

Contract Administration Unit

Paul Barner, Executive Vice President
James D. Henry, Vice President
Christopher Jackson, Director of City Delivery
Manuel L. Peralta Jr., Director of Safety and Health
Dan Toth, Director of Retired Members
Jim Yates, Director of Life Insurance

Route inspections

On May 31, 2024, the Memorandum of Understanding (MOU) Re: Extension of the Technology Integrated Alternate Route Evaluation and Adjustment Process 2022-2023 (TIAREAP) expired. With the expiration of this agreement, in September, we will see the return of traditional route count and inspections. The rules governing the evaluation and adjustment of city delivery routes are found in Chapter 2 of *Handbook M-39, Management of Delivery Services* and Chapter 9 of *Handbook M-41, City Delivery Carriers Duties and Responsibilities*. The provisions contained in these USPS handbooks are enforceable through the grievance procedure via Article 19 of the National Agreement. In addition to these provisions, a number of national-level settlements and MOUs also are applicable and enforceable. Copies of national-level settlements and MOUs pertaining to route inspections and adjustments can be found in NALC's Materials Reference System at nalc.org/mrs.

This article will explain some of the basic principles of route inspections and the Postal Service's responsibilities before and during the mail count. Keep in mind, Chapter 2 of the *M-39* prohibits management from using mail volume or route data from the months of June, July, August and December in the formal route evaluation and adjustment process. Future articles will explain this in detail along with the route inspection and adjustment procedures.

Basic principles

Section 242.122 of the *M-39* establishes the goal of route inspections and adjustments is ensuring that all regular routes are as close to eight hours as possible:

242.122 The proper adjustment of carrier routes means an equitable and feasible division of the work among all of the carrier routes assigned to the office. All regular routes should consist of as nearly 8 hours daily work as possible.

Along the same lines, Section 911.2 of the *M-41* states:

911.2 The count of mail is used to gather and evaluate data to adjust routes fairly and equitably to insure that the workload for each route will be as near as possible to an 8-hour workday for the carrier.

Before the inspection

Prior to determining whether routes need to be inspected, management is required to conduct a unit and route review. The results of these reviews must be shared with the local union and the regular carriers

serving the route as stated in relevant part in Section 211.1 of the *M-39*:

211.1 In order to achieve and maintain an appropriate daily workload for delivery units and routes, management will make at least annual route and unit reviews consisting of an analysis of items listed in section 214, and workhours, volumes, and possible deliveries. Items listed in section 213 may also be utilized in the review. These reviews will be utilized to verify adjustments which have been taken by management, or need to be taken by management, in order to maintain efficient service. The results of the review will be shared with the local NALC President, or designee, and the regular letter carrier(s) serving the route(s) that require adjustment.

If the Postal Service determines the need to conduct a route count and inspection following these reviews, it is required to issue two separate notices.

Under Section 211.2 of the *M-39*, management must determine the week of inspection and notify the local union:

211.2 The period selected for the mail count and route inspections should be determined as far in advance as possible, and the local union should be notified of this schedule. If it is necessary to change the period, the local union should be notified of the revised schedule as far in advance as practicable.

Management is required to post a schedule listing the day each route will be inspected. The day of inspection is the day a manager will count the route's mail and accompany the carrier on the street. This notice must be posted at least five working days prior to the beginning of the inspection in accordance with Section 215.1 of the *M-39*:

215.1 A notice must be posted at the delivery unit in advance of the scheduled mail counts and route inspections, showing the beginning date of the count for each route and the day and date each route is scheduled for inspection. This notice must be posted at least 5 working days before the start of the count period. If a decision is made to inspect on days other than the scheduled date, 1 day's advance notice must be given.

Letter carriers may be required to start early on certain days in order to count mail. Section 215.2 of the *M-39* requires management to post the schedule of starting times:

215.2 Not later than the Wednesday preceding the count week, carrier schedules shall be posted for those routes requiring an earlier starting time to count the mail.

Prior to beginning the mail count, management has an obligation to train letter carriers on the proper procedure for counting mail and completing the PS Form 1838-C, Carrier's Count Mail-Letter Carrier Routes

Worksheet, as each letter carrier will fill out the form during the week of inspection, except for the day of inspection as explained in detail below. This “dry run” training must be conducted within 21 days of the beginning of the count week. Section 217 of the *M-39* outlines the procedures for this training:

217 Dry-Run Count

217.1 A review of the count procedures will be made within 21 days prior to the start of the count and route inspection to teach the carrier how to accurately complete count forms (1838-C and 1838-A) during the period of count and inspection. An actual count of mail or recording of time used will not be kept on the day the dry run is made.

217.2 The sample dry-run count items, forms, and completion instruction must be furnished each carrier concerned in time to allow for completion and review prior to start of the period of count and inspection (see exhibits 217.2 (p. 1, 2, and 3)). Overtime or auxiliary assistance should not be used for the completion of the dry run. Therefore, a lighter volume day should be selected. Use only the appropriate data (EPM/Non-EPM) for the unit being inspected.

217.3 An instruction period should be held following the issuance of the dry-run materials but before the completion of the dry-run exercise.

217.4 The carrier must be furnished a sample list of mail-count items and time-used items. The carrier must enter these items on a dry-run form. A manager must review each completed dry-run form for accuracy, error, and omissions, and they must be discussed and explained to the carrier. When necessary, the manager may require a second completion of the form to assure that the carrier is thoroughly familiar with completing the form to be used.

During the mail count

Section 221.11 of the *M-39* covers the schedule of days to be used for the count. Please note that Saturday is excluded from consideration for routes with abbreviated or no delivery on Saturday. Section 221.11 states:

221.11 The count of mail on all letter delivery routes, regular and auxiliary, must be for 6 consecutive delivery days on one-trip routes and for 5 consecutive delivery days, exclusive of Saturday, on two-trip routes or one-trip routes with abbreviated or no delivery on Saturday. It is not mandatory that mail counts begin on Saturday and continue through Friday so long as they are made on consecutive delivery days.

As stated above, each letter carrier will complete the PS Form 1838-C each day except for the day of inspection; however, the carrier has the right to verify management’s count. Section 221.131 of the *M-39* states in pertinent part:

221.131 The carrier should count and record the mail every day except on the day of inspection when the mail must be counted and recorded by a manager. On one or more days during the count week, each route will be inspected by a manager. When management performs the mail count the carrier serving the route, upon request, may verify the mail count.

This right to verification applies to the entire mail count, as agreed to in the national-level settlement in case number H4N-5T-C42333 dated July 8, 1987 (M-00814), which states in pertinent part:

Normally, a spot verification of the mail volume is adequate to determine the mail count is accurate. However, the parties agree that based on the intent of Section 221.131 of the *M-39 Handbook*, the carrier may, upon request, verify the entire mail count.

Generally, each route will be inspected on one day during the process; however, management may conduct up to three days of inspection. If a route is inspected on more than one day, the manager will complete the form on only one of these days. The parties agreed to this in the MOU Re: Multiple Days of Inspection (M-01777), which states in relevant part:

Local management will, if it determines it necessary when scheduling an inspection to inspect on more than one day, inspect on no more than three days during the week of count and inspection. If local management elects to inspect on two or three days during the week of count and inspection, local management will be responsible for completion of the 1838-C one of the days. The letter carrier will count the mail and complete the 1838-C on the other days of inspection.

The requirement to perform the count and complete the form applies to both the regular and replacement carrier, as stated in Section 221.132 of the *M-39*:

221.132 Replacement carriers assigned to regular, full-, and part-time routes must count the mail and enter the data on the prescribed forms in the same way as the full-time carrier.

Available resources

Union representatives should familiarize themselves with Chapter 2 of the *M-39* and Chapter 9 of the *M-41* to gain a better understanding of the route count and inspection process. These handbooks, as well as additional resources, are available on the NALC website. They include the 2018 *NALC Guide to Route Inspections and the NALC Route Protection Program*, available at nalc.org/workplace-issues/city-delivery/route-adjustments. Past Contract Talk articles pertaining to these issues are available at nalc.org/workplace-issues/resources/nalc-publications.