

Route inspections, Part 5

Beginning with the July 2024 *Postal Record*, Contract Talk articles have discussed the route count, inspection and evaluation process found in Chapter 2 of *Handbook M-39, Management of Delivery Services*.

This article will go back to the beginning of this series and discuss the difference between the number of days that routes with abbreviated or no delivery on Saturday are counted as opposed to routes with full delivery on Saturday during the week of mail count and inspection.

Let's start with the applicable language that is contained in both the M-39 and Handbook M-41, City Delivery Carrier Duties and Responsibilities:

Section 221.11 of the *M-39 Handbook* states:

221.11 Schedule

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.

Section 921.2 of the *M-41 Handbook* states in relevant part:

921.2 Schedule

921.21 The count of mail period on all letter delivery routes, both regular and auxiliary, shall be (a) for 6 consecutive delivery days on one-trip routes and (b) for 5 consecutive delivery days, exclusive of Saturday, on multi-trip routes or one-trip routes with abbreviated or no delivery on Saturday.

921.22 It is not mandatory that mail counts begin on Monday and continue through Saturday but they must be made on consecutive delivery days.

As you can see, Saturday is supposed to be excluded from the count week on routes with abbreviated or no delivery on Saturday. The language in Section 221.11 of the *M-39* and Section 921.2 of the *M-41* is crystal clear. Therefore, routes with abbreviated or no delivery on Saturday are only inspected for five consecutive delivery days (Monday-Friday).

Management might try to convince you that if Saturday is excluded from routes with abbreviated or no delivery on Saturday, then Monday must also be excluded. This is simply not true. That is something they made up and try to sell to many letter carriers and stewards. Do not fall for this trick!

Management might also try to convince you that Saturday is excluded from the week of route count and in-

spection for routes with abbreviated or no delivery on Saturday, but is not excluded from the eight-week Carrier Time Card Analysis (1840-B). This is also not true. Do not fall for this trick either!

The reason for this rule is totally logical. For instance, if you have a route that has two hours of closed businesses on Saturday that you do not deliver to, that will make your street time 120 minutes short for the week. If Saturday was included in your street time credit, this would make your average street time 20 minutes shorter than what the route really takes to deliver when you spread the 120 minutes of time over six days. Therefore, even if your route was adjusted to 8:00 hours on paper, it would really be 8:20.

Arbitrator Miles, in his regular panel arbitration decision (C-33600, Oct. 1, 2018), specifically addressed this issue as follows:

With regard to the issue of whether delivery was abbreviated for particular routes on Saturdays, Section 221.11 states that:

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 dates.

Thus, if abbreviated delivery or no delivery on Saturdays, then the mail count must be for five days exclusive of Saturday. In this regard, the Postal Service witness, who was an operations program specialist, admitted that delivery was abbreviated on Saturdays for eight of the 13 routes at the West Station. She countered, by relying upon Section 241.33 of the *M-39 Handbook*, which provides that:

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.

However, this assertion does not follow logically because if a T-6 carried a route on Saturday, it is to be excluded in any event, and T-6s would carry routes on a Saturday every six weeks. Also, if a route is carried by a replacement carrier on a Saturday, it is to be excluded as well.

In any event, the Saturday street time would still be

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Before we ring in the new year, I encourage you to reflect on what this anniversary means to you, your team, and the families we serve. Together, we are stronger, and together, we will continue to make a difference.

Wishing you and your loved ones a holiday season filled with joy, peace and a renewed sense of connection and purpose for the year ahead.

Together, we bring forward the spirit, the vision, and the commitment that define MDA.

MDA and NALC dream of a day when every child and adult diagnosed with muscular dystrophy will have access

to treatment or even to a cure. NALC's fundraising helps MDA with that promise as it builds on recent successes.

On that note, the beginning of the new year is a time when many people make resolutions to better themselves or those around them. Has your branch set any goals for community service for 2025? If not, I hope your executive board sits down soon to plan for the year and considers helping with MDA and the needs that are still there.

And if your branch is planning an activity, please let NALC know well in advance. We can use the "Deliver the Cure" Facebook page to help promote the event.

—Christina Vela Davidson

Contract Talk

by the Contract Administration Unit

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abbreviated regardless of who carried the route, according to Section 221.11, because if there is no delivery or if delivery is abbreviated on a Saturday it is not to be included pursuant to Section 221.11 of the *M-39 Handbook*. That section is clear that for one-trip routes with an abbreviated or no delivery on Saturday, the count of mail must be for five consecutive delivery days, exclusive of Saturday. Section 241.33 of the *M-39 Handbook* does not obviate the requirement to comply with Section 221.11 of the *M-39 Handbook*.

This case had several other violations, but for the violation of this rule in particular, the arbitrator ordered USPS to cease and desist from future violations and awarded:

For the eight routes identified with abbreviated Saturday delivery, the Postal Service is directed to reinspect and adjust those routes without consideration of the Saturday delivery times in accordance with Section 221.11 of the *M-39 Handbook*. This shall be accomplished within 90 days of the date of this Award.

Route inspection teams come into an office for a week, do everything they can to build overburdened routes, and head to the next town, leaving both the letter carriers and local managers to deal with the mess they created. The Operations arm of the USPS has historically failed to grasp the concept that a square peg does not fit into a round hole. Letter carriers and union representatives alike should familiarize themselves with the route count and inspection process outlined in Chapter 2, *Handbook M-39* and Chapter 9, *Handbook M-41*. The more educated we are in the inspection and adjustment of routes, the more prepared we will be when management brings that square peg to our offices.

The NALC offers many resources to assist letter carriers and shop stewards with obtaining fairly adjusted routes. Two free publications/resources that every branch in the

country should arm themselves with are:

1. **The NALC Route Inspection Pocket Handbook**—This booklet fits in your shirt pocket and is specifically designed to assist letter carriers during the week of route inspection. Every letter carrier who goes through the route inspection process should be provided with a copy of this booklet in advance of the week of mail count and inspection. If your branch does not already have a supply, *NALC Route Inspection Pocket Handbooks* are available at no charge through the NALC Supply Department. Contact your national business agent's office to obtain copies. Note: The pocket handbook is not available online.
2. **The 2018 NALC Guide to Route Inspections**—This book is specifically designed to assist shop stewards before, during and after the week of route inspection. This resource also contains a section that thoroughly explains how to read, and the purpose of, all the route inspection forms USPS uses to evaluate and adjust routes. Once you understand how to read these forms and what to look for, the task of investigating route inspection grievances becomes much easier. It is highly recommended that every shop steward study and become familiar with this guide when USPS announces that an office you are responsible for will be inspected. The guide is available at nalc.org/workplace-issues/city-delivery/route-adjustments.

There are more resources related to route inspections and adjustments available on the NALC website at nalc.org/workplace-issues/city-delivery/route-adjustments. Past Contract Talk articles pertaining to these issues are also available on the NALC website at nalc.org/workplace-issues/resources/nalc-publications.