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## NPMHU CHALLENGES BID REVERSIONS AND ABOLISHMENTS



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A recent deluge of bid reversions and job abolishments is being implemented by USPS management across the country, in many cases fueled by the Function 1 Scheduler that the Postal Service uses to determine staffing levels at the large mail processing plants. Postal management has argued that these reversions and/or abolishments are necessary because of the continuing decline in mail volumes: recent figures (for the period from October 1, 2016 through May 31, 2017) indicate a decline of over 6 billion pieces in total mail volume from the same period last year.

But the NPMHU believes that these recent reversions and abolishments are an extreme overreaction to the mail volume figures. When USPS Headquarters directs all Postal Areas to assess their current workforce complements and make necessary adjustments to reflect the decline in mail volume, as has been done recently, the Area Managers not surprisingly require their plants to revert or abolish jobs, whether or not such reductions are justified on a plant-by-plant or case-by-case basis. In other words, the plants require reversions or abolishments in response to the initial overreaction by USPS Headquarters, when plants and their managers should be carefully examining their employment needs.

As for dealing with reversions and abolishments of duty assignments in a local installation, of most importance, each and every duty assignment that is improperly reverted or abolished should be the subject of an individual grievance. The Union holds the burden of proof on each grievance dealing with job reversion and abolishment, and thus the Union should gather and utilize evidence to show that management's decision to eliminate the duty assignment is wrong under Article 12.2D3 (defining a duty assignment as "a set of duties and responsibilities within recognized positions regularly scheduled during specific hours of duty") and Articles 12.3B1, 12.3B2, and 12.3B3 (defining how bids should be posted and awarded in the Mail Handler craft). These violations of the National Agreement are "ongoing," with "escalating liability" and remedies increasing as time passes. Make sure you obtain a copy of the F-1 Scheduler results for your facility. Make sure you use evidence of cross-craft violations or Article 1.6 violations resulting from the elimination of the specific duty assignment. Make sure you argue that the F-1 Scheduler model is flawed. Make sure you link the elimination of a specific duty assignment to the unnecessary and/or improper use of FTR overtime, cross-craft and Article 1.6 violations, use of casuals, and use of MHAs to back-fill the duty assignments that have been reverted or abolished. Demonstrate how mail handler employees are being harmed through the elimination of the specific duty assignment you are grieving, including how mail handler bidding and seniority rights are being undermined and how preferred work hours and preferred non-service days are being ignored. For remedies, affirmatively ask for cease and desist orders, the reposting of any reverted duty assignment, the restoration of the grievant to any abolished duty assignment, and full make-whole monetary remedies, including out of schedule pay. The Union may not prevail on every one of these grievances, but the Postal Service must recognize that their unjustified reversion or abolishment decisions have real world consequences.

The "staffing tool" that is being used to determine complement in each postal installation is called the Function 1 Scheduler. As explained by Postal Managers, the Function 1 Scheduler uses mail volumes, available equipment, allied labor, and volume arrival, among other factors, to help the processing centers to determine their bid alignments and schedules. However, as most Mail Handler representatives already know, the Function 1 Scheduler is far from perfect. Like any other computer program, if you put garbage in, you can expect to get garbage out. The postal managers who met with NPMHU representatives at the National level to discuss these reversions and abolishments readily admitted that the Function 1 Scheduler is far from exact regarding the staffing of allied duties (including mail transportation) and platform operations. Since allied duties and platform operations constitute a substantial portion of mail handler staffing in most mail processing centers, we know that the Function 1 Scheduler's recommended mail handler complement can in no way, shape, or form be considered exact.

The National Office also has been told that results from the Function 1 Scheduler are not necessarily binding on all mail processing centers. However, in order for an individual installation to deviate from the recommended staffing, an exception must be requested from and approved by Postal Headquarters. Even in circumstances where the current installation staffing is below F-1 results, the USPS has stated that the local installation must ask for an exception in order to convert employees to reach the F-1 staffing model.

The National Office therefore has requested from USPS Headquarters the results of all the Function 1 Schedulers for all mail processing centers in the country. We have been assured that the requested information will be provided. Should the USPS refuse to provide the requested documents, the NPMHU will file the necessary charges with the NLRB. All mail handlers should be confident that the Union is not giving up on this issue; nor are we giving in. This is just the start of what may be a long battle to protect the rights of our members, to protect the mailing public, and to protect the Postal Service from itself. This battle must be fought on a reversion by reversion and abolishment by abolishment basis. Each unwarranted bid reversion and abolishment must be challenged and grieved at the installation level.

In addition, the Locals should be asking local management to meet to share the results of their staffing tool and to discuss impacts on mail handler craft employees. Please be certain to participate fully and actively in these meetings, to raise questions, and to disseminate available information to all affected mail handlers. The National Office also should be kept informed of local developments, as they occur.

The National and Regional CAD are fully prepared to assist you with any specific questions that you may have. All members also should stay tuned for further information, both through the mail and on the NPMHU web site.



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