

# Route inspections

**D**uring the upcoming months, the Postal Service will again be conducting route count and inspections in offices around the country. The results of these inspections may lead to route adjustments. The rules governing inspections and adjustments are found in Chapter 2 of *Handbook M-39, Management of Delivery Services* and Chapter 9 of *Handbook M-41, City Delivery Carriers Duties and Responsibilities*. The provisions contained in these USPS handbooks are enforceable through the grievance procedure via Article 19 of the National Agreement. A number of national settlements and memorandums of understanding (MOUs) are also applicable and enforceable.

This article will explain some of the basic principles of route inspections and the Postal Service's responsibilities before, during and after the week of count.

## Basic principles

The goal of any route inspection and adjustment is to ensure all regular routes are as close to eight hours as possible. This requirement is found in Section 242.122 of *Handbook M-39*, which states:

242.122 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.

In addition to the language in *Handbook M-39*, Section 911.2 of *Handbook M-41* states the following:

911.2 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 inspection

Prior to determining whether routes need to be inspected, management is required to conduct a unit and route review. The results of these reviews must be shared with the local union and the regular carriers serving the route as stated in Section 211.1 of *Handbook M-39*. If the Postal Service determines the need to conduct a route count and inspection following these reviews, they are required to issue two separate notices.

Under Section 211.2 of *Handbook M-39*, management must determine the week of inspection and notify the local union. Management is required to post a schedule listing the day each route will be inspected. The day of inspection is the day a manager will count the route's

mail and accompany the carrier on the street. This notice must be posted at least five working days prior to the beginning of the inspection in accordance with Section 215.1 of *Handbook M-39*. Letter carriers may be required to start early on certain days in order to count mail. Section 215.2 of *Handbook M-39* requires management to post the schedule of starting times.

Prior to beginning the mail count, management has an obligation to train letter carriers on the proper procedure for counting mail and completing the PS Form 1838-C, Carrier's Count Mail-Letter Carrier Routes Worksheet as each letter carrier will fill out the form during the week of inspection. This "dry run" training must be conducted within 21 days of the beginning of the count week. Section 217 of *Handbook M-39* outlines the procedures for this training.

## During the mail count

Section 221.11 of *Handbook M-39* covers the schedule of days to be used for the count. Please note that Saturday is excluded from consideration for routes with abbreviated or no delivery on Saturday.

Each letter carrier will complete the PS Form 1838-C each day except for the day of inspection, and this requirement applies to both the regular and replacement carrier as stated in Section 221.132 of *Handbook M-39*. The only exception to this provision is on the day the route is inspected and management completes the form; however, the carrier has the right to verify management's count. This provision is found in Section 221.131 of *Handbook M-39*. The national parties' mutual understanding of this section is explained in the Step 4 settlement for Case No. H4N-5T-C42333 (M-00814).

Generally, each route will be inspected on one day during the process; however, management may conduct up to three days of inspection. If a route is inspected on more than one day, the manager will complete the PS Form 1838-C on only one of these days, as outlined in the MOU Re: Multiple Days of Inspection (M-01777).

## Line items on PS Form 1838-C

The most important part of completing the PS Form 1838-C is understanding the line items and how they are properly recorded. Section 222.2 of *Handbook M-39* contains descriptions of each line item, which should be explained during the dry-run training conducted prior to the inspection.

Line Items 1 through 13 record the mail volume based on the count. The times associated with casing and pulling mail are not recorded on the form. Line Items 14 through 23 record the time spent performing other office duties. Items with multiple entries should be differentiated by a letter designation, such as 21a, 21b, etc.

For most letter carriers, Line Items 21-23 are the most difficult to understand and record properly. Section 922.51 of *Handbook M-41* and Section 221.214 of *Handbook M-39* contain the language pertaining to lines 21-23 of the PS Form 1838-C.

Line 21 entries are described as “recurring” office functions, or the duties letter carriers complete every day. For example, obtaining and setting up the mobile delivery device, safety and service talks, retrieving small parcels and rolls (SPRs), and discussing daily expectations with the supervisor are all entries which are recorded on Line 21. When you spend time performing a Line 21 function, use the comments section on the form to describe the function.

Line 22 entries are “non-recurring” office functions which do not occur every day. Some of these entries may be things like conversations with the route inspector or a fire drill. Line 22 entries are also documented in the comments section of the PS Form 1838-C, the same as Line 21.

Line 23 entries are exclusive to time spent counting mail and completing the form or verifying the count completed by management on the day of inspection. It is important that letter carriers accurately record the time associated with each line item when completing the PS Form 1838-C. These times will be used to determine the office time during the route evaluation.

## Inspection day and conduct of route examiner

Route evaluation and inspections can be stressful for city letter carriers. Letter carriers are used to working independently and may be uncomfortable having a route examiner watching them all day long. Route examiners are there to observe letter carriers during the performance of their daily duties and record information. Sections 231 and 232 of *Handbook M-39* speak to the conduct of the route examiner.

Section 231.5 states:

231.5 The route examiner must inform the carrier that he/she intends to make a fair and reasonable evaluation of the workload on the route and that in order to do so the carrier must perform duties and travel the route in precisely the same manner as he/she does throughout the year.

The examiner should impress the carrier with the fact that management is just as anxious and desirous of obtaining an accurate count of mail and inspection of the route as the carrier is, so that a fair and equitable evaluation of the workload on the route may be made.

According to Section 232.1, 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.

In the national-level pre-arbitration for Case No. H1N-1N-D 31781 (M-00304), the parties agreed that there is no set pace at which a carrier must walk and no street standard for walking. Letter carriers should perform their street duties exactly as they do every other day, such as taking comfort/rest stops as needed. Management should not deduct reasonable comforts/rest stops from the total street time during route inspections if deduction of the time is contrary to past local practice as explained in Step 4 settlement for Case No. NCE 2097 (M-00242). If excessive time for comfort/rest stops is deducted, the matter should be discussed with the carrier.

## After the week of count route evaluation

As stated earlier, the goal of any route count and inspection is to adjust the routes to as close to eight hours as possible. With this in mind, management must evaluate the office and street times for each route and determine whether the route is either overburdened and requires relief or less than eight hours and requires an

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## Route inspections (continued)

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addition. After the completion of the count and inspection, prior to any adjustments being made, management should consult with the regular carrier on the route and explain the evaluated office and street times.

The PS Form 1840, Carrier Delivery Route—Summary of Count and Inspection provides a synopsis of the data management will use to evaluate the route and make any needed adjustments. This is a two-page form consisting of PS Form 1840 and PS Form 1840 (reverse). The first page includes the data from the count and inspection used for evaluating the route while the second page is used to show the office and street times selected for the evaluation, as well as any adjustments made to the route.

The information on PS Form 1840 is derived from several sources, including other forms used during the count and inspection process.

The PS Form 1838, Carrier's Count of Mail—Letter Carrier Routes (Mngt. Summary) contains the information recorded on the PS Form 1838-C by the carrier servicing the route or the inspector who completed the form on the inspection day(s). Copies of PS Forms 1838 and 1840 must be provided to the carrier prior to the evaluation consultation. This requirement is found in Section 923.1 of *Handbook M-41*.

The PS Form 1840 also shows the total street time used by both regular and replacement carriers each day of the inspection as well as the average street time for the week. Only the time used by the regular carrier should be used to determine the average as explained in Section 241.33 of *Handbook M-39*. Exceptions to this provision are in the case of a full-time route without a regular carrier or an auxiliary route. In these cases, the carrier who serviced the route during the week of inspection would be used to determine the average street time.

Once the data has been transferred to the PS Form 1840, management must evaluate the data and determine the office and street times for each route. Union representatives should ensure that the data is accurately transferred to this form as any discrepancies could have a negative impact on the route evaluation and any subsequent adjustments.

### Evaluated office time

When determining office time, management must select either the average office time used by the carrier during the week of inspection or the standard office

time allowance. This requirement is found in Section 242.311 of *Handbook M-39*.

Standard office time is determined by dividing the number of cased letters by 18, the number of cased flats by eight, and the total number of cased letters and flats by 70. These three figures are then converted to minutes and added to the standard office allowances for the line items on the PS Form 1838-C (excluding time spent performing line 22 and 23 functions) to establish a time. A detailed explanation of line items and standard time allowances is found in Exhibit 222.214a(4) of *Handbook M-39*.

Management does not have the right to reduce the office time below the standard time based on allegations of time-wasting practices during the mail count. National Arbitrator Benjamin Aaron addressed this issue in Case No. NC-C-11675, where he found “even though the Postal Service can demonstrate that the grievant was regulating his performance, it cannot reduce the office time below the average standard allowable time.”

### Evaluated street time

When determining the street time, management must select either the average street time during the week of inspection or the eight-week average street time from the PS Form 1840-B, Carrier Time Card Analysis. This requirement is found in Section 242.321 of *Handbook M-39*. In addition, Section 242.322 states: “The manager’s selection of the street time allowance cannot be based on the sole criterion that the particular time selected was the lower.”

The data from the seven-week random analysis is determined based on the language in Section 242.323 of *Handbook M-39*, which states in part:

Within 4 weeks prior to the week of count and inspection, the local union representative will make a random drawing of numbered lots from 1–4 to be used in determining the 7 random weeks to be selected for all routes at the delivery unit.

A complete explanation of the random draw process is provided in Section 242.323 of *Handbook M-39*. Once the weeks have been selected, the data is transferred to PS Form 1840-B. A sample of this form, which contains four pages including the instructions, is found in Exhibit 213d of *Handbook M-39*.

This Contract Talk has discussed the major compo-

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sized that the shutdown didn't just affect the workers, but everyone who uses any federal or government agency. From the most vulnerable people relying on food and health care assistance to travelers affected by air traffic control and TSA shortages. The panel discussion reminded us that every American is affected by the loss of government employees.

**And, of course, we completed the business of the convention.** Convention delegates passed resolutions, voted on constitutional amendments, elected new national officers, and, in true CLUW fashion, debated all of it heatedly. Delegates passed 15 resolutions on topics including support and aid for the people in Gaza; ending military occupation in Washington, DC, and other cities; support for the union garment workers in Asia who have been denied a living wage; and denouncing attacks on diversity, equity and inclusion efforts and work solidarity.

Another celebratory and also somewhat poignant moment occurred when the convention body bid farewell to our retiring executive officers. Elise Bryant has passionately served as CLUW president for the last eight years. Elise has dedicated many, many years fighting for the labor movement and women's issues. She has been a great friend and mentor. Also retiring were Joanne Sanders (International Alliance of Theatrical Stage Employees), executive vice president; Judy

Beard (APWU), treasurer; and Jennifer Grigsby (AFGE), recording secretary. All these dedicated ladies have given countless hours to serve not only their respective unions, but also CLUW. They will be dearly missed.

With many national officers retiring, many new members were elected to the National Officers Council. I was fortunate to be reelected by the delegation and am very grateful to continue serving as a vice president representing NALC. My sincerest thanks go to the NALC membership and the CLUW delegates who put their faith and trust in me.

However, not all of the convention was a celebration. Despite growing public support for the labor movement, delegates from many different unions shared a collective concern that the overall political climate was not favorable and achieving our goals was going to be particularly challenging in the coming years. In the coming months, CLUW will continue to focus on the midterm elections and get-out-the-vote initiatives.

**The convention left us inspired to seek fresh perspectives and to advocate for women in the workplace.** We encourage all of our NALC sisters and siblings to look into CLUW chapters in your area and get involved. For more information on CLUW, its mission and how to join, visit [cluw.org](http://cluw.org).

## Contract Talk

by the Contract Administration Unit

# Route inspections (continued)

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nents of route inspections leading up to the actual process of adjusting routes after the week of count and inspection. Future articles will discuss the adjustment process, as outlined in Section 243, and Special Route Inspections conducted in accordance with Sections 271 and 272 of *Handbook M-39*.

Rank-and-file letter carriers and union representatives should familiarize themselves with Chapter 2 of *Handbook M-39* and Chapter 9 of *Handbook M-41* to gain a better understanding of the route count and inspection process. These handbooks as well as additional resources are available on the NALC website.

They include the *2018 NALC Guide to Route Inspections* and the NALC Route Protection Program available at [nalc.org/workplace-issues/city-delivery/route-adjustments](http://nalc.org/workplace-issues/city-delivery/route-adjustments). National-level settlements, Step 4 settlements and MOUs can be found in the Materials Reference System at [nalc.org/mrs](http://nalc.org/mrs). Past "Contract Talk" articles pertaining to these issues are available at [nalc.org/workplace-issues/resources/nalc-publications](http://nalc.org/workplace-issues/resources/nalc-publications). An overview of route inspections is also available in the Members Only portal at [nalc.org](http://nalc.org). Log in to Members Only>Members Menu>Shop Steward's Guide>Forms>Route Inspections 2024 Convention Presentation.