

Local Grievance # _____

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

Did management violate Section 214 of the M-39 Handbook via Article 19 of the National Agreement by failing to correct unsatisfactory conditions before the route count and inspection that began on [date] at the [Station/Post Office], and if so, what should the remedy be?

Union Facts and Contentions (Block #17 on PS Form 8190):

Facts:

1. Management conducted a route count and inspection on all routes at the [Station/Post Office] beginning on [date].
2. Section 214 of the M-39 Handbook states, in relevant part:

214 **Review of Operating Procedures**

All operations at the delivery units should be reviewed and any unsatisfactory conditions should be corrected before the count is commenced. The review should include at least:

(Emphasis Added)

3. The case file includes interviews and statements from Letter Carriers showing that the following unsatisfactory conditions were not corrected before the count and inspection that began on [date]:

_____ [list unsatisfactory conditions] _____

_____ [list unsatisfactory conditions] _____

_____ [list unsatisfactory conditions] _____

Contentions:

1. Management violated Section 214 of the M-39 Handbook via Article 19 of the National Agreement by failing to correct unsatisfactory conditions before the route count and inspection that began on **[date]**.
2. Management was aware of the unsatisfactory conditions as early as **[date]** and failed to correct these conditions before the route count and inspection.
3. Management at the **[Station/Post Office]** violated the above referenced contract provisions.

Remedy (Block #19 on PS Form 8190):

1. That management be instructed not to implement route adjustments based on the data collected during the week of inspection at the **[Station/Post Office]**.
2. That management cease and desist from future violations of Section 214 of the M-39 Handbook via Article 19 of the National Agreement.
3. That management correct any unsatisfactory conditions before conducting any future route count and inspections.
4. That each City Letter Carrier in the **[Station/Post Office]** be paid a lump sum of \$100.00 to serve as an incentive for future compliance, and/or any other remedy the Step B team or an arbitrator deems appropriate.



National Association of Letter Carriers

Request for Information

To: _____
Supervisor Customer Services

Date _____

Station/Post Office

Dear _____,

Pursuant to Article 17 and 31 of the National Agreement, I am requesting the following information:

1. Copies of any and all correspondence from management to the local NALC branch regarding the route count and inspection which began on **[date]**.
2. Copies of any and all correspondence, emails and notifications between local management and the route inspection team/route inspectors.
3. A copy of the Letter Carrier work schedule for the week(s) of **[date]**.
4. A copy of the route count and inspection schedule for **[date]** through **[date]** at the **[Station/Post Office]**.

I'm also requesting time to interview the following individuals:

1. All letter carriers whose regular assignments were scheduled for inspection

Your cooperation in this matter will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

Shop Steward
NALC

Request received by: _____

Date: _____



National Association of Letter Carriers

Request for Steward Time

To: _____
Supervisor Customer Services

Date: _____

Station/Post Office

Dear _____,

Pursuant to Article 17 of the National Agreement, I am requesting the following steward time to:

Investigate a Grievance Write & Prepare a Grievance Interview Witnesses

I anticipate needing approximately _____ (hours) of steward time, which needs to be scheduled no later than _____. In the event more steward time is needed, I will inform you as soon as possible.

Individuals the union needs to interview:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Your cooperation in this matter will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

Shop Steward
NALC

Request received by: _____

Date: _____