

July 18, 2003



Mr. William Burrus
President
American Postal Workers Union,
AFL-CIO
1300 L Street, NW
Washington, DC 20005-4128

Dear Bill:

By letter dated February 13 you were notified that the Postal Service proposed to modify the Driver Instructor and Examiner (DIE) position description. The change reflected the removal of PIT training duties from the DIE position description.

This letter will serve as notice that the proposed change has been rescinded.

If you have any questions concerning the foregoing, please contact Jim Caputa of my staff at (202) 268-6170.

Sincerely,

Doug A. Tulino

Manager

Labor Relations Policies and Programs



February 13, 2003

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Mr. William Burrus
President
American Postal Workers
Union, AFL-CIO
1300 L Street, N.W.
Washington, DC 20005-4128

Dear Bill:

The Postal Service proposes to modify the Driver Instructor and Examiner (DIE) position description to comply with current Occupational Safety and Health Administration (OSHA) requirements for providing Powered Industrial Truck (PIT) training. The change reflects the removal of PIT training duties from the DIE position description.

The purpose of the revision and anticipated impact on bargaining unit employees:

- Currently most DIE's do not meet the minimum OSHA qualification standard to train others, as they do not have prior experience as PIT operators on the various types of PIT's.
- We do not anticipate a reduction in DIE positions as result of this change as the time spent on training PIT operators is *deminimus*.

In accordance with Article 19 notification requirements, enclosed are copies of the final draft copy with changes identified, an unmarked final draft copy with the changes incorporated, and documentation from the manager addressing the purpose of change. This change will go into effect no sooner than 60 days from the unions' receipt of notice.

If you have any questions concerning the foregoing, please contact Jim Caputa of my staff at (202) 268-6071.

Sincerely,

Manager

Labor Relations Policies and Programs

Enclosure

FINAL DRAFT COPY OF PROPOSED POWERED INDUSTRIAL TRUCK (PIT) OPERATOR TRAINING

FINAL DRAFT COPY

SUBJECT: Powered Industrial Truck [PIT] Operator Training

This Policy sets forth minimum Postal requirements for the administration and presentation of Powered Industrial Truck (PIT) operator training and to ensure PIT operators receive the quality training needed to properly and safely operate Powered Industrial Trucks. It also ensures the Postal Service is meeting or exceeding Occupational Safety and Health Administration (OSHA) requirements for PIT operator training.

BACKGROUND

OSHA guidance and requirements for conducting PIT operator training are, in part, as follows:

On December 1, 1998, the Occupational Safety and Health Administration (OSHA) published a Standard revising the existing requirements and issued new requirements to improve the training of powered industrial truck operators. The Standard became effective on March 1, 1999. The OSHA revised Standard was implemented by OSHA to reduce the number of injuries and deaths that occur as result of inadequate operator training.

According to the revised Standard, all training and evaluation must be conducted by persons with the necessary knowledge, training, and experience to train powered industrial truck operators and evaluate their competence. According to OSHA, an example of a qualified trainer would be a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has demonstrated the ability to train powered industrial truck operators.

USPS Powered Industrial Truck Operator Training, Administrator Guide, dated June 1999, states, in part, the following:

This course is intended for delivery by a Driving Instructor and Examiner (DIE) and/or job instructor.

The following selection criteria should be used for job instructor selection: Require a minimum of one year current experience as a PIT Operator. Accept only fully qualified operators as job instructors.

USPS Driver Instructor and Examiner Standard Position Description dated 11/2/94, states in part:

Conducts road tests, vehicle familiarization, and assists in classroom training related to the safe operation of motor vehicles and powered industrial equipment.

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Instruct newly assigned drivers and operators in the proper operation of the various types of motor vehicle and powered industrial equipment used in the local postal service.

POLICY

In order to internally align with OSHA revised training requirements and to help ensure Postal Service PIT operators receive the required training, the following Policy establishes minimum requirements for all employees engaged in the training of PIT Operators:

It is good business practice that the Postal Service provides PIT operators with quality training in PIT Safety and Operations.

All Postal PIT operators training and retraining, as required by OSHA, must be conducted by persons with the necessary knowledge, training, and experience in operating PIT.

Person(s) conducting PIT operator training and retraining must have knowledge, training, and experience that demonstrates an understanding of the actual operation of PIT, an understanding of both OSHA and Postal regulations pertaining to PIT, the ability to communicate this knowledge and experience to PIT operators, the knowledge and experience to address site specific issues related to PIT operations, and as a minimum, have skill sets to adequately address training topics below:

- All operating instructions, warnings and precautions for the types of trucks the operator will be authorized to operate;
- Similarities to and differences from the automobile:
- Controls and instrumentation: location, what they do and how they work;
- Steering and maneuvering;
- Visibility (including restrictions due to loading);
- Fork and attachment adaptation, operation and limitations of their utilization;
- Vehicle capacity;
- Vehicle stability;
- Vehicle inspection and maintenance;
- Operating limitations;
- Any other operating instruction, warning or precaution listed in the operator's manual for the type vehicle which the employee is being trained to operate.
- Site specific surface conditions where the vehicle will be operated;
- Composition of probable loads and load stability;
- Load manipulation, stacking, un-stacking;
- Site specific pedestrian traffic;
- Site Specific narrow aisles and other restricted places of operation;

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- Operating in hazardous classified locations;
- Operating the truck on ramps and other sloped surfaces that could affect the stability of the vehicle;
- Other site specific unique or potentially hazardous environmental conditions that exist or may exist in the workplace.

Questions concerning the above requirements must be addressed by management representatives from both the servicing safety and PEDC office.

Person(s) conducting this training and retraining must have successfully completed *Job Instructor Training* (Course 21505-00).

Person(s) conducting the training and retraining must have successfully completed *Powered Industrial Trucks Training*; Course 52503.

GUIDANCE

Adoption of the above Policy necessitated changes to the following Postal documents:

- Driver Instructor and Examiner Standard Position Description
 - Removed all references to powered industrial equipment
- USPS Administrator's Guide for Powered Industrial Trucks Operator Training
 - Removed all references to DIE and job instructor. Inserted and defined qualified instructor.

Revised copies of the above referenced documents are enclosed.

Issuance of this Policy will not require wholesale retraining of Postal PIT Operators. OSHA requires the Postal Service to perform operator performance evaluations on each PIT operator. As part of the adoption and transition to this Policy, it is strongly encouraged the frequency of these evaluations be temporarily advanced. Any additional training will be in the form of refresher training based on evaluations.

As a minimum and according to OSHA, refresher training must be provided when:

- 1. The operator has been observed to operate the truck in an unsafe manner.
- 2. The operator has been involved in an accident or near-miss.
- 3. The operator has received an evaluation that reveals that the operator is not operating the truck safely.
- 4. The operator is assigned to drive a different type of PIT.
- 5. A condition in the workplace changes in a manner that could affect safe operation of the truck.

Questions or comments regarding this memorandum can be directed to XXXXXXXX

PROPOSED CHANGES TO DRIVER INSTRUCTOR AND EXAMINER, PS-06 STANDARD POSITION DESCRIPTION

DRIVER INSTRUCTOR AND EXAMINER, PS - 06

FUNCTIONAL PURPOSE

Conducts road tests, vehicle familiarization, and assists in classroom training related to the safe operation of motor vehicles. Maintains driver related records and assists in the Licensing process.

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DUTIES AND RESPONSIBILITIES

- 1. Conducts the preemployment road test.
- 2. Conducts certification training for road test examiner candidates.
- 3. Provides classroom instruction courses given to newly assigned operators of motor vehicle,
- Instructs newly assigned drivers and operators in the proper operation of the various types of motor vehicle
 used in the local postal service.
- Conducts end-of-training driving tests for newly assigned drivers and operators of motor vehicles to determine whether they are qualified.
- 6. May assist in or personally conduct vision tests.
- 7. Assists in the preparation, issuance, and renewal of Motor Vehicle Operators Identification Cards.
- 8. Conducts driver improvement and refresher training courses for drivers.
- Prepares required reports and maintains records of driver training and tests, accidents, and Sate Driver Awards on PS Form 4582.
- 10. May perform other PEDC related activities in support of primary duties.

SUPERVISION

Supervisor of unit to which assigned.

SELECTION METHOD

Best Qualified selection on en office wide basis regardless of craft.

BARGAINING UNIT

MOTOR VEHICLE

KEY POSITION REFERENCE

KP 0015

(End of Document)

Document Date: 11-02-94

SPD Number: SP-5024

Occupation Code: 5752—O1IX

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