

National Postal Mail Handlers Union

Paul V. Hogrogian
National President

Timothy M. Dwyer
National Secretary-Treasurer

June Harris
*Vice President
Central Region*

John A. Gibson
*Vice President
Eastern Region*

David E. Wilkin
*Vice President
Northeastern Region*

Lawrence B. Sapp
*Vice President
Southern Region*

Don J. Sneesby
*Vice President
Western Region*

November 2, 2017

TO: All Local Union Presidents
National/Regional CAD

FROM: Paul Hogrogian, National President *PVH*
Teresa Harmon, Manager, CAD *TH*

RE: NPMHU Request for Information on Function-1 Scheduler

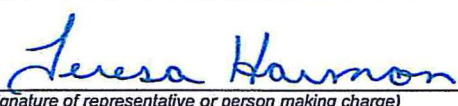
As discussed during the last Semi-Annual Meeting of the Local Unions, the National CAD has been pressing the Postal Service for detailed information and worksheets relevant to the application of the Function-1 Scheduler in any and all mail processing facilities that may be affected by this management tool. Indeed, another meeting on this subject between NPMHU and management representatives is set for later this week.

In the meantime, and to protect against statutory deadlines, the National Office has filed an unfair labor practice charge with the National Labor Relations Board, alleging that the Postal Service has failed to bargain in good faith by providing all of the relevant information requested by the National Union. Attached to this memorandum, for your information, is a copy of that charge.

We will keep you apprised of developments as they occur.

Should you have any questions, please contact the National CAD.

Cc: Tim Dwyer, National Secretary-Treasurer
National Executive Board

(11-10)		UNITED STATES OF AMERICA		DO NOT WRITE IN THIS SPACE	
		NATIONAL LABOR RELATIONS BOARD		Case	Date Filed
		CHARGE AGAINST EMPLOYER			
INSTRUCTIONS:					
File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.					
1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT					
a. Name of Employer United States Postal Service				b. Tel. No. 202-268-2000	
				c. Cell No.	
d. Address (street, city, state, ZIP code) 475 L'Enfant Plaza, SW Washington, DC 20260		e. Employer Representative Douglas Tulino Vice President Labor Relations		f. Fax No.	
				g. e-Mail	
				h. Number of workers employed 450,000	
i. Type of Establishment (factory, mine, wholesaler, etc.) Postal service		j. Identify principal product or service Processing, distribution, and delivery of mail			
k. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are unfair practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.					
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)					
a. Since on or about: May 11, 2017					
b. Name and title of the person requesting information: Teresa Harmon, Manager, Contract Administrator Paul Hogrogian, National President					
c. Name and title of the person to whom the information request was submitted: Patrick Devine, Manager, Labor Relations Douglas Tulino, Vice President, Labor Relations					
d. Method in which request was made (oral or written): Oral and reminder emails					
e. Describe generally (or attach) the requested information that has not been provided: Detailed results and worksheets from the Function-1 Scheduler used by the Postal Service to change employee complement and schedules in each of several hundred mail processing facilities in the United States					
f. Explain the reason for the requested (e.g. contract administration, grievance processing, collective bargaining, etc.): Contract administration, information is relevant to labor-management discussions and potential grievances					
3. Full name of party filing charge (if labor organization, give full name, including local name and number) National Postal Mail Handlers Union, a Division of LIUNA, AFL-CIO					
4a. Address (street and number, city, state, and ZIP code) 1101 Connecticut Avenue, NW Suite 500 Washington, DC 20036				4b. Tel No. 202-833-9095	
				4c. Cell No.	
				4d. Fax No.	
				4e. e-Mail tharmon@npmhu.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)					
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.					Tel No. 202-833-9095
By		Teresa Harmon, Manager, Contract Administration			Cell No. 202-679-1493
(signature of representative or person making charge)		(Print/type name and title or office, if any)			Fax No.
NPMHU 1101 Connecticut Avenue, NW Suite 5000 Washington, DC 20036		10-23-17			e-Mail
(Address)		(date)			tharmon@npmhu.org

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)

PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. §151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information will cause the NLRB to decline to invoke its processes.