



NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

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May 26, 2010

Mr. William Daigneault
Manager, Contract Administration (NRLCA)
Labor Relations, Room 9126
United States Postal Service
475 L'Enfant Plaza, S. W.
Washington, D. C. 20260

Certified Mail Number: 7010 0290 0000 6237 1220
Return Receipt Requested

Dear Mr. Daigneault:

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

There are two issues in this grievance; the first being what happens to the evaluations of rural routes when a route or routes are moved from one location to another, and the second being what happens to the employees when all rural routes from one post office relocate to another post office that may or may not already have rural routes. The Union has been made aware through the field that the Postal Service refers to this process by at least two different names; those names known to the NRLCA are "Delivery Unit Relocation" and "Delivery Unit Optimization".

In dispute is the Postal Service's position that when a rural route is moved from one office to another, only the route mileage will be adjusted accordingly through a base hour change and a corresponding EMA adjustment will be made. The Postal Service has also taken the position that when all rural routes move from one post office to another post office that may or may not already have rural routes, all carriers' seniorities are merged.

It is the position of the NRLCA that there are many factors that may change when moving all routes from one location to another that must be included in any base hour change and factors requiring compensation outside of the base hour change. Some of these factors include but not limited to; withdrawal allowance, loading time, column 17 time, USPS vehicle time allowance, locked pouch, priority parking, and changing case labels. Furthermore, it is the position of the NRLCA that when all rural routes move from one post office to another post office that may or may not already have rural routes, there are additional administrative factors that also must be considered. Some of the

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additional administrative factors that must be considered include but not limited to; merging seniorities of regular carriers, merging seniorities of relief carriers, auxiliary routes, High-Low option, matrix, relief day work list(s), formula office, and retreat rights. The Postal Service's failure to address these issues prior to moving routes violates the National Agreement, including but not limited to, Articles 5, 7, 8, 9, 10, 12, 15, 19, 20, 30, 34, MOU 2., PO-603, and M-38.

The remedial relief sought by the NRLCA includes, but is not limited to the following: The immediate cease and desist of moving routes from one Post Office to another location. The NRLCA seeks a make-whole remedy, including interest at the Federal Judgment rate for all rural craft bargaining unit employees whose routes were re-located from one Post Office to another location.

The parties have discussed the following 3 cases, J06R-4J-C 10115338, J06R-4J-C 09357209, J06R-4J-C 10069655 that were denied at step 3 in the grievance process and the parties have agreed that these 3 cases will have any resolution to this case applied.

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

Sincerely,

A handwritten signature in black ink that reads "Don Cantriel". The signature is written in a cursive style with a large, sweeping initial "D".

Don Cantriel
President

DC:am

cc: NRLCA National Officers
NRLCA Legal Counsel
File