

July 29, 2011

Mr. Cliff Guffey
President
American Postal Workers Union
(APWU), AFL-CIO
1300 L Street, NW
Washington DC 20005-4304

Sent by Certified Mail
Tracking #: 7009 3400 0009 0515 7359

Dear Cliff:

This letter is in regard to the jurisdictional craft determination for operation of the Automated Parcel Bundle Sorter (APBS).

The APBS is a retrofit of the current Small Parcel and Bundle Sorter (SPBS) fleet. The retrofit includes the addition of an overhead camera subsystem to support the Bar Code and Optical Character Recognition. With APBS machines, all but one induction station will be modified so that mail pieces can be inducted with no keying required. The exact number of induction stations with keying may vary by location, however. Where no keying is required, the operators face and place mail pieces on the belt for subsequent reading by the Bar Code Reader/Optical Character Reader.

After reviewing the equipment operation, carefully considering the input from the American Postal Workers Union (APWU), AFL-CIO and the National Postal Mail Handlers Union (NPMHU), and applying the principles of RI-399 and the assignment of new or additional work, the Postal Service has determined that the primary craft for performing duties on the APBS are as follows:

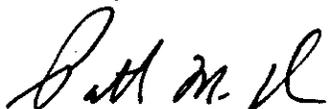
- | | |
|--|--------------|
| 1. Transporting empty equipment. | Mail Handler |
| 2. Obtaining Mail from staging area. | Mail Handler |
| 3. Dumping sacks, pouches or containers. | Mail Handler |
| 4. Culling by type/characteristic and rewrap of bundles. | Mail Handler |
| 5. Facing mail | Clerk |
| 7. Keying | Clerk |
| 8. Inserting labels. | Clerk |
| 9. *Pulling containers. | Mail Handler |
| 10.*Containerizing and transporting. | Mail Handler |

* Clerks will key and/or face mail for no more than 2 hours before rotating to other duties. When not keying, clerks will perform these duties. Personnel assigned to perform these duties in addition to the minimum number required to implement the rotation will be from the primary craft.

The actual number of employees required to perform these duties on the APBS at any time will be determined, applying these determinations, based on operational needs.

If you have any questions or concerns, please contact me at (202) 268-5421.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick M. Devine". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Patrick M. Devine
Acting Manager
Contract Administration (APWU)



American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

July 12, 2011

Rob Strunk
Director
Clerk Division
202-842-4220 (Office)
202-842-8517 (Fax)

Mr. Patrick Devine
Acting Manager, Contract Administration (APWU)
United States Postal Service
475 L'Enfant Plaza SW
Washington, DC 20260-4100

National Executive Board

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Mike Gallagher
Coordinator, Eastern Region

John H. Dirzius
Coordinator, Northeast Region

Princella Vogel
Coordinator, Southern Region

Omar M. Gonzalez
Coordinator, Western Region

Re APBS Position Statement

Dear Mr. Devine :

Thank you for permitting the American Postal Workers Union to participate in the site-visit to view the Automated Parcel and Bundle Sorter (APBS) machine at the Merrifield P&DC on June 13, as well as for this opportunity to provide input regarding the potential impact of the implementation of the APBS machine on craft jurisdictional assignments.

The APWU does not believe that the implementation of APBS sufficiently modifies the Small Parcel and Bundle Sorter (SPBS operation) as to be considered an "operational change." There has been no real change in either the sweeping or dumping functions. Keyers still key a significant percentage of parcels at each induction station. The only real change is that the keyers are now asked to recognize those parcels which are "bar-code readable" and "face" those parcels to be read by the reader instead of keying them. . It should be noted that during our site-visit we observed station #1 keying 100% of the parcels while stations #2 - #6 appeared to be keying a significant percentage (10-30%).

Absent an operational change, in accordance with the terms of the parties' April 16, 1992 MOU, there is no reason for the Employer to make a jurisdictional craft determination for the APBS modification at this time.

Should such a determination be determined to be necessary, the American Postal Workers Union notes that the primary function of the APBS operation continues to be the distribution of parcels and bundled mail. As Arbitrator Zumas correctly pointed out at page 38 of the July 14, 1986 Mail Processor jurisdictional decision [H1M-NA-C 14]:

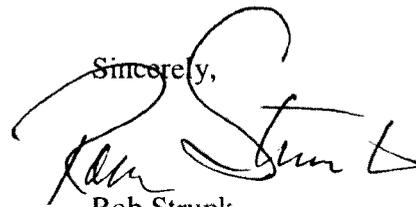
July 12, 2011

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“Given the jurisdictional proprietary right of the Clerks to distribute mail and the fact that the purpose of the OCR/CS and BCS machines is to sort and distribute letter mail, it follows that the Mail Processor, while operating such machinery, is performing a distribution function reserved to the Clerks as the Primary Craft. Loading and sweeping, as part of the Mail Processor’s are permissible under the ‘allied duties’ note relating to the operation of OCR machine distribution.”

Similarly, the American Postal Workers Union proposes that, since the purpose of the APBS is clearly to sort and distribute parcels and bundled mail, it follows that the APBS Operator, while operating such machinery is performing a distribution function reserved for Clerks as the Primary Craft. APWU further proposes that sweeping of the APBS is integral to the distribution function; cannot be efficiently separated; and therefore the sweeping function should be properly awarded to the Clerk Craft to be performed as part of the necessary rotations.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Strunk", with a large, stylized flourish extending from the end of the name.

Rob Strunk
Director, Clerk Division

RS:jb
OPEIU #2
AFL-CIO



June 17, 2011

Mr. Cliff Guffey
President
American Postal Workers
Union (APWU)
1300 L Street NW
Washington, DC 20005-4128

Certified Mail Tracking Number:
7099 3400 0009 0515 9827

Dear Cliff:

As information, the Postal Service would like to thank you for the union's attendance at the site-visit to view the Automated Parcel and Bundle Sorter (APBS) machine at the Merrifield P&DC on June 13. In attendance for the APWU were representatives Tom Maier, Lamont Brooks, and Lyle Krueth. In attendance for the Postal Service were Jacqueline Adona, Allen Mohl, Matt Berrang, and myself.

As discussed previously at various National Dispute Resolution Committee (NDRC) meetings, the Postal Service will be determining whether a jurisdictional craft determination is required for the APBS. If the determination is required, we will also be determining which craft will be the primary craft for operating the various positions on the APBS pursuant to the principles of RI-399.

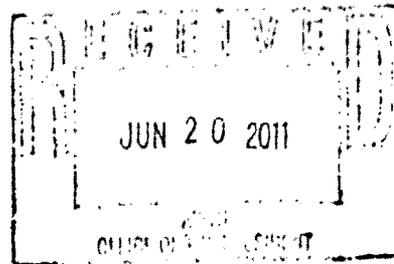
Consequently, we invite your input as to whether such a determination is required and, if so, which craft(s) you believe should properly be assigned, in accordance with the principles of RI-399. We ask that the Union provide its input on APBS staffing as soon as possible, but no later than July 15.

If you have any questions concerning this matter, please do not hesitate to contact me at (202) 288-5421.

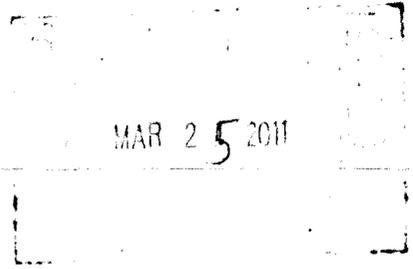
Sincerely,

A handwritten signature in black ink that reads "Patrick M. Devine".

Patrick M. Devine
A/Manager
Contract Administration (APWU)



LABOR RELATIONS



March 24, 2011

Mr. Cliff Guffey
President
American Postal Workers
Union (APWU), AFL-CIO
1300 L Street, NW
Washington, DC 20005-4128

Certified Mail Tracking Number:
7099 3400 0009 0514 8180

Dear Cliff:

This letter serves as follow-up notice to our October 7, 2010, letter to your organization (enclosed) concerning the testing of a modified version of the Small Parcel and Bundle Sorter (SPBS) known as the Automated Parcel and Bundle Sorter (APBS).

Please be advised that the Postal Service will begin nationwide deployment of these modifications in May and June at the following locations:

- Curseen Morris P&DC
- Suburban Maryland P&DC
- Southeastern Pennsylvania P&DC
- Frederick, Maryland P&DF
- Suburban Maryland P&DC
- Lancaster, Pennsylvania P&DC

A full deployment schedule of these modifications has not yet been developed. It will be provided once it is finalized. However, as you were advised previously, these modifications will be made to the 189 SPBS machines.

As indicated previously, because of these modifications, under normal circumstances only one keyer will be necessary on the machine as compared to the four or six used currently on the SPBS. Consequently, as the introduction of the APBS technology may affect the jurisdictional craft determination on the machine, the union's input on craft issues is solicited. Any determination will be made in accordance with the principles of RI-399.

If you have any questions or concerns regarding this pilot, please contact Labor Relations Specialist Patrick Devine at (202) 268-5421.

Sincerely,

A handwritten signature in cursive script that reads "John W. Dockins".

John W. Dockins
Manager
Contract Administration (APWU)

Enclosure

U.S. Postal Service
Washington, DC 20501-0001
202-268-5421

(CA2011-264)



October 7, 2010

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

Certified Mail Tracking Number:
7099 3400 0009 0835 6100

Dear Bill:

Please be advised that the Postal Service will begin pilot-testing this month a modified version of the Small Parcel and Bundle Sorter (SPBS) known as the Automated Parcel and Bundle Sorter (APBS). This test is anticipated to conclude in June 2011.

Aging electronic controls on the SPBS will be replaced with new hardware/software developed for the APBS machine. Other improvements include the installation of barcode and address reading technologies, and the installation of a BCR/OCR reject/return conveyor on the 189 SPBS machines.

The APBS physical configuration of the machines will remain the same with the addition of a return conveyor that will send packages that are not finalized by either the BCR/OCR to the last keying station for manual keying. As a result, under normal circumstances only one keyer will be necessary on the machine as compared to the four or six used currently on the SPBS.

Three of the remaining keying stations will be used to face the package on the conveyor for reading by the BCR/OCR. That is, instead of keying addresses the workers will be facing product at rates of 1,500 pieces per hour compared to the current 700 pieces per hour SPBS keying rate. Be advised that the current average SPBS throughput rate is 2,770 pieces per hour. The baseline APBS throughput rate, using three facers and one keyer, is 4,500 pieces per hour.

The pilot testing of the APBS will take place at the following locations:

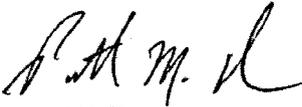
- Detroit P&DC
- Salt Lake City ASF
- San Francisco P&DC
- Des Moines NDC
- Oakland P&DC
- Southern Maine P&DC
- Birmingham P&DC
- San Antonio P&DC
- Northern Virginia P&DC

As the introduction of the APBS technology may affect the jurisdictional craft determination on the machine, the union's input on craft issues is solicited. Any determination will be made in accordance with the principles of RI-399.

Further, I invite you to make arrangements for a site visit to view the machine with Patrick Devine of my staff.

If you have any questions or concerns regarding this pilot, please contact Labor Relations Specialist Patrick Devine at (202) 268-5421.

Sincerely,



for John W. Dockins
Manager
Contract Administration (APWU)