American Postal Workers Union, AFL-CIO
817 14TH STREET, N. W., WASHINGTON, D. C. 20005

January 9, 1979

Mr. James C. Gildea
Assistant Postmaster General
Labor Relations Department
United States Postal Service
Employee Labor Relations Group
Washington, D. C. 20260

Dear Mr. Gildea:

American Postal Workers Union attended a meeting with representatives of the Postal Service and the Mail Handlers' Union on November 13, 1978. At that meeting you presented us with a document entitled "Post Office - Primary Craft Designation" and a second document entitled "Implementation Criteria". The former was a substantial revision of an earlier paper first presented to us by letter dated August 11, 1978. The latter was a new document.

Your representative stated it was your intention to formally issue these documents on or about November 15, 1978.

We brought to your attention that the unilateral issuance of such documents which purport to modify craft jurisdiction is a violation of the Memorandum of Understanding regarding jurisdiction. Specifically it violates the provision which states:

> "Modification of craft jurisdiction on the national level, including revisions of existing position descriptions and existing local craft assignments of work, will be changed by the Employer upon agreement of those members of the Committee participating in the resolution of the dispute."

If there is no such agreement, the Postal Service is not empowered to alter such existing craft assignments except through the dispute resolution mechanism of the Memorandum of Agreement.

Pursuant to the requirements of the Memorandum of Understanding, APWU hereby informs you that there is a dispute with regard to the following assignments of work to the Mailhandler craft as made by the November 13 documents.

1. We object to the designation of the Mail Handler Craft as the primary craft for any and all functions in Operations 010 and 020.

- The term "make basic local/out of town splits" lacks specificity and can be interpreted to parallel the single piece distribution function of the Clerk Craft.

- Hand cancelling is frequently inseparable from rating. The repairing of damaged letters has historically been a function of the Clerk Craft.

- The required handling of pre-sorted and riffle mail cannot be accomplished by the Clerk Craft if Mail Handler Craft employees are responsible for traying such mail.

Ever since the introduction of Mail Handler Craft employees into the Postal Service, the mail preparation functions have been shared by both the Mail Handler and Clerk Crafts. The mail preparation function, except in the largest offices, does not provide full-time employment in either Craft and must be a joint function.

2. We object to the absence of a specific notation that allied labor in Operations 087-080 is performed by clerks because of the rotation system. Your present notation states only that such work is now performed by clerks. Your own handbooks recognize that this function is to be performed by Clerk Craft employees.

3. We obejct to the assignment of manual distribution of parcel post, without scheme knowledge, to the Mail Handler Craft in Operation 100. The position description of Mail Handlers does not provide for such regular assignment and there is no precedent for this substantive attack on work historically assigned to the Clerk Craft. On the contrary, the Garrett award relating to the three west coast cases expressly left such work in the Clerk Craft at those locations.

4. We object to the assignment of readdressing parcels and recordkeeping to the Mail Handler Craft in Operation 109, a function requiring skills of the Clerk Craft. We further object to the assignment of routine daily maintenance in Operation 109 to the Mail Handler Craft since this function is an integral portion of the Maintenance Craft.

5. We object to the assignment of dispatching containers of mail processed in Operation 160 since the dispatch of such mail frequently requires scheme knowledge.

6. We object to the assignment of any sweeping in Operations 168-169 to the Mail Handler Craft since this work is an incidental function integral to box service Clerk Craft duties.

7. We object to the designation of the Mail Handler Craft as the primary craft for sorting of non-machineable outside parcels at the BMC's.

8. We also have numerous questions regarding inconsistent terminology in your submission and have other questions regarding changes in terminology which invite disputes in individual post offices.

APWU requests that a meeting of the Committee on jurisdiction be convened at once to consider these disputes in light of the six relevant factors set forth in the Memorandum of Understanding.

It is not our intention to consume the entire 180 days provided by the Memorandum of Understanding in discussion of these matters. On the contrary, unless a complete resolution of these disputes is arrived at in one meeting, it is our intention to refer any remaining disputes to arbitration at once.

I await your early response.

Sincerely yours,

Emmet Andrews

Emmet Andrews
General President

EA/dj/hw

cc: Jules Bernstein
Lonnie Johnson