the time of the first scan trends to be earlier. The 'gap' time for the route should be maintained throughout the day unless there is a known and approved cause for a change of that time such as pivoting, vehicle breakdown, authorized deviation, etc. It is critical that Postmasters and Mgr., C/S Operations review the MSP Route Report on a daily basis to identify individual routes that show significant variances in 'gap' times. Once the routes are identified, the Postmaster or Mgr., C/S needs to discuss the routes and the 'gap' time variances with the delivery supervisor for follow-up. Local management should plan their street supervision activities to include street supervision for those routes at the times and locations where the significant 'gap' time variances occurred (+ or -) absent known or approved cause.

Supervisor should ensure accurate AVUS records on a daily basis. Daily review of employee vehicle scans including mileage, vehicle and route numbers to ensure accuracy and completeness of entries. The Vehicle Utilization Daily Report should be printed and reviewed to verify accuracy of the all entries. Supervisor should annotate any mileage deviations (usually 2 or more miles +/-) with the reason for the deviation. This report can also serve as a reference when discussing individual carrier performance. All Reports with annotations should be kept in case of potential corrective actions.

5-4 Carrier SOP - Each office should develop a Carrier SOP based on their particular operation. These guidelines will serve as the basic set of instructions for all carriers to follow through the course of the work day. It is vital that all carriers and supervisors are familiar with these guidelines and fully understand the entire process. Careful thought should be given to the SOP and it should not be just a re-hashing of sections from current manuals and handbooks. The SOP

should direct carriers in the order in which they are to perform tasks during their office and street duties. Examples of items to be included in an SOP are:

What to do immediately upon clocking in
When to perform vehicle inspection
When (if at all) withdraws will be made
How and when carrier will obtain parcels
Loading/ Unloading Procedures
No empty equipment is to be left in vehicles
Collection mail procedures

SOPs must be readily available to all effected employees at all times to serve as a reference and a training tool for new employees. It is suggested that a copy of the current SOP be placed in each carrier's route book and displayed on the workroom floor in a manner to allow for easy reference.

5-5 DPS Mail - DPS mail is not to be distributed to carriers. DPS is to be staged in the carrier line of travel to the exit. Carriers are to place DPS mail in rolling stock for transport to vehicles. NOTE: DPS mail for foot routes is to be tied out and placed in relay sacks.

5-6 Daily Management Team Checklist - A daily management checklist is essential to ensure that all requirements of effective supervision have been both performed and completed timely. Postal supervisors have numerous tasks that must be completed daily and it can be easy to have one or two slip and be forgotten as supervisor's attention is pulled by operational situations. By using a checklist, it can remind the supervisor about their assigned duties as well as provide the PM/Manager a reference to review to make sure nothing has been missed. The checklist should be used by multiple supervisors over the course of the day as supervisor's shifts overlap the carrier's day.

A sample checklist is available at the AM SOP web page:
http://blue.usps.gov/delret/_zip/sup_pm_mgr.zip

5-7 Management Instruction - Just like carriers, unit management will need a set of guidelines to ensure that all required functions are completed timely. This Management SOP and the Daily Management Checklist should compliment one another.
Task assignments should be shared among all management team members.
The management SOP and Checklist will vary in the detail provided in each document. The checklist should be a short phrase to explain the task to be completed; the SOP should provide some detail explain the task to be completed.
Daily management tasks that should be included as part of the SOP include:

Prior to Carrier Report Time

Record any unscheduled absences for the day, make schedule adjustments as necessary

Logging into TACS, reviewing and correct any employee clock ring errors, entering missing leave, review of un-authorized Overtime, penalty overtime or guarantee time or unauthorized tour deviations; and printing of appropriate reports. Entries should be made to 1017A or 1017B as appropriate and placed aside ready to discuss with employees after they report to work.

Log into DOIS and review time records for missing time and correction of DOIS clock ring errors. A DOIS clock ring error can be different from a TACS clock ring error. It may be necessary to re-enter TACS to make corrections to TACS rings once DOIS is reviewed.

Once all TACS and DOIS rings have been reviewed and corrected, the following reports should be printed, reviewed and annotated as necessary:

1813- Late Leaving/Returning Report

Route/Carrier Daily Performance Report
Unit Daily Performance Report
Unit Daily Feedback Report
Review of previous days 3996s and 1571s for accuracy and compliance with instructions

Accurate measurement of daily volume (MI-PO-610-2007-1), proper color coding and timely entry into DOIS. Weblink site is http://blue.usps.gov/cpim/ltp/manage/p6102007.pdf Workload Status Report should be printed each time new volume is entered either via DCD or manual entry.

Log into MyPO and pull hold orders, re-deliveries and service issues as necessary.

If available, pull MHTS Reports and take appropriate action as necessary.

After Carrier's Report to Work

Ensure that time card badges are secure, then available for the proper time frame (5 minutes prior to and 5 minutes after scheduled begin tour).

Discuss with each carrier their individual prior day's performance using previously printed reports, 3996 etc., and discuss expectations for today based on workload, MyPO issues, etc..
You should document waiting time as appropriate using local spreadsheet or by instructing employees to make proper clock ring in TACS, and follow up to ensure compliance.

Discuss previous day performance with PM/manager using previously printed reports and discuss expectation for current day based on workload including street supervision.

Finalize expectations with carriers upon completion of distribution.

Initial CSDRS report.

Observe pull down and vehicle loading.

While Carriers are on Street

Street Supervision based on MSP report discrepancies from previous day, scheduled 3999s, area or district street supervision requirements, etc.

Read/respond to message activity.

Update CSDRS as necessary.

During PM Office Time

Monitor unloading / collection procedures.
Initial of review TACS rings including proper end of tour rings, unauthorized OT etc.
Monitor Accountable clearance and cage procedures.
Handle any unexpected situation and update workload assignment changes.
Measure, record and monitor PM casing.

These are examples and by no means an exclusive list. Your operation may require additional items and additional sections to be included in your SOP.

5-8 Daily Street Management and MSP Review - Street management is to be conducted daily by all delivery supervisors in the office. Management focus is based upon safety, issues highlighted by MSP reports, customer driven concerns, and time used in excess of authorized

street time. Each office should have a street management book containing tools appropriate for the use of the supervisor.

Tools for the city supervisor include a complete current 3999 for each route, blank PS Form 4584 – Drivers Observation, PS Form 1564-a, AVUS Vehicle assignment report, route maps, unit pivot plan, a Data Collection Device (DCD) loaded with the Route Inspection Program and a 3999-X to be used in compiling an annual updated 3999 for each route.

Tools for the rural supervisor include 4003s for each route, route maps, unit pivot plan, AVUS vehicle assignment report, blank PS Form 4584s and blank paper for taking notes on new streets, houses, etc. The supervisor should be alert for road construction causing potential detours, potential safety issues, vacant houses and carrier performance. Some guidelines supervisors should keep in mind while observing carriers on the street include:

- Perform street management daily
- Take Arrow Lock Key on street if needed!
- Monitor growth areas for change
- Always keep carrier route safety in mind.
- Complete 4584's as the opportunity arises for quality observations
- Review 4003's on street for correctness, safety, growth
- Observe street delivery performance. Are they fingering mail? Are they dismounting for delivery of parcels/accountables? Time deliveries per minute and notate

While the supervisor is on street management, they should observe and document the actions of the carriers on the street. If driving practices were observed, PS Form 4584 should be completed. After conducting driving and street observations, the supervisor must provide timely feedback to the carrier on any safety or productivity issues that they may have observed.

References:

AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide
Delivery & Retail Headquarters website at http://blue.usps.gov/delivery/city/am_sop.htm
M-39, Management of Delivery Services, Section 134

5-9 Pivot Plans - Pivot Plans are vital tools for use when it is necessary for routes to be carried by multiple carriers in order to meet delivery requirements and objectives. The reason for pivoting the route may be to capture under time or to ensure delivery when your operation is short staffed. Specific information on how to develop pivot plans is available through the DOIS Documentation at:

http://blue.usps.gov/delret/L3do/dsystems/DOIS/aids/pivot%20plan%20maint.doc/

5-10 Route Book - Specific information on Carrier Route book requirements can be reviewed in M-39 126.5b and M-41 section 25 (including exhibits) at
http://blue.usps.gov/cpim/ftp/hand/m39.pdf

6 DELIVERY OPERATIONS

6.1 Missent, Missort, Missequenced - Missent pieces, (wrong office), are incorrect barcodes, Missort pieces, (right office wrong route), and Missequenced pieces, (right route wrong order), are likely machine errors. The 3M case should be located in the line of travel for carriers returning from the street. The 3M case has three cells dedicated to each route, Missent, Missorted, and Missequenced. The supervisor reviews the mail daily. The supervisor reports

reoccurring errors, the same errors three times within a week, in CDRS or local policy. Corrective action should be taken by the Plant or CSBCS or DBCS office.

6-2 Hold Mail - Vacation Hold mail is to be retained at the carrier case. This hold mail should be stored in marked trays under the carrier's case. A uniform vacation hold mail policy, consistent with POM requirements is developed by the Postmaster/Station Manager and communicated to all employees both delivery and clerical, and enforced evenly with all customers. The customer must supply the request in writing, preferably through the web form or through PS Form 8076 "Authorization to Hold Mail".

For long term holds and "Snowbirds", Premium Forwarding Service should be encouraged. Premium Forwarding Service customers should be treated as holds and held at the carrier case. Every Wednesday, a designated employee other than the carrier should package this mail. The package is then sent to the customer via Priority Mail.

Reference: http://blue.usps.gov/cpim/ftp/manuals/pom/pomtc.pdf
Hold mail procedures are discussed in the Postal Operations Manual, POM 611.9.

6-3 Carrier Case Labels - Case labels should be neat and orderly. Nothing is hand written on the labels. Confirm the case labels with the Edit Book. Pull the current 3999 and 1564A from DOIS (Supervisor Work Bench) for the routes to be observed. Verify the line of travel is identical to the 3999. Substantiate the park points and relays have been minimized (1564A).

Each relay is identified by a number on the label of the letter separations. The number is placed under a diagonal line directly under the first street number of the relay to be served.

Route patterns are set up to provide for as few vehicle moves as possible. The ideal location for parking points is at an intersection of two streets where four relays may be carried without the need for a vehicle move. Many variations are possible depending on mail volume, terrain, curb line boxes, traffic, safety, average lot frontage, and eliminating deadheading.

http://blue.usps.gov/cpim/ftp/hand/m41.pdf (Section 323.21 & 221.5)

6-4 Hot Case SOP and Case Cards - Monitor the distribution and missort mail to delivery personnel to ensure that all current days' mail is delivered the same day. The office must have a Hot Case with the Hot Case Card System. Missort mail is to be directed to the Hot Case or throwback case by function four after the Missort mails is collected from the carrier cases. A Hot Case cut-off and clearance time must be established for the office and prominently posted. Cut-off times must be coordinated with current carrier scheduled leaving times. Carriers must comply with Section 291, Handbook M 41: withdraw preferential mail from the Hot case when leaving for their route. The carriers must place a red Hot Case card into the letter and/or flat holdouts for their respective routes.

6-5 Carrier Collection Mail - City carriers should make every attempt to separate out mail in containers as it is collected from customers, whether on the route or on dedicated collection runs. At a minimum, the carrier should separate Express Mail, Priority Mail, small parcels and Target Mail from ordinary collection mail. It has been shown that if the carrier consistently uses the same container system daily it becomes second nature, requiring minimal or no additional time by the carrier/collector.

Rural carriers cannot be required to make more than two separations without additional compensation. For this reason, it is suggested that rural carriers make two hold outs; collection letters and flats, and Priority Mail. These separations take advantage of the capabilities of the automated facer canceller systems in place in most plants, while expediting the isolation and transportation of Priority Mail to the appropriate location. Under the rural compensation system,

rural carriers are already compensated for handling Express Mail and parcels over two pounds separately.

The Integrated Operating Plan (IOP) should specify the mail preparation requirements of each office and the percentage of collection mail required to be at the plant prior to 1800 for cancellation. Collection mail must be dispatched to the plant prepared in the manner required by the plant with as much volume as possible on each dispatch. A consistent mail dispatch set up with the required labeled separations must be utilized in every Customer Service unit. All preferential mail should be dispatched on available transportation and not held. The amount of rolling stock dispatched should be minimized based on volume collected. Consolidations may be made, where possible and reasonable, such as consolidating containerized Priority flats and Priority parcels.

Reference:

http://blue.usps.gov/cpim/ftp/hand/po209.pdf

6-6 1700 Goal - A carrier's return time is based upon a combination of their leaving time, the route's street time and any additional street duties assigned to the carrier for that day. The DOIS Work Load Status Report will show the carrier estimated return time based on these factors. The goal is that all carriers return by 1700, based on the estimated time from DOIS. Management needs to match these return times with current transportation for collection mail and make their assignments accordingly to ensure that all carriers are expected back prior to the final dispatch in order to allow processing to meet their cancellations and operational goals. Managing carrier return time starts with office performance in the morning, making sure carriers are leaving when expected based on actual workload; and includes, effective daily street management focused on identified issues from MSP reports, customer identified issues, and previous carrier performance.

References:

For further information, refer to the AM SOP 2005 Certification Audit – c2005 v1.02 Auditor's Guide, available from the Delivery & Retail Headquarters website at:
http://blue.usps.gov/delivery/city/am_sop.htm
Management Instruction (MI) PO -610-2007-1 dated July 9, 2007.

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) U229

I. Employee's Action

Area (Specify Work Location): Belle Meade Station Rt 317

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action:

I've been a mail carrier for 21 years and always work my route out of buckets. Now that the flats are lying on the floor it's hard on my back and my knees. I recommend that they put the flats back in the buckets.

Employee	Signature: Barry Turner	Date and Tour: 8-26-14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

The process of staging loaded flats already on the floor at the corners of the case is part of the Station Area Evaluation. The ledges will be loaded with 4-tier stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 3½ high. When the ledge is empty carriers will replenish the ledge with stacks from the floor. Remove all plastic sheets used at that time. Refresher training will be given to all employees as proper lifting.

Supervisor	Signature: [illegible]	Date: 8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Housekeeping & safety is everyone's responsibility. Work areas must be kept neat & free of clutter. Aisles & exits must be maintained at all times.

Approving Official	Signature: [illegible]	Date: [illegible]	Date Employee Notified: [illegible]

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

PS Form 1767, Dec. 1982 WHITE—Local Safety Office (After Abatement) PINK—Local Safety Office (Initial Notice) YELLOW

U224

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location)

Bella Vista Post Office 37005

Describe Hazard, Unsafe Condition or Practice. Recommended Corrective Action.

Recently of elevation change of 1' drop while pulling to the wall

1) Causes extra strain on back, arms, shoulders by repetitive movements reaching, stooping, bending, twisting, not smooth

2) Disrupts hold sides, cases, boxes and baskets available to fill mail sacks for carrier at time fill the cases from weather and rain from weather

3) We have use the tube for decade to separate letters, UPS and accumulates for separate separation of two primary classes of mail

4) Should have these available without operation of bending brackets to 3 feet height

Employee	Signature	Date and Tour
	Jerry L. Moore	8-26-2014 Tour

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

The process of staging banded flats already on the floor @ the carriers case is part of the Eastern Area Consolidation. The ledges will be loaded with palletized stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 36" high. When the bulk is empty, carriers will replenish the ledges with stacks from the floor, remove all pallets stacks to prevent fire. Bracket training will be given to all employees on proper lift techniques.

Supervisor	Signature	Date
	[illegible]	6/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

[illegible] is [illegible] representative. [illegible] is [illegible] not a [illegible] of [illegible] [illegible] [illegible] [illegible] [illegible] [illegible]

Approving Official	Signature	Date	Date Employee Notified
	[illegible]	[illegible]	[illegible]

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U 225

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location): BELLE MEADE STATION

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

MANAGEMENTS REMOVAL OF BUCKET-INSERTS HAS PLACED UNNECESSARY STRESS ON LOWER BACK AND KNEES. REPETITIVE MOTION AND STRESS ISSUE.

RESCIND NEW RULE BANNING USE OF INSERTS FOR FLAT MAIL

Employee	Signature	Date and Tour
	[illegible]	8/26/14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

The process of staging banded flats already on the floor @ the conveyor belt case is part of the Eastern Area Consolidation. The ledges will be loaded with 4 to 6 inch stacks of flats. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 30" high. When the ledge is empty, we will replenish the ledge with stacks from the floor removed plastic shrink wrap at that time. Refresher training will be given to all employees on proper lifting techniques.

Supervisor	Signature	Date
	[illegible]	8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

HANDLING A STACK IS WORKER'S RESPONSIBILITY. WORK CARTS MUST BE KEPT CLEAN & FREE OF CLUTTER WHICH COULD MISLEAD WE MANEUVERED AT ALL TIMES

Approving Official	Signature	Date	Date Employee Notified
	[illegible]	[illegible]	[illegible]

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U226

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office) ___ ___ ___ ___ ___

I. Employee's Action

Area (Specify Work Location)
Bulk Mail Center 90 Boxes

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.
Since 4-4-25 Mail stacked on floor not in baskets. I had 7 feet both days so instead of 7 smooth, practical moves to pick up baskets and work mail, I had to make 88, repeat 28 awkward twists, turns, and tugs to get mail to work. I am 52 years old and I have already had cancer. Herniated NECK surgery. I don't need to move 4 x the moves to do the same work? This also caused mental stress at home thinking about next day's work

Employee	Signature	Date and Tour
	Kevin by Instalin	8/26/24

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)
The process of staging loaded Gaylords along the floor @ the corners of the case is part of the Carton Area Foundation. The ledges will be loaded with 4-6 inch stacks. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 36" high. When the ledge is empty, carriers will replenish the ledge with stacks from the floor, remove all of the stack work at that time. Refresher training will be given to all employees on proper labor.

Supervisor	Signature	Date
	[illegible]	8/27/2024

III. Approving Official's Action
(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision Is Based Upon:

Housekeeping & safety is everyone's responsibility. Work areas must be kept neat & free of clutter. Injury causes must be eliminated at all times

Approving Official	Signature	Date	Date Employee Notified
	[illegible]	[illegible]	[illegible]

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U227

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location): Workroom Floor at case

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

We used to have tubs with flat mail inside. The handles on the tubs were about 12inches from ground level so I didn't have to bend down or over very far to pick up the mail. Now they have removed the tubs and started putting mail directly on the floor. I am concerned with having to bend over all the way to the floor that my back or knees may give out.

Employee	Signature	Date and Tour
	[signature]	3-26-14

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

The process of staging banded flats already on the floor @ the corners of the case is part of the Eastern Area Condition. The ledges will be loaded with 4 to 6 in stacks of flats. Volume in excess of this will be neatly stacked on the floor beside the case in stacks no more than 36+ high. When the ledge is empty, carriers will replenish the ledge with stacks of flats and remove all plastic to shrink wrap @ the time. Refresher training will be given to all employees on proper lifting techniques.

Supervisor	Signature	Date
	[signature]	8/27/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision Is Based Upon:

Housekeeping & safety is a continuous reminder. Work areas must be kept free of clutter. Safety guidelines must be maintained at all times.

Approving Official	Signature	Date	Date Employee Notified
	[signature]	8-27-14	8-27-14

IV. Maintenance Action (Complete if Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated

U228

U.S. POSTAL SERVICE

REPORT OF HAZARD, UNSAFE CONDITION OR PRACTICE

Hazard Control Number (Assigned by Safety Office)

I. Employee's Action

Area (Specify Work Location)

Describe Hazard, Unsafe Condition or Practice, Recommended Corrective Action.

Employee	Signature	Date and Tour

II. Supervisor's Action

Recommend or Describe Specific Action Taken to Eliminate the Hazard, Unsafe Condition or Practice. (If Corrective Action Has Been Taken, Indicate the Date of Abatement.)

Supervisor	Signature	Date
		8/21/2014

III. Approving Official's Action

(Check One and Complete)

	The Following Corrective Action was Taken to Eliminate the Hazard, Unsafe Condition or Practice (Indicate Date of Abatement):
	A Work Order Has Been Submitted to the Manager, Plant Maintenance, to Effect the Following Change:
X	There Are No Reasonable Grounds to Determine Such a Hazard Exists. This Decision is Based Upon:

Approving Official	Signature	Date	Date Employee Notified

IV. Maintenance Action (Complete If Necessary)

Maintenance Supervisor	Signature	Date	Date Hazard Abated