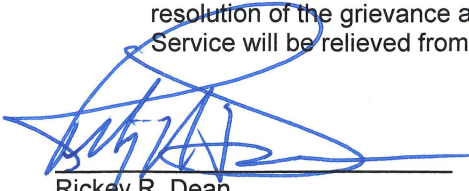


**SETTLEMENT AGREEMENT
BETWEEN THE
UNITED STATES POSTAL SERVICE
AND THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO**

Re: Sales Retention Team (SRT) Remedy Agreement - Case No. Q10C-4Q-C 14011344

In accordance with the terms of this Settlement Agreement, the parties agree to a full and final resolution and remedy of pending disputes involving the Customer Retention Program, formerly known as the Sales Retention Team (SRT) Pilot, Arbitrator Stephen Goldberg's December 8, 2016 Award in the above-referenced national level case, and grievances held pending the outcome of the issues in the above-referenced national level case as follows:

1. In accordance with the Goldberg Award, the Postal Service reaffirms that the work performed by bargaining unit employees at the Customer Retention Program sites is Clerk Craft bargaining unit work.
2. In compliance with the Goldberg Award, the Postal Service posted Customer Retention Agent duty assignments for bid by eligible Clerk Craft employees at all Customer Retention Program sites in March and April of 2017. All sites were attached to the installation (bid cluster) where they were located for purposes of applying the Collective Bargaining Agreement (CBA).
3. To satisfy the monetary remedy, the Postal Service will make payments totaling thirty-six million dollars (\$36,000,000.00) to Clerk Craft employees to be identified by the Union. Ten percent (10%) of this payment will be held by the Postal Service in escrow to be disbursed at a later date and in a manner to be determined by the Union.
 - A. The Postal Service will cooperate to the extent possible to assist the Union in obtaining the information necessary for identification of the Clerk Craft employees entitled to payments in accordance with this agreement. This information will include, but is not limited to, reports of Clerk Craft employees on rolls, at the bid installations associated with each Customer Retention Program site, during the time period from December 17, 2011 (PP1/2012) through April 14, 2017 (PP8/2017).
 - B. The APWU will provide to the Postal Service a list of the clerk craft employees to be paid. The list will include the full name, Employee Identification Number (EIN), duty station, and amount to be paid, for each employee the Union determines is entitled to payment.
4. The parties acknowledge that Local/Area grievances directly related to this national dispute were filed at some of the Customer Retention Program sites. Those grievances may involve other issues which remain outstanding. The parties agree that this settlement agreement satisfies all monetary remedies requested by those local grievances directly related to the national dispute; however, the parties may address the remaining outstanding and non-monetary issues in accordance with the grievance/arbitration procedure at the local level.
5. Except as provided herein, it is understood by the parties that this Agreement is a full and final resolution of the grievance and disputes set forth in national case #Q10C-4Q-C 14011344. The Postal Service will be relieved from any further liability concerning this dispute.


Rickey R. Dean
Manager, Contract Administration
United States Postal Service

Date: 01/12/2018


Lamont Brooks
Assistant Clerk Craft Director
American Postal Workers Union, AFL-CIO

Date: 1/12/2018