# **Principles of route inspections**

hroughout March and April, the Postal Service conducted route inspections in offices all over the country. More inspections are planned for May. Route inspections are governed by Chapter 2 of Handbook *M-39*, Management of Delivery Services, and Chapter 9 of Handbook *M-41*, City Delivery Carriers Duties and Responsibilities. These USPS handbooks are enforceable through Article 19 of the National Agreement. A number of national settlements and memoranda of understanding are also applicable and must be complied with. This column will explain a few basic principles of route inspections established in these documents.

#### **Basic principles**

**M-39**, Section 242.11 establishes the goal of all route inspections: to adjust routes as near to eight hours as possible. It 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.

Along the same lines, Section 911.2 of the *M*-41 states:

The count of mail is used to gather and evaluate data to adjust routes fairly and equitably to insure that the workload for each route will be as near as possible to an 8-hour workday for the carrier.

#### Before the route inspection

**Posting notices**—Two separate types of notice of the route inspection are required. First, management must determine the week of inspection as far in advance as possible and notify the local union. Section 211.2 of the *M*-39 states:

The period selected for the mail count and route inspections should be determined as far in advance as possible, and the local union should be notified of this schedule. If it is necessary to change the period, the local union should be notified of the revised schedule as far in advance as practicable.

Management also must post a notice of a more specific schedule at least five working days before the start of the count in accordance with *M*-39, Section 215.1, which states:

A notice must be posted at the delivery unit in advance of the scheduled mail counts and route inspections, showing the beginning date of the count for each route and the day and date each route is scheduled for inspection. This notice must be posted at least 5 working days before the start of the count period. If a decision is made to inspect on days other than the scheduled date, 1 day's advance notice must be given.

**Reporting times**—Letter carriers will be required to report early during the week of inspection in most instances. *M-39*, Section 215.2 requires management to post the schedule of starting times as follows:

Not later than the Wednesday preceding the count week, carrier schedules shall be posted for those routes requiring an earlier starting time to count the mail.

**Unit review**—*M-39*, Section 214 requires management to conduct a thorough review of all operations in the delivery unit. Section 214 lists the minimum operations that should be reviewed. Failure to perform this review as specified in Section 214 constitutes a violation of Article 19 of the National Agreement.

**Dry-run count**—Another important obligation management has before a route inspection is to conduct a "dry run" with all the letter carriers in the unit within 21 days of the count week. *M-39*, Section 217 and *M-41*, Section 917 establish the proper procedures for dry-run counts. The purpose of the dry run is to educate the letter carriers on how to fill out PS Form 1838-C, as each letter carrier will fill out the form each day of the route inspection.

### **During the Route Inspection**

**Schedule**—*M*-39, Section 221.11 covers the schedule of days to be used for the count. Please note that routes with abbreviated or no delivery on Saturday *exclude Saturday from consideration*. Section 221.11 states:

The count of mail on all letter delivery routes, regular and auxiliary, must be for 6 consecutive delivery days on one-trip routes and for 5 consecutive delivery days, exclusive of Saturday, on two-trip routes or one-trip routes with abbreviated or no delivery on Saturday. It is not mandatory that mail counts begin on Saturday and continue through Friday so long as they are made on consecutive delivery days.

**Only the regular carrier's time counts**—Only the regular carrier's time will count toward the evaluation of the route. *M-39*, Section 241.33 states:

Bracket [] the time entries in columns A, B, C, D, and E for the days on which the route was served by a replacement carrier or carrier technician T-6 because these figures are to be **excluded** when entering the figures on the total line for columns A, B, C, D, and E. (Emphasis added.)

## **Principles of route inspections** (continued)

Section 241.35 also reinforces this principle in several places.

**Multiple days of inspection**—NALC and USPS recently agreed to extend the national memorandum of understanding on this topic (M-01777) until May 26, 2013. This MOU states, in relevant part:

Local management will, if it determines it necessary when scheduling an inspection to inspect on more than one day, inspect on no more than three days during the week of count and inspection. If local management elects to inspect on two or three days during the week of count and inspection, local management will be responsible for completion of the 1838-C one of the days. The letter carrier will count the mail and complete the 1838-C on the other days of inspection. When local management elects to inspect on two or three days, the PS Form 3999 closest to the selected street time on the PS Form 1840 will be used to transfer territory.

**Conduct of the route examiner**—Section 232.1 of the *M-39* states that the route examiner *must*:

a. Not set the pace for the carrier, but should maintain a position to observe all delivery points and conditions.

b. Not suggest or forbid any rest or comfort stops but should make proper notations of them.

c. Not discuss with the carrier on the day of inspection the mail volume or the evaluation of the route. These matters must be discussed with the carrier at a later date when all data has been reviewed and analyzed.

d. Make notations on the day of inspection on the appropriate form or separate sheet of paper of all items that need attention, as well as comments on the day of inspection. Also list any comments or suggestions for improving the service on the route, as well as suggestions or comments made by the carrier during the course of the inspection for improvement in delivery and collection service.

e. Make comments and suggestions clearly, and in sufficient detail for discussion with the carrier and for decision-making purposes. The manager who will actually discuss the results with the carrier must have enough facts and figures to reach a final decision on any necessary adjustments to the route.

**Office time evaluation**—Basic rules for evaluating office time are covered in the *M*-39, Section 242.311, which states:

Under normal conditions, the office time allowance for each letter route shall be fixed at the lesser of the carrier's average time used to perform office work during the count period, or the average standard allowable office time. **Street time evaluation**—Section 242.32 of the *M*-39 spells out the procedure for evaluating street time. Section 242.321 states:

For evaluation and adjustment purposes, the base for determining the street time shall be either:

a. The average street time for the 7 weeks random timecard analysis and the week following the week of count and inspection; or

b. The average street time used during the week of count and inspection.

Section 242.322 covers the selection of street time, stating:

The manager will note by explanatory Comment on the reverse of Form 1840 or attachments thereto why the base street time allowance for the route was established at the time selected. **The manager's selection of the street time** allowance cannot be based on the sole criterion that the particular time selected **was the lower**. (Emphasis added.)

**Transferring territory**—The rules management must abide by when deciding which territory to transfer from route to route are set forth in *M-39*, Section 243.242, which states:

To determine the territory to be transferred to or from any route, consider that:

a. Scheme changes should be kept to a minimum and simplified where possible.

b. Routes should be compact, avoiding dog-legs and should not cross ZIP Code boundaries except in unusual circumstances.

c. Routes should begin and end as near as possible to the delivery unit or transportation.

d Excessive retracing or deadheading should be avoided.

e. Adjustments should be made so that future growth may be absorbed by auxiliary routes.

f. Variations in territory, mail volume and methods of delivery will affect the final adjustment.

**Discipline**—*M-39*, Section 242.332 protects letter carriers from being disciplined simply because they did not meet standards. It states:

No carrier shall be disciplined for failure to meet standards, except in cases of unsatisfactory effort which must be based on documented, unacceptable conduct that led to the carrier's failure to meet office standards.

**Contract Talk columns in the coming months will delve** deeper into more specific issues that shop stewards should closely monitor during route inspections.