

UPDATE ON RI 399 NATIONAL JURISDICTIONAL ARBITRATIONS

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In this issue, I want to give a brief overview of the National RI-399 cases that have either been recently arbitrated or are scheduled for arbitration.

These cases include:

UPDATE MOU — WHETHER THE POSTAL SERVICE CAN CHANGE STAFFING

A National Level RI-399 arbitration was heard on April 2nd and April 3rd, 2025, with Arbitrator Margaret Brogan. This case was appealed to arbitration by the APWU. Pursuant to the Update MOU, jurisdiction was to be based on the status quo as of September 1, 2017 unless the status quo was contrary to, among other things, a National-level craft determination. One area that fell into this exception was the staffing of AI/ATHS associated with the FSM 100. In certain locations, local management staffed these two functions with Clerks. This action was in direct violation of the national determination on those operations. The USPS agreed that, as a result of the RI-399 Update MOU, the APWU dispute of that determination was withdrawn and that the proper staffing on the AI/ATHS is with the MH craft. The Service recognized that such staffing was contrary to the National level determination, moved the Clerks off those operations and properly replaced them with Mail Handlers.

The APWU filed a national dispute on this action. In that dispute, the AWPU argued that the Postal Service violated RI-399 when it replaced the clerks with Mail Handlers, because such a change cannot occur until all local and regional disputes are adjudicated. The USPS countered that by failing to correct their errors immediately it could cause a major financial award to the Mail Handler craft. The NPMHU position is that this was not a national issue and should have been handled at the Regional level. On November 3rd 2025, Arbitrator Brogan rendered a decision that rejected all of the APWU's contentions. The Arbitrator wrote in her decision "there is nothing in the language of the Update MOU which states that the Postal Service cannot change jurisdiction based upon its good faith determination that a correction was necessary and the work in issue is covered by a National Level Craft Determination." This language should be used in any installation where management violated the exceptions clause when creating or adding language to an inventory.

SIPS/SDUS

On November 14, 2022, the National CAD received the USPS jurisdictional determination on the SIPS and SDUS, determining the work similar to the ADUS. The letter stated:

The SDUS and SIPS are essentially the same equipment as the Automated Delivery Unit Sorter (ADUS). The SDUS are located in Function 4 facilities and are intended to provide processing support at delivery units. The SIPS are located in Function 1 facilities and are intended to provide processing support for mail processing operations. The SDUS and SIPS are both designed to support the automated package processing of machinable parcels/bundles to output zones based on size, weight, and destination of the parcel. The

Postal Service currently has ninety-four operational SOUS machines and seventy-four operational SIPS machines and is planning to deploy fifty-one additional SDUS through February 2023. There are no additional planned SIPS deployments at this time.

The standard configuration of the SDUS and SIPS includes a manual two-feed position sorter with discharge chutes to mail transport equipment (MTE), such as wire containers or pallet boxes. The number of chutes will vary by sorter based on space availability,

machine configuration, and operational need. The SDUS and SIPS can be designed for between 24 to 200 chutes.

Parcels are staged near the induction stations for easy access by the stagers. The stagers remove parcels from the staging area and position the container in place for the facer. The Loader/Facer will then singulate, face, and place the parcels onto the induction belt with the label facing up so the barcode is visible. There is no keying operation associated with the SDUS or SIPS. Both sorters collect weight and dimensions of packages and

includes a Postal Furnished Equipment (PFE) Top-read camera to scan barcodes. The SOUS has the capacity for an optical character recognition (OCR) enhancement. The SIPS is equipped with the OCR. The belt carries packages to the appropriate discharge chute and pushes the package into the associated MTE. Sweepers ensure that MTEs are accurately identified with placards and removed for transfer to the appropriate dispatch area.

The duties performed on the SDUS and SIPS are similar to those performed on the ADUS, Small Parcel Sorting System (SPSS) and Automated Parcel Bundle Sorter (APBS). As with these systems, the SDUS and SIPS has loader stations which are manned by employees. These employees pull, scan, and sort large non-machinable packages, singulate/separate packages, and face/feed packages before they go through the cameras that scan and affect the distribution of the packages not previously pulled, scanned, and sorted as large, non-machinable packages. Taken together, these

functions are integral to the distribution function of the machine. For those facilities where Mail Handlers are present, the primary craft designation for the performance of duties for operation of the SDUS or SIPS is as follows:

1. *Retrieval and staging of packages in swim/staging lanes for access by stagers/facers: Mail Handler Craft
2. *Removing empty equipment containers from staging area: Mail Handler Craft
3. Retrieval of full containers from staging/swim lanes and pull, scan, and sort the large non-machinable packages from each container: Clerk Craft
4. Singulating/separating packages and facing/feeding packages onto induction belt: Clerk Craft
5. *In Function 1 (F1) operations operating a SIPS, sweeping packages (removing full containers and replacing with empty containers), includes sort plan switch out: Mail Handler
6. **In Function 4 (F4) operations operating a SDUS, monitor discharge bins and pull, scan and sort medium

and large no read/no barcode packages into the proper discharge bin, including sort plan switch out: Clerk Craft

7. *Transporting full containers to dispatch area: Mail Handler Craft

*Denotes that in offices where the associated task(s) is an integral part of the distribution function, the entire operation is a function of the primary craft performing the distribution.

**The containers utilized on the SOUS have a higher capacity and do not need to be changed out as frequently in F4, as a F1 plant sortation requires for the operation of the SIPS. The employees monitoring the bins during the run can also take any of the larger no read/no barcode packages from the No Read bin and scan/sort them into the corresponding sort bin. This is integral to the efficient operation of the machine in a delivery unit environment.

In facilities that do not include employees from the Mail Handler Craft, the primary craft designation for the performance of duties for operation of the SDUS is the Clerk Craft.

On December 5th, 2022, The NPMHU disputed both determinations. Those disputes proceeded to National-level arbitration where they were heard in front of Arbitrator Brogan on April 14, and 15, 2026. A decision will be forthcoming.

HOPS

In January of 2023, the NDRC performed a site visit to the Memphis Mail Processing Annex to view the High Output Parcel Sorter (HOPS). The site visit was to determine if a National Craft Jurisdiction of the HOPS was necessary. Following that site visit, the NPMHU presented the NDRC with our reasons that a National Craft Jurisdiction would

benefit the Service, noting that the HOPS is going to be deployed throughout the country into many of the RPDCs and will be an integral part of processing parcels. On August 18th, 2023, the USPS awarded the majority of the work on the HOPS to the MH craft. The lone exception was the "Reject Station," which the Postal Service argued should go to the Clerk craft because it includes facing and keying. Both the NPMHU and the APWU filed disputes on the award, with ours on the Reject Station as the data showed that the keying was de minimis, and there is no need to face as the HOPS using a six-sided scanner. The case will be heard by Arbitrator Brogan in June of 2026.

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