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American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

Greg Bell, Director
Industrial Relations
1300 L Street, NW
Washington, DC 20005
(202) 842-4273 (Office)
(202) 371-0992 (Fax)

Initiate National Dispute

February 23, 2009

Sent Via Facsimile First Class Mail

Mr. Doug Tulino
Vice President, Labor Relations
US Postal Service, Room 9014
475 L'Enfant Plaza
Washington, DC 20260

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William E. "Bill" Sullivan
Coordinator, Southern Region

Omar M. Gonzalez
Coordinator, Western Region

Re: APWU No.: HQTT20092, Cert. No.: 70072560000321821134

Dear Mr. Tulino:

In accordance with the provisions of Article 15, Section 2 and 4, of the Collective Bargaining Agreement, the American Postal Workers Union is initiating a Step 4 dispute.

The issues and facts involved in this dispute are as follows: The service has employed a new process for preventive maintenance called e-CBM (Electronic Condition Based Maintenance).

It is the position of the APWU that the application of the newly developed e-CBM program is a violation of the Collective Bargaining Agreement, including, but not limited to Articles 7.2, 19 & 38. The program directs other occupational groups, to perform the functions of Maintenance Operations Support (MOS) in the assignment and completion of clerical functions relating to data inputs.

The APWU also disagrees with the USPS contention that this is an Article 4 change, where-as the USPS has not demonstrated any new technology or information relative to establish an Article 4 notification. The USPS has issued at least four separate notifications, dating back to 2004. For example, the notification addressed the concept of Condition Based Maintenance for the AFCS and replaced by the concept of e-CBM, predominately using the same methodology of run-time and/or mail pieces processed for each piece of equipment to determine the severity of the work required on all frequency of tasks assigned.

The difference between the original notifications of Condition Based Maintenance and what evolved into e-CBM is simply the reassignment of duties from the occupational

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responsibility of MOS operations to other occupational groups found with the Maintenance Craft.

The assignment of MOS operations to other position descriptions such as Maintenance Mechanic, Mail Processing Equipment Mechanic or Electronic Technicians is in violation of the CBA, Handbook, EL-201, as well as a violation of Article(s) 7.2 and 38, as it relates assigning employees across occupational group lines.

Ongoing discussions have been continual since the notification of condition Based Maintenance and/or e-CBM concepts beginning with the issuance of MMO-073-04 and subsequent notifications by the USPS, via letter(s), dated approximately June 24, 2004, May 24, 2006, June 8, 2006 and lastly June 23, 2008, authored by Mr. John Dockins, Manager, Contract Administration, USPS-HQ.

Please contact Gregory See, Case officer, to discuss this dispute at a mutually scheduled time.

Sincerely,



Greg Bell
Director
Industrial Relations

GB/RR

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