Issue Statement (Block 15 of PS Form 8190):

Did management violate Article 41, Section 2.B of the National Agreement by failing to properly place Letter Carrier **[Name]** on the career City Letter Carrier craft seniority list 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. Letter Carriers [names] were converted to full-time status on [date] at the [Station/Post Office]. This is documented with PS Forms 50 in the case file.
- Management did not use the correct relative standing of Letter Carriers
 [names] to determine seniority placement on the career City Letter Carrier craft seniority list.
- Letter Carrier [name] had a relative standing date of [date] at the [Station/Post Office]. This is documented with the relative standing list dated [date].
- Letter Carrier [name] had a relative standing date of [date] at the [Station/Post Office]. This is documented with the relative standing list dated [date].
- 5. Article 41, Section 2.B.6 of the National Agreement states:

In cases of appointment on the same day, where there is a tie in seniority, the relative standing on the appointment register will determine the more senior carrier.

Contentions:

 Management violated Article 41, Section 2.B of the National Agreement when they placed Letter Carrier [name] below Letter Carrier [name] on the career City Letter Carrier craft seniority list based on something other than their correct relative standing. Since Letter Carrier [name] had a relative standing date preceding that of Letter Carrier [name], Letter Carrier [name] should be placed before Letter Carrier [name] on the Career City Letter Carrier craft seniority list.

Remedy (Block 19 of PS Form 8190):

- 1. That management cease and desist violating Article 41, Section 2.B of the National Agreement in the future.
- 2. That Letter Carriers **[names]** immediately be placed in the proper order on the career City Letter Carrier craft seniority list at the **[Station/Post Office**].
- 3. That Letter Carrier **[name]** be made whole for any benefit of seniority missed due to the placement error.
- 4. That Letter Carrier(s) **[Name]**, **[Name]**, **and [Name]** each be paid a lump sum of \$100.00 to serve as an incentive for future compliance.
- 5. That all payments associated with this case be paid as soon as administratively possible, but no later than 30 days from the date of settlement.
- 6. That proof of payment be provided to **[NALC Official]** upon payment, and/or any other remedy the Step B team or an arbitrator deems appropriate.



National Association of Letter Carriers Request for Information

To: _______(Manager/Supervisor)

Date _____

(Station/Post Office)

Manager/Supervisor _____,

Pursuant to Articles 17 and 31 of the National Agreement, I am requesting the following information to investigate a grievance concerning a violation of Article 41 of the National Agreement :

- 1. A copy of the current career City Letter Carrier craft seniority list at the [Station/Post Office].
- 2. A copy of Letter Carriers [Names] most recent PS Form 50.
- 3. A copy of the relative standing list at the **[Station/Post Office]** prior to the conversion of Letter Carriers **[Names]** to career status.

I'm 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,

Request received by: _____

Shop Steward NALC

Date: _____



National Association of Letter Carriers Request for Steward Time

То:	
(Manager/Supervisor)	

Date _____

(Station/Post Office)

Manager/Supervisor _____,

Pursuant to Article 17 of the National Agreement, I am requesting the following steward time to investigate a grievance. I anticipate needing approximately ______(hours/minutes) of steward time, which needs to be scheduled no later than in order to ensure the timelines established in Article 15 are met.

In the event more steward time is needed, I will inform you as soon as possible.

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,

Request received by: _____

Shop Steward NALC

Date: _____