

National Postal Mail Handlers Union

David E. Wilkin

Northeastern Region

Vice President

Paul V. Hogrogian National President

John A. Gibson

Vice President

Eastern Region

June Harris

Vice President

Central Region

Michael J. Hora National Secretary-Treasurer

> Lawrence B. Sapp Vice President Southern Region

Don J. Sneesby Vice President Western Region

December 6, 2022

| TO: | All Local Union Presidents National/Regional CAD |
|-------|---|
| FROM: | Paul V. Hogrogian, National President Teresa Harmon, Manager, CAD 77/ Thomas Ruther, CAD Representative and NDRC Member 772 |
| RE: | Union Appeals of USPS Craft Determination for Small Delivery Unit Sorter (SDUS) and Single Induction Parcel Sorter (SIPS) |

We enclose copies of two separate appeals recently filed by the NPMHU to challenge the Postal Service's November14, 2022 determination of craft jurisdiction for employees operating the Small Delivery Unit Sorter (ADUS) and Single Induction Parcel Sorter (SIPS). These machines have been deployed in facilities throughout the country and are continuing to be installed.

As set forth in its November 14, 2022 letter, the Postal Service determined that jurisdictional assignments on the SDUS working at the machine, including singulating/separating and facing/feeding packages and sweeping the mail should be given to the Clerk Craft. In that same letter, the Postal Service claims that the SDUS will only be used in Function 4 operations. The NPMHU is disputing this determination, and also questioning the lack of assignment in Function 1 operations.

In that same letter of November 14, 2022, the Postal Service also determined that jurisdictional assignments on the SIPS should be divided somewhat differently between the Mail Handler Craft and the Clerk Craft. The Postal Service has stated that the SIPS will only be used in Function 1 operations. Mail Handlers have been assigned in Function 1 operations to the retrieval and staging of packages and equipment, and to the sweeping of packages (removal of full containers and replacement with empty containers), including "sort plan switch out," and to the transportation of full containers to dispatch.



These jurisdictional determinations present several questions and concerns for which the NPMHU seeks clarification, and discussions will be continuing for at least 60 days before the National Dispute Resolution Committee and, if necessary, in National arbitration.

Should you have any questions about these appeals or implementation of the SDUS and SIPS in any particular facility, please contact the National CAD.

You may disseminate this memorandum and the attached documents as you deem appropriate.

Cc: Mike Hora, National Secretary-Treasurer National Executive Board



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Shannon Richardson USPS Manager, Contract Administration (APWU) NDRC Representative U.S. Postal Service Headquarters 475 L'Enfant Plaza, SW Washington, DC 20260

June Harris

Vice President

Central Region

Ron Suslak NDRC Representative American Postal Workers Union 1300 L Street, NW Washington DC 20005

Re: Jurisdictional Craft Determination for Small Delivery Unit Sorter (SDUS)

Dear Shannon and Ron:

This document responds to the Postal Service letter dated November 14, 2022, which set forth the Postal Service's determination with regard to jurisdictional assignments for the Small Delivery Unit Sorter (SDUS) under Regional Instruction No. 399.

The NPMHU hereby initiates, in accordance with Paragraph 12 of the Update MOU dated June 2018, a dispute on this determination. That dispute is whether the USPS decision to assign certain work on the SDUS to the clerk craft is a violation of the principles and practices under RI-399. This includes work directly assigned to the clerk craft and work possibly assigned to the clerk craft through the single or double asterisk.

The NPMHU is prepared to discuss this dispute at the next meeting of the NDRC.

Sincerely,

Thomas Ruther

National Headquarters: 815 16th Street, NW, Suite 5100, Washington, D.C. 20006 (202) 833-9095 FAX (202) 833-0008 www.npmhu.org



Cc: Paul Hogrogian, NPMHU National President Michael J. Hora, NPMHU National Secretary-Treasurer Teresa Harmon, Manager, Contract Administration Patrick Devine, USPS Lynn Pallas-Barber, APWU



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Re: Jurisdictional Determination for Small Induction Package Sorter (SIPS)

Dear Shannon and Ron:

This document responds to the Postal Service letter dated November 14, 2022, which set forth the Postal Service's determination with regard to jurisdictional assignments for the Small Induction Package Sorter (SIPS) under Regional Instruction No. 399. The USPS letter mischaracterizes the SIPS, a machine that is exclusively used to Function 1 facilities, as "essentially the same equipment" as the ADUS and the SDUS, going so far as to mistakenly call the SIPS a "unit sorter" comparable to delivery unit machines.

The NPMHU hereby initiates, in accordance with Paragraph 12 of the Update MOU dated June 2018, a dispute on this determination. That dispute is whether the USPS decision to assign certain work on the SIPS to the clerk craft is a violation of the principles and practices under RI-399. This includes work directly assigned to the clerk craft and work possibly assigned to the clerk craft through the single or double asterisk.

The NPMHU is prepared to discuss this dispute at the next meeting of the NDRC.

Sincerely,

Thomas Ruther

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