

SETTLEMENT AGREEMENT

The United States Postal Service (USPS) and the National Association of Letter Carriers, AFL-CIO (NALC), parties to ten (10) separate grievances involving a dispute concerning "simplified address mail" delivery at various locations throughout the postal system, hereby enter into this Settlement Agreement disposing of these grievances. A list setting forth the grievants, location where the dispute arose and the identifying grievance numbers is attached and made part of this Settlement Agreement. In consideration of this Agreement, the NALC agrees to withdraw the referenced grievances from arbitration.


1. The NALC agrees that city letter carriers will carry "simplified address" mail without casing such mail and by placing such mail pieces on the bottom of the appropriate mail bundle, working from both ends of the bundle as they effect delivery of the mail.
2. The USPS agrees to advise all mailers that all pieces of mail presented for mailing under the provisions of 122.412 (DMM) must be tied, so far as practicable, in packages or bundles of fifty (50) as required.
3. The USPS agrees that, for the purpose of aiding carriers unfamiliar with the park and loop route, the number of possible deliveries on each relay of park and loop routes shall be entered on Forms 1564A by the regularly assigned carrier. This information should be updated for each route in conjunction with updates of Forms 1621. Verification of the information will be accomplished during the week of count and inspection.

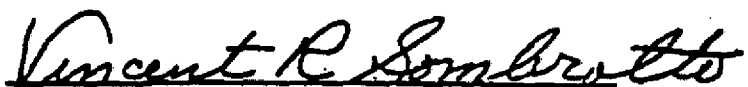
The terms of this settlement agreement will be applied to other grievances on this issue as they are identified. Additionally, necessary instructions on the proper handling of "simplified address" mail will be disseminated to appropriate field managers.

In witness whereof the parties hereby affix their signature below this 17th day of April, 1980.

For the United States
Postal Service

For the National Association
of Letter Carriers, AFL-CIO


William E. Henry, Jr.
General Manager
Grievance Division
Labor Relations Department


Vincent R. Sombrotto
President
National Association of Letter
Carriers, AFL-CIO

Attachment

NALC has entered into a Settlement Agreement with USPS covering ten "Third Bundle" cases involving "simplified address" mail. "Simplified Address Mail" is mail without individual name and address, mailed by a government agency to each stop or possible delivery on a route. The mail is addressed to "Postal Customer", "Residential Customer" or "Business Customer". The Agreement is based upon an earlier settlement of a similar case in New Bedford, Mass. It permits letter carriers to carry "simplified address" mail, without casing the mail, and by placing such pieces on the bottom of the appropriate mail bundle and working from both ends of the bundle. In addition, USPS agrees to advise all mailers that such pieces of mail should be tied, so far as practicable, in bundles of 50.

In order to aid carriers unfamiliar with the route, the number of possible deliveries on each relay shall be entered on Forms 1564A by the regular carrier, and updated.

The cases were settled because a 1978 decision by National Arbitrator Sylvester Garrett (Wallingford, Ct., NB-N-3908) left little doubt that the cases would be lost completely in arbitration. In the Wallingford, CT case, Garrett had rejected NALC's argument that by specifically mentioning third bundle delivery only with reference to motorized routes, the M-39 and M-41 handbooks had permitted the third bundle system exclusively on such routes. In the absence of any prohibition, Garrett permitted the third Bundle system on the dismounted section of a park and loop route, as a "reasonable exercise of management authority under Article III. Even though Garrett described his ruling as "narrow", it was NALC's judgment that the same reasoning would be applied to all "simplified address mail", and so negotiated a settlement which would somewhat reduce