

National Association of **Letter Carriers**.

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Douglas A. Tulino, Vice President Labor Relations United States Postal Service 475 L'Enfant Plaza, SW Washington, DC 20260-4100

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Dear Doug:

Pursuant to Article 15, Section 3.F of the National Agreement, I hereby initiate at the national level, the interpretive dispute between the parties arising from management's claim that it may abolish full-time delivery routes, and substitute new part-time or auxiliary routes consisting of less than eight hours work.

As you know, this dispute has been joined in San Antonio and Corpus Christi, Texas. In both these cities, the Postal Service, following a count and inspection of existing routes, abolished a number of full-time routes and created numerous part-time and auxiliary routes consisting of substantially less than eight hours work. It is the position of the NALC that management's actions are wholly unauthorized by the M-39 Handbook and are in violation of Articles 3, 5, 19, and 41 of the National Agreement. In addition, the realignment of full-time assignments to create new routes consisting of less than eight hours, where there is sufficient work to support the maintenance of eight hour routes, is inconsistent and in conflict with specific provisions of the M-39 Handbook, including sections 242.122, 243.21, 243.22, 243.319c, and 243.614, as well as section 911.2 of the M-41 Handbook.

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Apart from the Handbooks, the requirement that routes be adjusted to an eight hour standard is explicitly set forth in the September, 1992 Memorandum of Understanding, entitled "Resolution of Issues Left Open by Mittenthal Award of July 10, 1992" and the parties' November, 1992 Joint Training Guide, entitled "Building Our Future by Working Together."

A meeting to discuss this dispute at the interpretive step should be scheduled expeditiously. As provided by Article 15.3.F, the local grievances in San Antonio and Corpus Christi should be held in abeyance pending resolution of the above national interpretive dispute.

Sincerely,

William H. Young President

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