



NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

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February 26, 2004

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Subject: National Level Step 4 Grievance
Upside-Down Mail Pieces in DPS Mail Stream

Dear Andrea:

Pursuant to Article 15, Section 4.D. of the parties' National Agreement, the Association submits this National Level Grievance on the following dispute:

Did the Postal Service violate the National Agreement, including but not limited to Articles 4, 5, and 19, and Delivery Point Sequencing (DPS) Implementation Procedures for Rural Routes when it introduced new Wide Field of View (WFOV) technology into the DPS operating environment without notification to the union or an opportunity to bargain. The introduction of WFOV technology into the DPS operating environment has caused upside-down mail pieces to be "mixed in" with DPS mail on Rural Routes. These upside-down mail pieces represent a presentation of mail that was never contemplated, studied, discussed, or agreed upon in the original or any subsequent DPS studies or discussions between the parties. Indeed, upside-down mail pieces did not exist until the introduction of WFOV technology. The presentation of upside-down mail pieces in the DPS mail stream requires additional Rural Carrier work that was heretofore not contemplated, studied, discussed or agreed upon.

Ms. Andrea B. Wilson

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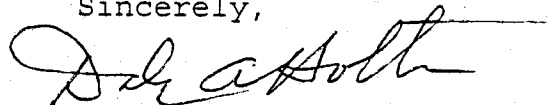
Additionally, the Postal Service has failed and refused to disable the WFOV parameters to reject inverted (upside-down) letters and has similarly failed and refused to instruct its managers and processing facilities to immediately cease and desist the practice of feeding mail upside-down into the automation equipment.

Finally, the Postal Service has failed and refused to make appropriate upward adjustments to the Rural Carrier Evaluated Compensation System in order to account for the additional Rural Carrier work required when handling upside-down mail pieces found in the DPS mail stream. As a consequence, the February-March 2004 Mail Count will not reflect the proper evaluation of rural routes.

The Association's remedial request includes, but is not limited to, a cease and desist order, which shall be communicated immediately to all managers of Postal Service processing facilities. This cease and desist order shall instruct managers and processing facilities to immediately discontinue the practice of running upside-down mail into the DPS mail stream. Absent a cease and desist order or continued violation after issuance of such order, upside-down mail found in the DPS mail stream presented to rural carriers, which would normally be credited as DPS mail, shall be credited in Column A of PS Form 4239 during the February-March 2004 Mail Count and any subsequent Mail Count. Should the DPS mail as impacted by upside-down mail pieces no longer meet the accepted "quality" or "quantity" requirements, the application of the DPS standards will be discontinued and the DPS volume will be reclassified as sector/segment mail (if processing standards are achievable) or raw mail as appropriate, and a base hour change made to adjust the route evaluation.

Please contact my office to determine the earliest date for us to discuss this very important issue.

Sincerely,



Dale A. Holton
President

DAH:mlb

cc: NRLCA National Board