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

September 28, 1979

Mr. James Gildea
Assistant Postmaster General
Labor Relations Division
U.S. Postal Service
Washington, D.C.

Dear Mr. Gildea:

This is in reply to your letter of September 12, 1979 replying to Mr. Newman's letter of August 1 in which he requested certain information for use in the coming arbitration regarding jurisdiction.

At the conclusion of your letter, you noted that APWU had not met with USPS representatives to frame issues for the arbitration as suggested in my letter of April 10 and Mr. Mitchell's reply of April 18. The considerable amount of discussion already held on the subject seems, in retrospect, to make that step somewhat superfluous, but I have instructed Mr. Jordan to arrange to meet with Mr. Poole to identify such issues.

To be specific, APWU believes the issues should include the following although it is possible that others may surface in subsequent discussions:

1. Whether USPS violated the National Agreement by the procedures used to promulgate Regional Instruction No. 399.

2. What is the correct resolution of the following disputes over jurisdiction:

(1) Operation 010 - We dispute the award of any portion of this operation to the mail handler craft as the primary craft with the exception of letter cancellation on facer cancellers;

(2) Operation 020 - This Union disputes the assignment of any portion of this operation to the mailhandler craft as the primary craft.

(3) 050/055 - We dispute the assignment of any work in the priority mail function to mail handlers as the primary craft.

(4) 100 - We dispute the award of the distribution of all parcel post without scheme knowledge to the mail handlers.

(5) Operation 105 - We dispute the assignment of dispatching in Item No. 5 to the Mailhandler craft. We also challenge the award of inserting labels to the mail handler craft.

(6) Operation 109 - We dispute the readdressing of parcels and record keeping other than an actual count of parcels rewrapped as a primary function of the mail handler craft. We also challenge the insertion of the note at the bottom of the Operation 109 as we claim all distribution work.

(7) Operation 168/169 - We dispute the assignment of mail handlers to the box section in any post office.

(8) Operation 180/189 - We dispute the assignment the labeling of sacks and the dispatching of pouches to the mail handler craft.

(9) Operation 200 - We dispute the assignment of labeling of sacks and the distribution of pouches as a primary function of the mail handler craft.

(10) 210/239 - We dispute the assignment of the manual sorting of outside parcels as a primary function of the mail handler craft, even though such a distribution is nonscheme.

(11) We challenge the award of the loading of ledges and sweeping cases as a primary function of the mail handler craft wherever such an award is made throughout the several pages of Regional Instruction No. 399.

(12) In the Bulk Mail Centers we dispute the award of the missent/malfunction chutes as a primary function of the mail handler craft.

13. We also dispute the assignment of non-machineable outside parcel sortation to the mail handler craft as a primary function.

In view of the foregoing, it is apparent that the information requested in my August 1, 1979 letter is highly relevant to the issues to be presented in the arbitration. Accordingly, I renew my request for that information and suggest that it is important that such information be forwarded promptly since the available time for us to make use of it is growing short.

Moreover, we request the following additional information:

1. The number of offices having mail handlers on the rolls as of November 15, 1978 (or the end of the accounting period immediately thereafter) and the same information for the most recent accounting period.

2. The actual number of mailhandlers and clerical employees assigned to each of the operations mentioned above over which APWU has indicated a dispute exists.

Such information should be for any single weekday in the near future and should cover a minimum of a two-hour period on the date chosen at a time of day when the individual operation is running at peak capacity. We request such information for the following offices:

Phoenix	Houston
Flushing, New York	Denver
Atlanta	Milwaukee
Harrisburg, PA	Hartford, CT
St. Louis	Pittsburg, PA

We should have such information in our possession on or before October 15, 1979 in order to adequately prepare for the arbitration.

Sincerely yours,

Emmet Andrews
General President

EA:mr
opeiu #2
afl-cio

bcc: Messrs. Newman
Morgen
Jordan
Wolff