

## Route inspections, Part 2

July's Contract Talk discussed management's requirements under *Handbook M-41, City Delivery Carriers Duties and Responsibilities* and *Handbook M-39, Management of Delivery Services* before and during the route count. This month's article will explain in greater detail the proper completion of PS Form 1838-C, Carrier's Count Mail-Letter Carrier Routes Worksheet and the inspection of the route.

**Line items**—The letter carrier assigned to the route will complete the PS Form 1838-C each day of the count except for the day of inspection. On the day of inspection, management will count the mail and record the office times. If the route is inspected on multiple days, management will complete the form on one day only. The most important part of completing the PS Form 1838-C is understanding the line items and how they are properly recorded.

Section 222.2 of the *M-39* contains descriptions of each line item, which should be explained during the dry-run training conducted prior to the inspection. Line Items 1 to 13 record the mail volume based on the count. The times associated with casing and pulling mail are not recorded on the form. Line Items 14 to 23 record the time spent performing other office duties. Items with multiple entries should be differentiated by a letter designation, such as 21a, 21b, etc.

For most letter carriers, Line Items 21 to 23 are the most difficult to understand and record properly. Section 922.51 of the *M-41* and Section 222.214 of the *M-39* contain the language pertaining to Lines 21-23 of the PS Form 1838-C. *Handbook M-39*, Section 222.214 (h) explains Line 21 as follows:

(h) Line 21, Recurring Office Work not Covered by Form. (Use Comment section to identify each activity.) Necessary time must be recorded for miscellaneous office activity not included on any of the lines 1 through 20. This would include miscellaneous review or other work that may require the carrier's time relating to handling of undeliverable mail. Describe activity performed and time spent. Each time entry is to be verified and initialed by a manager if it is authorized as a recurring carrier office work activity.

Line 21 entries are described as "recurring" office functions, or the duties letter carriers do every day. For example, obtaining and setting up the mobile delivery device, safety and service talks, retrieving small parcels and rolls (also called SPRs), and discussing daily expectations with the supervisor are all entries which are recorded on Line 21. When you spend time performing a Line 21 function, use the Comments section on the form to describe the function. Regarding Line 22, Section 222.214 (i) states:

(i) Line 22, Waiting for Mail (Office) and All Other Activities Not Performed On a Continuing Basis. Use Comment section

to identify each activity. Time shown on line 22 is deducted from the carrier's total office time. Carriers must be made aware of its purpose and impressed with the fact that a slow-down in office work to avoid waiting for mail will adversely affect the results of the count and/or inspection and may result in a showing of a poor office time record. The proper recording of time waiting for mail, including time waiting for redistributed mail, will pinpoint faulty schedules or the need for attention to distribution during carrier's scheduled office time. Activities that are not part of the carrier's normal routine cannot become a part of the office time. These items are included on this line for deduction purposes.

Line 22 entries are "non-recurring" office functions which do not occur every day. Some of these entries may be things like conversations with the route inspector or a fire drill. Line 22 entries also are documented in the Comments section of the 1838-C. Line 23 is addressed in Section (j), and reads:

(j) Line 23, Counting Mail and Filling Out 1838-C Worksheet. Enter only the time required to count the mail and complete Form 1838-C. The time recorded on line 23 is deducted from the carrier's total office time. Carrier's schedules should be advanced only as needed during count period. On the form used on day of inspection, the notation "counted by route examiner" should be entered on line 23 through columns (e), (f), and (g). If the time recorded by carrier appears unrealistic — inflated or deflated — the matter should be discussed with the carrier and adjusted to a realistic time.

Line 23 entries are exclusive to time spent counting mail and completing the form or verifying the count completed by management on the day of inspection.

It is important that letter carriers accurately record the time associated with each line item when completing the PS Form 1838-C. These times will be used to determine the office time during the route evaluation.

**Inspection Day and conduct of route examiner**—Route evaluation and inspections can be stressful for city letter carriers. Letter carriers are used to working independently and may be uncomfortable having a route examiner watching them all day long. This next section describes handbook requirements governing the conduct of route examiners during the route inspection process.

*M-39* Sections 231 and 232 speak to the conduct of the route examiner. Section 231.5 states:

231.5 The route examiner must inform the carrier that he/she intends to make a fair and reasonable evaluation of the workload on the route and that in order to do so the carrier must perform duties and travel the route in precisely the same manner as he/she does throughout the year. The examiner should impress the carrier with the fact that management is just as anxious and desirous of obtaining an accurate count of mail and inspection of the route as the carrier is, so that a fair and equitable evaluation of the workload on the route may be made.

According to Section 232.1, the route examiner must:

- a. Not set the pace for the carrier, but should maintain a position to observe all delivery points and conditions.
- b. Not suggest or forbid any rest or comfort stops but should make proper notations of them.
- c. Not discuss with the carrier on the day of inspection the mail volume or the evaluation of the route. These matters must be discussed with the carrier at a later date when all data has been reviewed and analyzed.
- d. Make notations on the day of inspection on the appropriate form or separate sheet of paper of all items that need attention, as well as comments on the day of inspection. Also list any comments or suggestions for improving the service on the route, as well as suggestions or comments made by the carrier during the course of the inspection for improvement in delivery and collection service.
- e. Make comments and suggestions clearly, and in sufficient detail for discussion with the carrier and for decision-making purposes. The manager who will actually discuss the results with the carrier must have enough facts and figures to reach a final decision on any necessary adjustments to the route.

The national parties have agreed that there is no standard for performing street delivery; therefore, route examiners should not attempt to set the street pace for letter carriers. This is prohibited by *M-39*, Section 232.1.a and is reinforced by the memorandum of understanding (MOU) M-00304.

M-00304 states in pertinent part:

In keeping with the principle of a fair day's work for a fair day's pay, it is understood that there is no set pace at which a carrier must walk and no street standard for walking.

Letter carriers should perform their street duties exactly as they do every other day. Route examiners should simply observe and take

notes of carriers performing their street duties. Handbook M-41 Section 915 addresses this as follows: In order that a fair and reasonable evaluation may be made by management, carriers must perform their duties and travel their routes in precisely the same manner on inspection day as they do throughout the year.

Route examiners should not prohibit letter carriers from taking comfort stops. Reasonable comfort stops are considered a typical part of a letter carrier's day and, as such, should not be deducted from the recorded street time. USPS and NALC have agreed to this principle in M-00242, which reads:

Management should not deduct reasonable comforts/rest stops from the total street time during route inspections if deduction of the time is contrary to pass local practice. If excessive time for comforts/rest stops is deducted, the matter should be discussed with the carrier.

Letter carriers experiencing route examiner conduct inconsistent with the handbook provisions described in this article should consult with a shop steward or union representative so the situation can be investigated.

As discussed in July, 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](http://nalc.org/workplace-issues/city-delivery/route-adjustments). National-level settlements and memorandums of understanding can be found in the Materials Reference System (MRS) at [nalc.org/mrs](http://nalc.org/mrs). Past Contract Talk articles pertaining to these issues are available at [nalc.org/workplace-issues/resources/nalc-publications](http://nalc.org/workplace-issues/resources/nalc-publications).

## Executive Vice President

# Interpretive disputes (continued)

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The following matters are being reviewed by NALC. Notification will be provided once a determination has been made on whether or not an interpretive issue has been identified.

- **Pre-arbitration settlements—precedent setting:** The issue involves pre-arbitration settlements and whether or not they are precedent setting for the installation in which they occurred, even absent “non-precedent-setting” language. The NALC is reviewing the issue to deter-

mine if an interpretive dispute has been presented.

- **Blue Hampers/S&DC:** The issue involves the use of “blue hampers” at S&DCs. USPS is reviewing the issue to determine if an interpretive dispute has been presented.

As always, NALC will provide updates on any future developments regarding these cases, as well as any additional interpretive disputes that may arise. Please check out the *Activist* article referencing interpretive issues.

Hope you have a great rest of the year.