Director of Safety and Health

Ergonomics



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n Feb. 9, USPS published Postal Bulletin 22617, showcasing its commitment to ergonomics with a cover story titled "Using Safe Ergonomics Practices to Deliver for America."

The article emphasized the following on page 3:

Ergonomic principles commonly used in USPS® facilities include:

- Modifying the workspace to reduce the reaching necessary for letter carriers by moving the carrier closer to the object or recommending using a reach-extender tool.
- Raising the letter carrier's workspace with equipment, such as a pallet lifter or a container tilter, to eliminate bending and overreaching when

unloading packages or mail trays.

- Adjusting a computer workstation to ensure that monitors are at the right height for optimum viewing, the keyboard and mouse are positioned at about elbow height, and everything is within easy reach.
- Improving methods, such as work practices and techniques, or applying administrative methods, such as job rotation, to help decrease risk factors.

Ergonomics is not new to the USPS, but many unenlightened supervisors and managers find it a hindrance. Many times in the past, I have received calls from shop stewards, branch leaders, and national business agents and their assistants asking what to do when management took away an ergonomic fix.

The smart way to make changes is to get the input of those who are affected by the proposed change. It would be even more beneficial to get the input of the affected employee's union before making the changes.

There is, however, a strong attraction for management to the Ouija board method of decision-making, which tells them what they want to hear without telling them what they need to hear when they attempt to utilize office space.

When we first embarked on our study, and rollout, of ergonomics, it was not part of the culture and it was not an obligation.

That's no longer the reality in our postal environment. It is embedded into the National Agreement, the Employee and Labor Relations Manual (ELM) and the EL-809, which guides the responsibilities of the area and installation safety committees.

More than 20 years ago, the NALC initiated a nationallevel grievance asserting that letter carriers were risking injury to their lower backs by reaching into the hampers, as they were used at the time. The national parties identified the issue as:

...whether requiring city carriers to bend and lift when using a 1046-P hamper violates Article 14 of the National Agreement...

The grievance was resolved on March 3, 2004 (Mo1477) as follows:

The parties agree that placing inverted plastic trays in the bottom of the 1046-P hamper as an insert is one way, among others, to address any local bending and lifting concerns.

The settlement did not disturb nor redefine the issue. The resolution found a safe way to use the hamper, acknowledging the solution to a bending and lifting concern that was rooted in Article 14.

Four years later, NALC President William H. Young and Vice President of Labor Relations Doug A. Tulino at USPS Headquarters, memorialized their agreement on ergonomics tools (Mo1773). This document included the following observations:

Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling mail. Pilot testing and the Customer Service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may help reduce injuries and Muscular Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects).

The three tools listed in the document are:

- Utility/mail hooks—Plastic rods with a hook to extend the reach of the carrier in loading and unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles.
- Hamper inserts—Inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail.
- Mail elevation units—"Milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting). Sort bins attached to carrier cases are also alternatives for raising flats off the floor. (Flats Sequencing System sites

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Contract Talk

by the Contract Administration Unit

Article 25 (continued)

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that employee will assume the hours of the vacancy without obligation to the employer for out-of-schedule overtime.

Carriers filling temporarily vacant carrier technician assignments will receive additional compensation equivalent to 2.1 percent of the employee's applicable hourly rate for all paid hours while working the assignment. Pay for work while in a higher-level position is governed by Article 25, Section 2, which provides in relevant part:

An employee who is detailed to higher-level work shall be paid at the higher level for time actually spent on such job. An employee's higher-level rate shall be determined as if promoted to the position.

Additionally, the Step 4 Settlement H4N-5R-C 44093, Feb. 10, 1989 (M-00902), provides that the following management document known as the "Brown Memo" (Nov. 5, 1973, M-00452) is a contractual commitment and remains in effect. The memorandum explains that when a replacement employee is entitled to higher-level pay when no employee is detailed under the provisions of Article 25, Section 4:

When a carrier technician (T-6) is absent for an extended period and another employee serves the series of 5 routes assigned to the absent T-6, the replacement employee shall be considered as replacing the T-6, and shall be paid at the T-6 level of pay for the entire time he or she serves those routes, whether or not he or she performs all of the duties of the T-6. When a carrier technician's absence is of sufficiently brief duration so that his replace-

ment does not serve the full series of routes assigned to the absent T-6, the replacement employee is not entitled to the T-6 level of pay. In addition, when a T-6 employee is on extended absence, but different carriers serve the different routes assigned to the T-6, those replacements are not entitled to the T-6 level of pay. The foregoing should be implemented in a straightforward and equitable manner. Thus, for example, an employee who has carried an absent T-6 carrier's routes for four days should not be replaced by another employee on the fifth day merely to avoid paying the replacement higher-level pay.

Management has an obligation to fill temporarily vacant carrier technician positions even if that means assigning a CCA to the position. National Arbitrator Snow held in C-10254, Sept. 10, 1990, that management may not assign different employees on an "as needed" basis to carry a route on a T-6 string when a vacancy of five or more days is involved; instead, such vacancies must be filled according to Article 25. While CCAs cannot request a higher-level assignment and are not eligible for higher-level pay under Article 25, CCAs can be administratively assigned by management to vacant carrier technician assignments. When this occurs, the CCA's PS Form 50, Notification of Personnel Action must be revised to reflect that they are assigned to a carrier technician position.

City carriers with questions about Article 25, higherlevel pay, or filling temporarily vacant carrier technician assignments should contact their shop steward or branch officer.

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should coordinate plans for future equipment based on anticipated flat volume to be handled at the case.)

The *ELM* contains two key ergonomic references at §section 811.22 in its Vision Statement and in Section 833.1, in which ergonomics is a required element in the development of new equipment, vehicles and facilities.

By letter dated Nov. 13, 2013 (USPS3574), the USPS provided the NALC with notice of Article 19 changes to the *EL*-

809, Guidelines for Area/Local Joint Labor Management Safety and Health Committees, incorporating ergonomics as a required element to be discussed in all safety meetings.

If your supervisors or managers are abandoning ergonomics as an element of their obligation to provide a safe work environment, we need to address this through discussion at safety committee meetings and labor-management meetings at the installation level, and then if necessary through the grievance procedure.