

## Local Grievance # \_\_\_\_\_

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

Did management violate the Interpretive Step Settlement (Case # Q01N-4Q-C 05022605), dated July 7, 2007 (M-01661) via Article 15 of the National Agreement when management used the Carrier Optimal Routing (COR) program to adjust letter carrier routes at the **[Station/Post Office]** and if so, what should the remedy be?

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

#### Facts:

1. Management adjusted all the routes at the **[Station/Post Office]** using Carrier Optimal Routing (COR) on **[Date]**.
2. A total of **[hours/minutes]** of office and street time was eliminated from the station's Letter Carrier assignments.
3. Management adjusted all routes at the [Station/Post Office] without conforming to Chapter 2 of Handbook M-39, *Management of Delivery Services* requirements.
4. Interpretive Step Settlement (Case # Q01N-4Q-C 05022605), dated July 7, 2007, (M-01661) states in relevant part:

*"The Carrier Optimal Routing (COR) process is a management tool to assist with the adjustment of letter carrier routes pursuant to Chapter 2 of Handbook M-39. No components of the COR program or application of the COR process will be inconsistent with the route inspection, evaluation, or adjustment process found in Chapter 2 of the M39 Handbook."*

#### Contentions:

1. Management violated Interpretive Step Settlement (Case # Q01N-4Q-C 05022605), dated July 7, 2007 (M-01661) via Article 15 by failing to adhere to the route inspection, evaluation, or adjustment procedures in Chapter 2 of Handbook M-39, *Management of Delivery Services* as required by M-01661.

**Remedy (Block 19 of PS Form 8190):**

1. That management immediately reinstate all city carrier routes adjusted to their pre-inspection and adjustment status.
2. Management cease and desist violating the National Pre-arbitration COR Settlement (Q01N-4Q-C 05022605, M-01661).
3. That each Letter Carrier in the **[Station/Post Office]** be paid \$25.00 per calendar day beginning with the incident date of this case and continuing until Management return the routes to their pre-inspection and adjustment status.
4. All payments associated with this case be made as soon as administratively possible, but no later than, 30 days from the date Management returns the routes to their pre-inspection and adjustment status. Proof of payment be provided to **[NALC Official]** upon payment.

**If management proves the routes were adjusted using Chapter 2 M-39 guidelines you may need to adjust to the following:**

**Issue Statement (Block 15 of PS Form 8190):**

Did management violate the National Pre-Arbitration settlement on COR (Q01N-4Q-C 05022605, M-01661) via Article 15 of the National Agreement by failing to use the actual time recorded on PS Form 3999 and/or explain, document, validate changes in street time when adjusting Letter Carrier assignments at the **[Station/Post Office]**, and if so, what should the remedy be?

Did management violate the National Pre-Arbitration Settlement on COR (Q06N-4Q-C 09240093, M-01859) via Article 15 of the National Agreement by failing to give the correct time credit for relays on routes when adjusting Letter Carrier assignments at the **[Station/Post Office]**, and if so, what should the remedy be?

**Union Facts and Contentions (Block 17 of PS Form 8190):**

**Facts:**

1. Management adjusted all the routes at the **[Station/Post Office]** using Carrier Optimal Routing (COR) on **[Date]**.
2. A total of **[Hours:Minutes]** of office and street time was eliminated from the station's Letter Carrier assignments.
3. The PS Form 1840 Reverse did not explain the street time deductions made to the assignments.
4. Validations of travel times were not documented and discussed with carriers as required by the National COR Settlement.
5. National Pre-Arbitration settlement on COR (Q01N-4Q-C 05022605, M-01661). The settlement states in relevant part:

*To facilitate the practical application of this understanding, when transferring territory the back of the PS Form 1840 will indicate, by sector segment, any change in street credit from the actual street time used in sector-segment on PS Form 3999; including all relay, travel, allied time, etc. Any such adjustment to the carrier's actual street time must be documented and explained by appropriate comments on the reverse of PS Form 1840... Travel To, Travel From, and Travel Within times must be*

*validated, documented, and discussed during carrier consultation. The actual time should be taken from the Inspection PS Form 3999, unless a new pattern is created during the route adjustment process. If a new travel pattern has been created, the new times must be validated.*

6. The back of the PS Forms 1840 did not explain the relay time deductions made to the assignments and/or show actual relay time recorded on PS Form 3999 was given.
7. Relay times were not documented and discussed with carriers as required by the National COR Settlement.
8. National Pre-Arbitration settlement on COR (Q06N-4Q-C 09240093, M-01859). This settlement states in relevant part:

*If any existing relays remain unchanged during the proposed adjustment, the actual relay times from PS Form 3999 will be used. This would be accomplished with a miscellaneous street time adjustment on PS 1840 (Reverse)*

*Any other relays created by COR will be reviewed and discussed with the regular carrier assigned to the route during the route adjustment consultation. Where agreement is reached that an adjustment is necessary to the relay time, the amount of time to be added or deducted to the relay time will be recorded in the comments section on PS Form 1840 (Reverse). Where agreement cannot be reached, the carrier's comments will be recorded on PS Form 1840 (Reverse) and considered before the route adjustment is finalized and implemented.*

### **Contentions:**

1. Management violated M-01661 when they failed to document and explain all changes to the carrier's actual street time on the PS Form 1840 Reverse.
2. Management violated M-01661 when they failed to document and explain all changes to street time credit on the PS Forms 1840 Reverse for the routes in the **[Station/Post Office]**.
3. Management violated M-01661 when they failed to use the actual time recorded on PS Form 3999 and/or validate time for the new travel patterns created using COR.
4. Management violated National Pre-Arbitration settlement on COR (Q06N-4Q-C 09240093, M-01859) via Article 15 by failing to document

and explain all changes to the carrier's actual relay time on the 1840 Reverse.

5. Management violated the COR settlement when they failed to document, explain and/or give proper credit for all changes to relay time credit on the PS Forms 1840 Reverse for the routes in the **[Station/Post Office]**.
6. Letter Carriers were harmed by having their routes adjusted without the additional relay time for each route properly credited to their routes.
7. This created conflict between the Letter Carriers and management when estimating workload for routes **[route #s]** every day.

### **Remedy (Block 19 of PS Form 8190):**

1. That management immediately make the corrections to the route adjustments they implemented and all associated paperwork in compliance with the cited portions of the National Pre-arbitration COR Settlement (Q01N-4Q-C 05022605, M-01661).
2. Management cease and desist violating the National Pre-arbitration COR Settlement (Q01N-4Q-C 05022605, M-01661) and/or National Pre-arbitration COR Settlement (Q06N-4Q-C 09240093, M-01859).
3. That each Letter Carrier in the **[Station/Post Office]** be paid \$25.00 per calendar day beginning with the incident date of this case and continuing until Management makes the corrections to the route adjustments they implemented and all associated paperwork in compliance with the cited portions of the National Pre-arbitration COR Settlement (Q01N-4Q-C 05022605, M-01661) and National Pre-arbitration COR Settlement (Q06N-4Q-C 09240093, M-01859), for the harm associated with routes not adjusted properly.
4. All payments associated with this case be made as soon as administratively possible, but no later than, 30 days from the date Management makes the corrections to the route adjustments they implemented. Proof of payment be provided to **[NALC Official]** upon payment.



## National Association of Letter Carriers

### Request for Information

To: \_\_\_\_\_  
(Manager/Station)

Date \_\_\_\_\_

\_\_\_\_\_  
[Station/Post Office]

Manager/Station \_\_\_\_\_,

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

1. **Copies of all PS Forms 1840 Reverse from the route adjustment implemented on [Date] in the [Station/Post Office].**
2. **Copies of all PS Forms 3999 and Audit Trail Reports completed in the [Station/Post Office] used to make adjustment on [Date].**
3. **Copy of the COR Existing Route Summary from the route adjustment implemented in the [Station/Post Office] on [Date].**
4. **Copy of the COR Adjusted Route Summary from the route adjustment implemented in the [Station/Post Office] on [Date].**
5. **Copy of the COR Route Summary Report from route adjustment implemented in the [Station/Post Office] on [Date].**
6. **Copy of the COR territory Transfer Summary from the route adjustment implemented in the [Station/Post Office] on [Date].**

I am also requesting time to interview the following individuals:

1. **[Name]**
2. **[Name]**
3. **[Name]**

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: \_\_\_\_\_