

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

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

Did management at the **[Installation/Station]** violate Article 7, Section 3.D of the National Agreement by failing to convert auxiliary route **[Aux route #]** to full-time when a route inspection shows the route has become a full-time assignment, and if so, what should the remedy be?

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

#### Facts:

1. A count and inspection of auxiliary route **[Route #]** was conducted from **[Date through Date]**.
2. As a result of the count and inspection, auxiliary route **[Route #]** was evaluated at **[Total time from 1840 Reverse]**. This fact is documented by the PS Form 1840 Reverse in the case file.
3. Article 7, Section 3.D of the National Agreement states:

*D. Where a count and inspection of an auxiliary city delivery assignment indicates that conversion to a full-time position is in order, conversion will be made.*

4. Article 7 of the JCAM explains:

***Auxiliary Route Growth to Full-Time.*** *To accommodate growing routes, Article 7.3.D provides for the conversion of an auxiliary route to full-time when a route inspection shows the route has become a fulltime assignment. See M-39, Section 242.122 which provides that regular routes should consist of as nearly 8 hours daily work as possible.*

5. Section 242.122 of the M-39 Handbook states:

*The proper adjustment of carrier routes means an equitable and feasible division of the work among all of the carrier routes assigned to the office. All regular routes should consist of as nearly 8 hours daily work as possible.*

## Contentions:

1. Management violated Article 7, Section 3.D of the National Agreement by failing to convert auxiliary route **[Route#]** to a full-time assignment.
2. The Union contends that the PS Form 1840 Reverse time of **[1840 Reverse total time]** for auxiliary route **[Route #]** satisfies the requirement in Handbook M-39, Section 242.122 that all *regular routes* should consist of as nearly 8 hours daily work as possible.
3. Article 7, Section 3 of the National Agreement sets out management's obligation to create full-time Letter Carrier positions. The Union contends the overall intent of Article 7, Section 3, taken together with the specific language in Article 7, Section 3.D of the National Agreement, Handbook M-39, Section 242.122, and the facts of this case requires management to convert auxiliary route **[Route #]** to a full-time Letter Carrier position.
4. Management's failure/delay in converting auxiliary route **[Route #]** to a full-time position has caused significant harm to the Letter Carrier(s) who should have had the right to bid on this assignment. **[CCA/PTF]** Letter Carrier **[Senior CCA/PTF]** was also harmed, as they should have been converted to Full-Time Regular status in the **[Installation name]** Installation if the newly-created full-time position had become a residual vacancy. The harm to this Letter Carrier exists in the form of missed wages and benefits including, but not limited to, seniority, leave, missed holidays, the right to sign/decline to sign the overtime desired list, the right to bid on vacant assignments, etc.

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

1. That management cease and desist violating Article 7, Section 3.D of the National Agreement.
2. That auxiliary route **[Route #]** be immediately converted to a full-time position and posted for bid in accordance with **[Article 41/LMOU]**.
3. That the successful bidder be paid out of schedule pay for all hours worked outside of the schedule he/she would have worked had route **[route #]** been posted in accordance with the **[Station/Post Office]** LMOU and Article 41 of the National Agreement as follows: **[Insert totals here]**
4. That the successful bidder be paid a lump sum of \$100.00 to serve as an incentive for future compliance.

5. That any residual vacancy which becomes available after **[route #]** is posted for bid, the resulting full-time regular opportunity be filled in accordance with the MOU *Re: Full-time Regular Opportunities – City Letter Carrier Craft*.
6. That Letter Carrier(s) **[Names]** be made whole for all lost wages and benefits that occurred as a result of management's contractual violation.
7. That all payments associated with this case be made as soon as administratively possible, but no later than 30 days from the date of settlement.
8. 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 7 of the National Agreement:

1. PS Form 1840 Reverse for auxiliary route **[Route #]** from the count and inspection that took place from **[Date through date]**.
2. Relative Standing list for the **[Station/Installation]**.

In addition, 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,

\_\_\_\_\_ Request received by: \_\_\_\_\_

Shop Steward

NALC

Date: \_\_\_\_\_



**National Association of Letter Carriers**  
**Request for Steward Time**

To: \_\_\_\_\_  
(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: \_\_\_\_\_