

June 3, 2020

Mr. Fredric V. Rolando
President
National Association of Letter
Carriers, AFL-CIO
100 Indiana Avenue, NW
Washington, DC 20001-2144

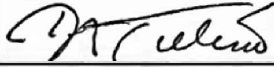
Re: Q16N-4Q-C 19225372
Class Action
Washington, DC 20260-4101

Dear Mr. Rolando:

The issue in this case is whether the testing of Consolidated Casing is permissible under Article 34 or otherwise violates the collective bargaining agreement. The parties agree to the following resolution of this matter, as follows:

1. Management will select 31 of the 62 current case consolidation test sites and those 31 test sites will be returned to their original route structure by July 31, 2020.
2. The remaining 31 test sites will continue through November 27, 2020. The Task Force established by the Memorandum of Understanding, *Re: City Delivery Task Force* will begin analyzing data from the test sites by July 20, 2020 to determine its application to future testing. Absent joint agreement by the parties to either continue the test or to jointly conduct alternative testing in these sites, the test sites will be returned to their original route structure by January 22, 2021.
3. It is agreed that there will be no further expansion of this Case Consolidation Test.
4. When test sites are returned to their original structure, carriers will be given the opportunity to return to their pre-test bid assignments and schedules. However, the number of assignments that exceed the number of assignments created under the test will remain vacant until the routes are evaluated and adjusted in accordance with #5 below. The local parties will jointly work through the transition and contact the appropriate NALC National Business Agent (NBA) and USPS Area Manager, Labor Relations (AMLR), or their designees, for guidance on any unresolved issues. The assignments selected to remain vacant will be auxiliary, no bid, or junior assignments, and no assignments will be eliminated before the routes are evaluated and adjusted in accordance with #5 below.
5. All routes from the test sites will be evaluated and adjusted as necessary beginning in January 2021 by either a joint route evaluation and adjustment process or the traditional route evaluation and adjustment process in accordance with Chapter 2 of Handbook M-39.
6. All data collected from the Case Consolidation Test will be shared and made available to the Task Force established by the Memorandum of Understanding, *Re: City Delivery Task Force* for review and discussion regarding its application to future testing of alternate methods and procedures related to city delivery functions.
7. Grievances related to the Case Consolidation Test pending at any step of the Dispute Resolution Process as of the date of this settlement or future grievances not resolved at Formal Step A will be sent directly to the appropriate NALC NBAs and USPS AMLRs, or their designees. The parties at the area/regional level will jointly determine if such grievances will be closed as a result of this resolution or processed. Additionally, the NBAs and AMLRs (or designees) will oversee the local parties' transition of returning test sites to their original structure.

The above-referenced agreement constitutes a full and complete settlement of the Case Consolidation Test. This agreement is made without prejudice to the parties' position in this or any other matter and may only be cited to enforce its terms.



Doug A. Tulino
Vice President, Labor Relations
U.S. Postal Service



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Date: 6-3-20