After the week of route count and inspection

anagement recently completed its first round of route inspections this year. There are numerous things that letter carriers, shop stewards and other NALC representatives should take a look at after the week of route count and inspection. A few of these follow.

General

Only the regular carrier's time is used—If a regular carrier is assigned to a route, only that carrier's times can be used to evaluate and/or adjust a route (*M*-39, Section 241.35).

Recording replacement carrier time on PS Form 1840—The days the regular carrier does not carry the route are identified on PS Form 1840. These days are excluded when evaluating the route (*M*-39, Sections 241.32 and 241.33).

Vacant routes—So what should be done with vacant routes? The answer depends on the particular circumstances of each route. For instance, if there is a regular carrier assigned to a route who isn't present during the week of count for any reason, *standard* office time and the 1840-B street time must be used (*M-39*, Section 241.3).

If there is a vacant route with no carrier assigned to it at all, there must be a *qualified* replacement carrier assigned to the route in order for the data collected to be accepted as valid. Whether or not a qualified replacement was assigned to a route that is truly vacant (has no regular carrier assigned to it) during the week of the count is a judgment call that you are going to have to make.

Once again, it depends on the particular circumstances for each route. Let's say a carrier has been holding down the same vacant route two years and he/she is assigned to do the route during the week of count. In this example, it would be difficult to argue that he/she wasn't a qualified replacement. On the other hand, let's say a carrier is assigned to a route during the week of count that he/she doesn't perform on a regular basis, or it's common knowledge that the carrier doesn't normally take his/her breaks and/or works through lunch. In either of these examples, it would be easy to argue that he/she wasn't a qualified replacement.

Exclude Saturday on routes with abbreviated or no Saturday delivery—Saturday is excluded from the count week on routes with abbreviated or no delivery on Saturday (*M-39*, Section 221.11; *M-41*, Section 921.21).

Office

Exception to office standards—Management may make

an exception to normal office standards for letter carriers with 25 years of continuous service or those over the age of 55 (*M*-39, Section 242.214).

Volume adjustments—No volume adjustments will be made to office or street work evaluations unless the mail volume has changed by more than 13 percent since the last regular count and inspection (*M*-39, Section 242.312).

Total office time credit—Office time is normally evaluated at the lesser of the letter carrier's average office time used during the count week or the average standard time during the count week (*M-39*, Section 242.311).

Street

Two street time selection choices—Management has two choices for selecting an evaluated street time for a route: the actual average street time during the count week or the eight-week carrier time card analysis recorded on PS Form 1840-B (*M-39*, Section 242.321).

Street time selection documentation requirement— Management is required to explain why the street time selected was chosen. The selection cannot be solely because the time was lower (*M-39*, Section 242.322).

How to record auxiliary assistance—When a letter carrier receives auxiliary assistance on the street during the count week, the replacement's time is *not used*. Instead, the time it took the regular carrier to deliver the same portion of the route on the day of inspection is added to the street time for the day (*M*-39, Section 241.35d).

Improper deductions of street time—Management may not make a time deduction just because a letter carrier allegedly failed to finger mail or take proper shortcuts. Instead, management is required to instruct the letter carrier to use proper procedure and make every effort to reinspect the route prior to adjustments being implemented (*M-39*, Section 242.344).

Deductions due to operational changes—Management is required to document and explain any changes made to a carrier's base time due to an operational change. It must be discussed during consultation (*M-39*, Section 242.345).

For information and guidance on the carrier consultations that take place after the count week, see pages 56-59 of the 2011 NALC Letter Carrier Resource Guide. This guide was mailed to every active member and is also available on the City Delivery page on the NALC website.