



American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

July 14, 2008

William Burrus
President
(202) 842-4246

Mr. Doug Tulino
Vice President, Labor Relations
U.S. Postal Service
475 L'Enfant Plaza, SW
Washington, DC 20260

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Dear Mr. Tulino:

Pursuant to provisions of the national agreement this is to initiate a Step 4 grievance contesting the employer's interpretation of Article 6.B.4. The employer has informed by letter of July 10, 2008 of the USPS intent to offer voluntary early retirement (VER) to eligible APWU represented employees. The union interprets the 2008 national agreement as governing this early retirement under the provisions of Article 6.B.4 which provides as follows:

Before implementation of reassignment under this Article or, if necessary, layoff and reduction in force of excess employees within the installation, the Employer will..... employees who elect to terminate their employment will receive a lump sum severance payment.....and, if eligible, will be given the early retirement benefits provided by Section 83336(d)(2) of Title 5.

In response to questions posed by employees considering early retirement, the Postal Service interpreted the eligibility criteria as follows:

Question Are all employees who meet the above requirements eligible?

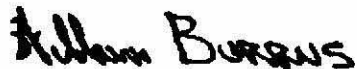
Answer. No, only those employees who are in specific locations where there is a substantial delayering, reorganization, reduction in force, transfer of function, or other workforce restructuring or shaping, and who are likely to be separated or subject to an immediate reduction in the rate of basic pay or are identified as being in positions that are becoming surplus or excess to the agency's future ability to carry out its mission effectively

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In addition, the request to OPM for the Pittsburgh, Pa Remote Encoding (REC) specifically refers to the early out as a "reduction in force" which is consistent with the provisions of Article 6.

The union interprets the negotiated provisions of Article 6 as applying to the circumstances under which the employer is offering early retirement to APWU bargaining unit employees.

Sincerely,

A handwritten signature in black ink that reads "William Burrus". The signature is written in a cursive, slightly slanted style.

William Burrus
President

cc: G Bell

WB:RB/rr
opeiu#2, afl-cio