

USPS notifies us of unilateral consolidated casing test



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USPS notified NALC, in a letter dated Jan. 9, 2019, of their intent under Article 34 of the National Agreement to collect data for the purpose of developing a study related to determining the impact of consolidated casing assignments on city delivery routes. The proposed study appears to involve the same contractual issues NALC has raised in a dispute involving the 2011 caser/streeter test, which remains pending at the national level. In addition, the proposed test, as described, does not appear to be authorized by Article 34 of the National Agreement.

This is a unilateral test and NALC has not agreed to participate in this process. However, NALC representatives will be closely monitoring and observing the testing process.

Following the receipt of this notification, we attended several meetings to clarify the proposed study and the potential impact on our craft. Based on these meetings, our understanding of the Postal Service's concept is explained below.

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The particulars

During the testing process, USPS intends to consolidate six routes into one casing assignment for one letter carrier to case and pull down while other letter carriers come in, get their keys, scanners and accountable items, then go straight to the street. USPS believes it can reduce the amount of office time, including fixed office time, by combining casing duties on multiple routes. USPS also claims that the consolidated casing concept will allow for additional work space to accommodate the increase in parcel volume. Since 2014, USPS reports a reduction in volume of letters and flats of 7 billion pieces, while parcel volume has increased by 641 million pieces during the same time period. USPS believes that the shift in mail mixture has created a significant imbalance between current office time usage and the facility space needed to process parcels. USPS believes this consolidated casing method may resolve both issues.

Carriers performing casing duties will report early in the morning and will have their start times adjusted accordingly. USPS states that casing-assignment carriers may start as early as 5:45 a.m. These carriers will case a total of six routes, three at a time, and prepare them for street delivery. The newly designed consolidated case will consist of three pieces of casing equipment in the traditional horseshoe design with one complete route in each piece of equipment. The cases will have double-sided address labels on plastic strips affixed to the case that can be reversed. USPS uses various methods for attaching these labels. This case labeling method is commonly referred to as 2-into-1 casing for offices already using this system. The casing carrier will case three routes for delivery, pull down the routes, switch the case labels, then case and pull down three additional routes. For example, the caser will case and pull down routes 1-3, then switch the case labels and case routes 4-6. Full-time letter carriers performing casing assignments may be given additional street duties to fulfill their eight-hour requirement.

Carriers performing street duties will report later in the day, with start times scheduled to coincide with the projected time the casing duties are complete. Assignments with street duties may be adjusted with additional deliveries to make up for the loss of office time. USPS states that these carriers will report in two different groups, with the first group to begin tour approximately 8 to 8:30 a.m. and the second group perhaps an hour or an hour and a half later. All letter carriers performing street duties will obtain their own accountable items prior to leaving for the street, and afternoon return-to-office duties will not change.

Some of you may recall the caser/streeter concept that USPS tested in 2011. This test involved some letter carriers performing office duties for multiple routes while the remaining carriers delivered on the street. This test is slightly different based on the proposed case configuration. In caser/streeter, each route maintained its own case, while in this test, multiple routes will be combined into one case. The current test appears to be the Postal Service's attempt to revisit the prior unsuccessful caser/streeter route pilot.

Three phases of testing

On March 21, USPS sent a follow-up notification letter identifying one delivery unit, Annandale, VA, in which testing is scheduled. Evaluation of the existing assignments were to begin on April 8, with testing tentatively to have commenced on May 4. USPS indicates that testing will be done in three phases and has identified one location where this consolidated casing concept is being introduced. In

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Phase Two of the test, USPS intends in June to initiate six additional sites, one in each postal area, with these locations to be identified in the near future. Phase Three of the test will involve 200 sites to be initiated in August, with at least one site in each postal district.

NALC anticipates that the test will be rolled out on a larger scale in the near future. USPS states that there are approximately 1,000 additional delivery units it believes to be suitable for this consolidated casing test. Local branches should notify their NBA office immediately if management begins testing in other locations.

This management-initiated pilot test does not alter any provisions of the National Agreement.

As always, letter carriers should protect themselves by making proper clock rings, requesting auxiliary assistance/overtime via PS Form 3996, Carrier-Auxiliary Control and documenting curtailed mail via PS Form 1571, Undelivered Mail Report. Proper clock rings are vital to ensure that street delivery, auxiliary assistance, waiting time, parcel delivery and time spent casing are recorded correctly. Letter carriers may be assigned to perform only parcel delivery for multiple routes. If this occurs, these carriers should ensure that clock rings reflect time spent delivering parcels on a particular route. Likewise, if a carrier is performing office duties, accurate time entries need to be recorded so that the time is credited to the proper assignment.

Sections 131.41 and 131.42 of *Handbook M-41, City Delivery Carriers Duties and Responsibilities* require you to verbally inform your manager when you believe you cannot carry all the mail distributed to your route in eight hours or within your normal schedule. Letter carriers should continue to provide verbal notification and request a PS Form 3996 if you require overtime or auxiliary assistance to meet management's expectations.

Management is obligated via Section 122.33 of *Handbook M-39, Management of Delivery Services* to provide you with a PS Form 3996 when you request it. When you request a 3996, no matter what your manager says to you, say, "I am requesting a 3996" and explain the reasons for your request.

In addition, if you are instructed by management to curtail mail, you should request and complete a PS Form 1571 documenting the undelivered mail and have it completed by management. You also should request a copy of the signed PS Form 1571. Federal law prohibits improper delay of mail and in some instances letter carriers have received legal citations for failing to document curtailed mail. A signed copy of this form is your protection against potential legal or disciplinary actions.

Article 41 of the National Agreement requires management to address a letter carrier's request for assistance

promptly and to provide copies of both completed forms upon request.

Article 41, Section G of the National Agreement provides:

G. The Employer will advise a carrier who has properly submitted a Carrier Auxiliary Control Form 3996 of the disposition of the request promptly after review of the circumstances at the time. Upon request, a duplicate copy of the completed Form 3996 and Form 1571, Report of Undelivered Mail, etc., will be provided the carrier.

If you are denied either form or the requested copies, immediately request to see your shop steward.

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Be watchful for violations

Additional contract violations may occur as a result of the consolidated casing test. Union representatives should be watchful for any violations of the National Agreement, and investigate and file grievances accordingly. For example, union representatives and letter carriers should be wary of contractually improper schedule changes, bid assignments, route inspection and adjustment processes and overtime distribution. These examples are only a sample of possible contractual violations related to this initiative.

Branch presidents or union officials should *not* make any local agreements with regard to this unilateral USPS test. NALC is committed to protecting the rights and benefits afforded city letter carriers in the National Agreement throughout the testing process, and will keep you updated on this initiative as information becomes available.