



American Postal Workers Union, AFL-CIO

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Memorandum to the Field

To: Resident Officers
Regional Coordinators
National Business Agents
State Presidents

From: Charlie Cash
Industrial Relations Director

Date: November 13, 2025

Re: USPS, APWU, AND NPMHU RI-399 National Dispute
6X-21C-6X-J 23013492, Interpretation of 2018 Update MOU Paragraph 10

In a National RI-399 Award, Arbitrator Margaret Brogan held that the 2018 RI-399 Update MOU did not prohibit the Postal Service from changing craft jurisdiction under a status quo exception while an inventory dispute was pending.

The APWU filed a national RI-399 dispute when the Postal Service jumped ahead of pending inventory disputes to change jurisdiction from clerks to mail handlers based on the "unless" clause in Paragraph 10 (a)(ii) of the 2018 Update MOU. Paragraph 10 (a) says that new inventories would be based on the status quo as of September 1, 2017, "unless those practices were deemed contrary to a National-level craft determination previously issued by the Postal Service..." The APWU dispute was prompted by the Postal Service changing the status quo jurisdiction on the AFSM 100 with AI/ATHS in Peoria, IL and Wichita, KS while inventory disputes over status quo exceptions were pending. The APWU found that the Postal Service waited until a similar inventory dispute in Billings, MT was resolved before changing jurisdiction. After the APWU filed its dispute, premature jurisdiction changes stopped. The APWU took its dispute forward to clarify whether a rule could be read into the 2018 Update MOU for when to change jurisdiction on a Paragraph 10 (a) exception while an inventory dispute is pending.

As an RI-399 case concerning the process for determining clerk and mail handler jurisdiction, the matter was an opportunity to explain RI-399 and the 2018 Update MOU to Arbitrator Brogan. The APWU's dispute did not address staffing and focused on the inventory process for setting craft jurisdiction. Arbitrator Brogan noted that "[m]y jurisdiction here is not to decide which craft gets the work at issue, but to interpret paragraph 10 and other language of the Update MOU..." (Award at 12.) Specifically, Arbitrator Brogan wrote that "[t]he question raised here by the APWU is whether the Postal Service had the right to change the

jurisdiction in these two facilities while the inventory dispute is pending.” (Award at 14.) On that narrow issue, Arbitrator Brogan found that the 2018 Update MOU language, bargaining history, and case law did not require the Postal Service to hold off making jurisdiction changes under a status quo exception in Peoria and Wichita while inventory disputes are pending.

Arbitrator Brogan held that “[t]here is no language [in the 2018 Update MOU] which mandates that the work practices in place on the status quo date must be maintained while an inventory dispute is pending.” (Award at 14.) Having noted that the 2018 Update MOU is incorporated into the unions’ contracts, (Award at 5), Arbitrator Brogan stated that “[t]he Postal Service acted consistent with its management rights reserved in the National contracts...” but that “[t]his is separate from the APWU’s right to raise the inventory dispute over whether the exception applies on the local level, which is still available for the APWU to pursue.” (Award at 14.) The Peoria and Wichita inventory disputes will be handled regionally and locally.

The APWU has secured three sets of dates in 2026 for pending national RI-399 disputes. Contact Assistant Clerk Craft Director Bob Romanowski for more information about RI-399.

In Solidarity,

A handwritten signature in black ink, appearing to read "Charlie Cash", written in a cursive style.

Charlie Cash
Industrial Relations Director