

# American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

March 7, 2018

## Michael O. Foster

Director Motor Vehicle Service Division 202-842-4240(Office) 202-842-8517 (Fax)

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# Sent by Facsimile and First-Class Mail

Rickey Dean, Manager Contract Administration US Postal Service 475 L'Enfant Plaza, SW Washington, DC 20260

Re: First Article Testing Cargo Trucks February 20-22, 2018

Dear Rickey,

On February 20-22, 2018, certified national APWU representatives attended the First Article Testing (FAT) of the USPS purchase of the 18' and 24' Cargo Trucks. Many of the concerns listed below were identified by the APWU during the FAT.

Pursuant to Article 39.3.B. of the Collective Bargaining Agreement (CBA), in the interest of Safety and Health, and other considerations. The APWU submits the following issues for response.

- 1. No cargo light in cargo area of the trucks Safety concern as drivers work during night time hours where visibility is low or minimal. Need a minimum of 2 lights (none as of now) in cargo area for safe loading during low light hrs. (LED preferable).
- 2. Cargo Box Rear area of the box missing two-foot diamond plate. This is a safety concern as drivers may slip and lose balance attempting to load and unload or shift equipment in the cargo box.
- 3. Steps Driver's second step on the 11-ton cab-over truck is not deep enough and creates a potential slipping hazard as the driver attempts to climb in and out of the cab.
- Door Driver's side door has a storage compartment that will be used as a handle and eventually be torn off the door. A recommendation was made to add an extra handle for easy excess.
- 5. Fill floor gap (drain channel) at rear door to prevent equipment wheels from getting stuck. Could result in injuries to employees if left as is (currently ¾ inch gap, shorten to ½ inch gap). Utilimaster rep said they could easily swap out channels to achieve a smaller ½ inch gap.
- 6. Cargo Straps The cargo straps are now connected to the body of the truck. This process makes them dangle and become a trip hazard. A recommendation was made to install "J" hooks to store them when not in use.
- 7. Cab-over model will be a little tight in the cab for our larger drivers.

- 8. Liftgate (Tuck-away) Difficult to operate due to excess weight and possible binding. Liftgate was not within manufacturers specs, 30-50 pounds of pressure to operate. When tested, the operator needed to exert 80-85 pounds of pressure to properly operate the lift gate. In addition, handles used to operate liftgate were not centered and too narrow for operator to slide hand and unfold liftgate. Also, safety release knobs used to prevent roll-away are a tripping hazard due to their location and may get in the way when loading and unloading the truck. Additionally, the safety mechanism used to lock the liftgate in place once tucked under the vehicle is a great concern since it is very cumbersome and creates a possible pinch point when attempting to secure. This particular lift gate, as tested, creates the potential for back, shoulder and wrist injuries. Tuck under lift gate pivot point heavier than 50 lbs. force/stiff to move (will be issue for drivers/ergonomics). Tuck under lift gate handle right side too small to fit hand (remove or find better location). Need to move location of tuck under lift gate safety chain out further so driver can easily access with gloves on. Lift gate safety kick peg/knob seems pretty vulnerable to destruction by mailing equipment.
- 9. Liftgate (Release buttons) has two release buttons on the deck. The two release buttons on deck when deployed allow the end of the gate to extend. This is done so no rolling stock can roll off the deck. It was thought that these buttons will be a possible trip hazard and moreover will be in the way when loading and unloading the vehicle.
- 10. Backup warning system These trucks should have a safety backup warning system installed. An audible alarm when driving in reverse to warn pedestrians and other vehicles would be a good idea. Rear camera to check for objects before backing would be ideal.
- 11. Rear Bumper/ICC Bar The rear bumper is not welded onto the frame of the truck. Instead it is mounted and held on with four number 5-bolts. It was recommended that a stronger number 8-bolt be used as replacement.
- 12. Block Heater outlet/plug The outlet/plug on the test trucks is installed on the passenger side of the vehicle. It was recommended that the outlet/plug be moved and installed on the driver's side to avoid being torn off.
- 13. Wheel Chocks Trucks tested were missing wheel chocks raising a safety concern as PVS drivers also load and unload away from standard docks. Recommended the installation of wheel chocks on all trucks to prevent possible rollaway.
- 14. Gas and Brake pedal The 11-ton cab-over gas and brake pedals are too close together, this could be an issue for drivers with larger feet.
- 15. Hazard Switch -The hazard switch normally red in color, is black instead, making it difficult to locate and therefore use.
- 16. There is a concern that the 122-inch and 149-inch tandem axle position from rear (depending on model), would cause tail swing issues resulting in accidents.

- 17. Please provide the safety program for the familiarization and operation of the (4) cargo trucks.
- 18. Please provide the deployment schedule for the cargo trucks.
- 19. Please provide the flash drive of the pictures taken during the FAT.

Please contact my office at 202-842-4240 with any questions. Your prompt response is appreciated.

Sincerely,

Michael O. Foster, Director Motor Vehicle Service Division



April 23, 2018

Mr. Michael Foster Director Motor Vehicle Service Division American Postal Workers Union, AFL-CIO 1300 L Street, NW Washington, DC 20005-4128 Certified Mail Tracking Number: 7016 1370 0002 3014 3211

Re: First Article Testing Cargo Trucks 18' and 24'

### Dear Mike:

This is in response to your enclosed March 7 letter noting observations regarding the First Article Testing of 18' and 24' cargo trucks which occurred on February 20-22. In your letter, the Union presented sixteen (16) concerns regarding the new trucks. The Union's concerns are repeated below with the Postal Service's response.

1- No Cargo light in the cargo area of the trucks.

Response- Cargo lights will be installed with motion sensors and LED design.

2- Cargo Box- Rear area of the cargo box is missing the two-foot diamond plate.

**Response-** Two feet of diamond plate material will be installed on the rear of the cargo box floor.

3- Steps.

**Response-** This is the standard cab design that meets all Federal Safety requirements. Hand-holds are being considered to determine if better support can be accomplished when drivers step in and out of the cab.

4- Door.

**Response-** This is the standard cab design that meets all Federal Safety requirements. Improved handle designs are being reviewed to determine if better support can be accomplished.

5- Fill floor gap (drain channel) at the rear door.

Response- Rear floor drain gap will be reduced to 1/2 inch.

6- Cargo Straps.

**Response**- Hooks will be installed on the side of cargo walls to hang straps when not in use.

7- Cab-over will be a little tight in the cab for our larger drivers.

**Response-** The distance between steering wheel and the seat was determined to be acceptable during evaluation. The current distance allows for greater than 95% male operation with sufficient clearance.

8- Lift-gate (tuck-away)

Response- The lift-gate tested did not meet acceptable operating goals during the evaluation. After research by the lift-gate manufacturer, it's determined this lift-gate was not operating to specifications in regards to the force required to fold and unfold the platform. This lift-gate is designed to be operated with under 50 pounds of force. The safety chain mounting location will be relocated to allow easier access and installation of the chain. The side mounted handle used to unfold the lift-gate will be relocated to eliminate the need to reach a location too narrow for safe operation. All vehicles will be quality inspected before delivery to meet this requirement.

9- Lift-gate (release button) has two release buttons on the deck.

**Response**- The release buttons on this lift are an integral part of the safety function of this lift-gate and cannot be eliminated. Additionally, these release buttons can easily be replaced if damaged by equipment.

10- Backup warning system.

Response- A back-up warning device will be installed.

11- Rear Bumper / ICC bar.

**Response**- The rear bumper meets the designed requirements of this vehicle.

12- Block Heater outlet/plug.

**Response-** Block heater plugs will be relocated to the driver's door area of the vehicle.

13- Wheel Chocks.

Response- Wheel chocks will be added to each vehicle with a storage location.

14- Gas and Brake pedal.

**Response**- The brake and accelerator pedal meets all National Safety requirements for this vehicle.

15- Hazard Switch.

**Response-** The color of the hazard switch was not noted during the First Article Testing and will not be altered from the original design. The hazard switch meets manufacturer safety specifications.

16- The 122 inch and 149 inch tandem axle position from the rear would cause tail swinging issues.

**Response-** The dimension from the rear axle pivot point to the rearward most point of the vehicle was measured and compared to our current vehicle designs. The rear turning circumference of the replacement vehicles does not exceed current vehicles of the same type.

Additionally, in this letter, you requested the following information:

17- Please provide the safety program for the familiarization and operation cargo trucks.

**Response**- Since the cargo trucks have not been purchased yet, there is no familiarization training set up at this time. You will be provided a copy of the safety program when it becomes available.

18- Please provide the deployment schedule for the cargo trucks

**Response**- The deployment schedule is still in development. You will receive this information when it becomes available.

19- Please provide a flash drive of the pictures taken during the FAT meeting.

**Response-** You will receive copies of the photos as soon as it can be obtained.

If there are any questions, please contact Robert Ocasio of my staff at extension 2057.

Sincerely,

Rickey R. Dean

Manager

Contract Administration (APWU)