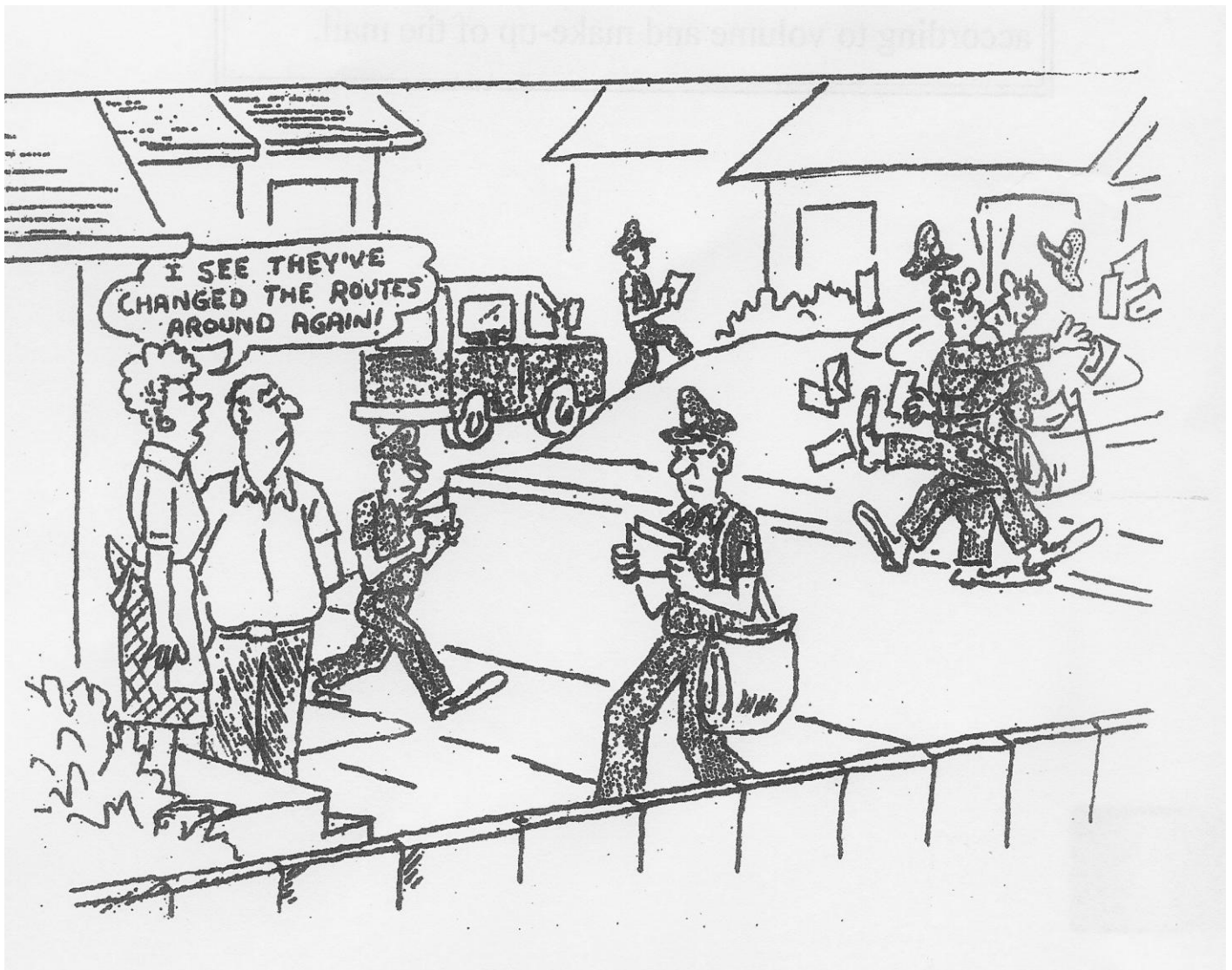


# ROUTE COUNT AND INSPECTION

## An Overview

*(The Route You Save Might Be Your Own.)*

Prepared for you by Gloria Moore



Keep copies of your 1838s and 1840s. They will be invaluable for you and your steward at a later date if you receive any performance based discipline. It will show your performance varies according to volume and make-up of the mail.



# Things to Remember Before, During and After Your Route Count & Inspection

a.k.a. “The route you save may be your own.”

(If you don't know your rights, you don't have any.)

Prepared for you by: Gloria Moore

## PRIOR TO ROUTE COUNT & INSPECTION:

1. Five working days before the start of the count, management must post a notice giving the schedule of the count week and the day and date of inspection (M-39 Section 215.1, M-41 Section 913).
2. You must be given one day advance notice **if management changes the day of inspection** to a different date (M-39 Section 215.1, M-41 Section 913). Contact your shop steward to report a potential grievance if management changes your date of inspection without the proper notice, or if more than one day of inspection is scheduled.
3. Before a route examination begins, management **must** have completed an annual route and unit review. The results of this review **must be shared with you prior to proceeding** with a mail count and inspection (M-39 Section 211.1). The review itself consists of identifying problems and correcting unsatisfactory conditions such as inadequate case labels, carrier case equipment, and the amount of missent or misthrown mail distributed to the route.
4. This review period is also your opportunity to discuss any unsatisfactory conditions with your manager. If the results of this review were not shared with you prior to the mail count and inspection, contact your shop steward to report a potential grievance.
5. Usually you will be scheduled to report to work earlier during the week of the count, because counting the mail and filling out the Form 1838-C Worksheet take extra time. Not later than the Wednesday preceding the count week, **carrier schedules shall be posted** for those routes requiring an earlier start time to count the mail (M-39 Section 215.2, M-41 Section 921.23).
6. Management also must give you a chance to practice filling out PS Form 1838-C, *Carrier's Count Mail-Letter Carrier Routes Worksheet*. This practice session is called a **dry run** (M-39 Section 217, M-41 Section 917). The dry run must be conducted **within 21 days prior to the start** of the count and route inspection. Management review: The supervisor **must** review your form for accuracy, error or omission and then discuss any problems with you. If necessary the supervisor may require you to complete a second form.
7. On the day of inspection, the route examiner will conduct the mail count and fill out the 1838-C Worksheet. Exercise your right to **verify the inspector's count**. This is an important right and you are strongly encouraged to insist that you be allowed to verify the count. This includes all DPS, S999 (residual mail), and any machine counted mail as well.

8. If you are scheduled for **more than one day of inspection**, contact your steward to report a potential grievance.
9. **Annual Leave During Count and Inspection**. Management must block out the dates of the route count and inspection from the annual leave book **prior to** it being signed by the carriers. M-01105 states:
- 1) All advance commitments for granting annual leave must be honored except in serious emergency situations.
  - 2) Management may block out vacation time in order to perform route inspections, provided that the dates in question are blocked out **prior to vacation selection**.
10. **Overtime During Count and Inspection**. The overtime provisions of Article 8 remain in full force and effect during the week of count and inspection except that:
- 1) On the day during the week of inspection when you are accompanied by a route examiner, management may require you, even if you are not on the overtime desired list or work assignment list, to work overtime on your own route in order to allow for completion of the inspection.
  - 2) On the other days during the week of inspection when you count the mail, management may require you to work overtime on your own route **for the amount of time used to count the mail** (M-39 Section 221.137).
11. **Operational Changes** affecting an entire unit should be effected no later than the dry run. They should remain in effect through the week of count and inspection and thereafter until conditions require further modifications. During the week of count and inspection there should be no changes to normal distribution procedures or clerical schedules. The normal cutoff time for distribution should be observed (M-39 Section 221.133).
12. **All Mail Must Be Delivered**. All mail distributed to your route up to the normal established cutoff time **must be delivered every day of the count week**. In addition, there must be no accumulation of curtailed mail on the day proceeding the count, and no mail may be curtailed on the last day of the count (M-39 Sections 221.133, 221.134 & 221.136, M-41 Sections 921.11 & 921.13).
13. **Auxiliary Assistance During Count and Inspection**. You're better off *not* getting auxiliary assistance during the count and inspection. If you do, make a note and **get a copy of the 3996**. Management frequently leaves this time off of the final paperwork, thereby cheating you out of that time.
14. **Complete Vehicle Inspection**: You should perform every point on the expanded vehicle inspection safety checklist **every day**. The checklist is included in this packet and also appears in the M-41 as Exhibit 832.1. You are allowed to use the "buddy system" in a vehicle inspection where necessary – for example, to check the brake lights. (**Note #24: Gas gauge requires 30 seconds for "warm up"**.)
15. **Letters vs. Flats**. To receive full credit under the "18 and 8" standard, you must be careful to count letter mail and flat mail properly. To do so you must know the definition of "letter size mail," as opposed to "other size mail."

Letter size mail is defined as mail that can be cased into the normal evenly spaced 6-shelf letter separation without bending or folding (M-41 Section 922.41). Other size mail, sometimes referred to as "flats," is all

mail that does not fit the definition of letter size mail, except parcels. **Mail is counted as “other size” even if it is sorted into the letter case.** Similarly, items such as TV Guide, Readers Digest, newspapers, rolls, flats, magazines, catalogs, booklets containing 24 or more pages, small parcels or coupon booklets are counted as “other size” mail regardless of how they are sorted (M-41 Section 922.42). **Do not ‘pad’ your count!** That will show you doing more in less time – you want to show where it takes you longer to do less.

16. **Definition of a parcel.** ” A “parcel” is defined as a First or Fourth-class package over 2 pounds in weight and/or larger than a shoebox (M-41 Glossary). **Do not ‘pad’ your count** during the count and inspection. This count will become your daily ‘averaged reference volume’ and you want that volume to be low.

17. If you case slower than the 18 & 8 standard, management will evaluate your office time using 18 & 8. However, the M-39 provides for an exception for carriers who have served continuously for more than **25 years or are over 55 years of age.** These carriers **may** be allowed an office time, in the evaluation of their routes, that is over standard (M-39 Section 242.214).

18. **Breaks:** The two breaks are mandatory, and a national-level arbitrator has ruled that management is required to ensure that employees stop working during an office break (C-08555).

19. **Personal Needs.** You **do not record personal needs time** on the 1838-C. The M-39 provides for an automatic allowance of 5 minutes for personal needs, obtaining hat and coat from wall racks before leaving office, visiting swing room to obtain rain gear from locker, etc. If you have a two-trip route, an additional two minutes is allowed on the second trip. This 5 minutes is computed into your standard time determination whether you take any time or not. **Please note that if you do not use any personal time in the office, and your evaluation shows you are under standard, your route adjustment will not include any time for personal needs,** because management will adjust the office time component of your route to your actual average time, not your standard time (M-41 Section 922.51g). **If you use more than the automatic 5 minutes, list that time as a Line 21 item.**

20. Make sure on the day the inspector completes the Form 1838-C Worksheet that the actual time used by the examiner withdrawing mail is recorded by the examiner as a **Line 15 or 21 function.**

21. **Verifying and Signing for Accountables.** It is important to take the time to properly verify and sign for all accountable items, because you are responsible for accounting for this mail. You may take time under **Line 14** to fill out the name **or** address on residential accountables for identification purposes on the Form 3849, to case the Form as a reminder, and to verify and sign for all accountables. **Form 3849 for business accountables may be filled out in its entirety.** **Do not ‘pad’ your count!** This count will become your ‘averaged reference volume’ of accountables and you want it to be low.

22. **Replenishing Forms.** Letter carriers are required to check the forms pouch several times each week to be sure all necessary forms are there when needed (See Footnote 5 (M-00605), M-41 Section 143).

23. **Verifying Hold Mail.** M-41 Section 241.312 requires letter carriers to verify hold mail held at the carrier case **once each week** to ensure that no mail designated by the mailer is kept beyond the retention period. Such mail is endorsed “temporarily away.” **This is counted as a manual carrier mark-up.**

24. **Checking ‘Pink Cards’ (3982’s).** Check the Pink Cards after your non-scheduled day to see if any were added in your absence.

25. **Sorting Mail Into Buckets.** **Do Not** sort mail directly into buckets. Case *all* mail into separations on the case. When that separation becomes full, pull it and rubber band it and place it aside to be collated with all of the mail for that stop. (M-39, 116.841 When a carrier is required to segment mail for a high volume delivery point, consider locating a separation large enough to accommodate the mail volume. This separation may be located in the lower, easy to reach, portion of the case, not necessarily in the sequence of delivery. The label under the separation must clearly indicate the address and/or ZIP+4 code of the separation. 116.842 Restrictions. **Carriers must not distribute individual letters or flats directly to sacks or other containers.**)
26. **Cutting/Removing Bands/Straps.** List the time used for cutting/removing bands/straps on Line 21, even though management says to list it on Line 15. This way they cannot adjust Line 15 down to standard time – they must show all of the time used. If you're not allowed to cut/remove bands/straps on certain mailings on office time, each one of those bundles taken to the street is counted as a parcel.
27. **Special Attention Mail.** Hold mail to the side that requires special attention; i.e., yellow stickers, mail requiring a bull's eye, barcodes that need to be blacked out, etc. These are Line 21 items.
28. **Retrieving SPRs from Parcel Gondola.** SPRs may be cased, put in a bucket or lined up in delivery order in a tray. This is listed on Line 21. **Make sure and not count them as parcels.** They are counted and listed under 'Other Size Mail' on the 1838-C.
29. **Clean-Up Area After Pull Down.** Pick up any straps, rubber bands and any other miscellaneous items that may have fallen onto the floor around your case area. Return empty equipment to designated areas.
30. **Last Hot Case Mail Pull.** Make sure the count of the mail from your last hot case pull is added to your 1838-C.

## **DURING ROUTE COUNT AND INSPECTION**

31. **Examiner's Conduct:** You should be aware that route examiners must adhere to certain regulations governing their conduct. The M-39 Handbook states that the route examiner must not set the pace for you, nor should he or she forbid any rest or comfort stops. The examiner is not allowed to discuss mail volume or any evaluations of the route with you. Contact your shop steward to report a potential grievance if you feel the route examiner's conduct goes beyond what is allowed.
32. **Fingering Mail.** Do not finger mail when walking up or down steps or curbs, when crossing streets, or at any time it would create a safety hazard to yourself or to the public (M-41 Section 133.2). You must not finger mail while driving or hold mail in your hands while the vehicle is in motion. If the route examiner asks you to finger mail in a manner not provided for above, contact your steward to report a potential grievance.
33. **Crossing Lawns.** You should cross lawns to deliver mail only if there is, in your opinion, no safety hazard, such as a dog, slippery surface, snow, uneven terrain, or unusual obstacles, and only if there is no objection from the patron (National Agreement Article 41.3.N). During the route inspection, the examiner may not instruct you to cross lawns that you do not cross throughout the year.

34. **Carrying Mail on Arm.** Park & Loop deliveries should *never* be carried on your arm (emphasis added). This practice causes injury to your rotator cuff and elbows. Learn to **deliver all mail from a pouch.**
35. **Curblin/NDCBU Deliveries.** At each box, put gear selector in park (if on unlevel ground) or in neutral (if on level ground), with foot firmly on brake (M-0341, M-0972, M-0994).
36. **Make One Hand Motion to Deliver Mail.** Have all mail ready so only one hand movement is required for placing mail in receptacle. Take time to properly close mail receptacle.
37. **Plant Both Feet.** Park and Loop carriers should get in the habit of ‘planting both feet’ prior to putting mail in the receptacle. This will keep you from ‘spinning on one foot’ while making deliveries and will make delivery safer.
38. **Securing Vehicle.** Never leave your vehicle without first curbing the wheels, setting the brake, rolling up both windows, removing the keys and locking it. Remember, the vehicle is out of sight when you turn your back to it and walk away, even when just delivering a parcel or accountable.
39. **Move your vehicle only when you are absolutely certain that it is safe to do so,** especially if children may be nearby. If necessary, get out, circle your vehicle, and check underneath it to make sure (EL-814).
40. **Pulling Away From Curb.** Use your turn signal before turning, changing lanes, or pulling to or away from the curb or shoulder of the road, such as when a car or trash is blocking your way (EL-814).
41. **Door Must be Closed.** The driver door may be open when servicing curblin boxes, but must be closed when entering intersections and crossing alleyways.
42. **Leaving Notice.** Never leave mail or parcels on the porch. If the customer is not home to accept the mail leave a notice.
43. **Gang boxes/NDCBUs/Collections.** When collecting mail from a street box or a mail chute receiving box, or when delivering mail to apartment house boxes or neighborhood delivery and collection box units (NDCBUs) that are equipped with an arrow lock, **remove the key from the lock to avoid personal injury or damage to your clothing or keys.** Keep the chain for your mailbox keys securely fastened to your belt loop and **place the keys and chain in your pocket** when you are not using them. Dangling, swinging keys and chains can be dangerous (EL-814).
44. **Never stand in the street** when loading or emptying mailboxes. Do not place mail in or collect mail from any boxes that require you to stand in the street. Use Form 1767 to report such boxes to your supervisor so that corrective action can be taken (EL-814).
45. **Parking Lots.** Park in designated parking spaces only. **Do not cut through parking lots.** Use designated traffic lanes only (EL-814).
46. **Scrunch Trays.** Do not use Scrunch Trays to separate UAA mail on the street. You must only make two (2) separations on the street – raw mail and all other mail. Separating UAA mail is an office function (M-41, 242.63, M-39, Section 361).

47. **Examiner Opening Doors/Setting Pace.** Do not allow the examiner to perform any of your duties, nor walk in front of you – they are trying to set your pace.
48. **Walk Pace.** There is no standard or minimum street pace that a carrier is required to maintain. Do not allow yourself to be intimidated into speeding up on the day of inspection. The examiner may not set the pace for you and should maintain a position to **observe only.**
49. **Breaks.** As mentioned earlier, carriers are entitled to either one break in the office and one break on the street or two breaks on street time. Do not let the route examiner intimidate you, or coerce you into skipping or reducing your break, and if they attempt to do so contact your shop steward to report a potential grievance.
50. **Lunch.** You should take your full 30-minute lunch at one of the authorized locations recorded on the Form 1564-A in your route book. When leaving the route for lunch, lock the satchel containing undelivered registered and COD mail in a designated relay box or the vehicle. Make a simple record of the registered, COD, and other more-than-ordinary-value items that are left. When returning from lunch, check to ensure that no pieces are missing (M-41 Section 131.13). Do not let the route examiner intimidate you, or coerce you into skipping or reducing your lunch, and if they attempt to do so contact your shop steward to report a potential grievance.
51. **Comfort stops.** In addition to your lunch period and break periods, you may take any comfort stops reasonably necessary during the course of performing your street duties. Reasonable comfort stops will not be deducted from your actual time (M-39 Section 242.341). In fact, the examiner may not suggest or forbid any rest or comfort stops. Do not let the route examiner intimidate you, or coerce you into skipping a comfort stop, and if they attempt to do so contact your shop steward to report a potential grievance.
52. **Hazardous Conditions.** You are not required to risk personal injury from icy steps, broken or rotten steps or porches, protruding nails or sharp edges on mailboxes, or similar hazardous conditions, Use Form 1767, Report of Hazard, Unsafe Condition, or Practice, to report any of these problems to your supervisor.
52. **Return Your Equipment/Process Undelivered Mail.** Take your empty equipment (depending on local practice) to the designated locations. Place undelivered mail on case and **complete Form 1571.** **Note: Make sure you obtain a management initialed copy of Form 1571 (M-39 Section 111.2.j).**
53. **Count all of your returned mail.** Recording this count on the 1838-C Worksheet immediately after completing the Form 1571. An accurate count and classification of all undelivered mail in the afternoon will result in a “pull down” credit the next day for your CFS and other cased mail.
54. **Personal Time Prior to Clocking Out.** On your way to the time clock you visit the restroom, wash-up and return items to your locker. There is no actual time entry for this personal time.

~ Remember ~ The steward is not your mama.  
Getting a fair and reasonable count and having your route  
adjusted to as close to 8.0 hours as possible is *your* responsibility.

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## What To Do With Yellow Stickers, Inquiries, & Bulls Eye Mail

Everyone gets No Record Mail with yellow stickers on it. So you pull off the sticker, and process the mail piece in some way. How do you get your time for this? Here are some tips:

1. If you have to check the 3982 (pink card) to see if there really is a COA on this customer and the CFS unit messed up, then it is a COA search. Count it as a COA processed - 2 minutes credit. You also get 2 minutes for any search for a change of address (inquiry) – such as for the Attorney General's Office. You will note how many COA's and INQ's you have on the 1838-C next to rows 9, 10 or 12.
2. If you have to bulls eye the piece (circle the right thing for them to key in), then it is a carrier markup and counted as such on the 1838-C under 'Carrier Marked Up' next to ¢ - four per minute credit.
3. If it is one of the following, then it goes into a bundle that is marked on top:
  - (1) Undeliverable As Addressed,
  - (2) Attempted Not Known,
  - (3) No Such Number,
  - (4) Insufficient Address, and
  - (5) Undeliverable Bulk Business Mail (UBBM).

The number of pieces in each of these bundles is counted and recorded on the 1838-C under 'Carrier Marked Up' column as ANK, NSN, etc.

Each of these bundles will get credit for a fourth of a minute.

4. If it is one of the following, then you will endorse each piece and receive credits of four pieces a minute.
  - (1) Deceased,
  - (2) Temporarily Away (retention period for hold mail has expired),
  - (3) Refused,
  - (4) No Mail Receptacle, or
  - (5) Vacant (Occupant Mail Only endorsed address correction requested, return postage guaranteed, or forwarding and return postage guaranteed).

These are recorded on the 1838-C under 'Carrier Marked Up' column as carrier mark ups, ¢ , and you get four per minute credit and ten per minute to separate them into the throwback case.

**COMPLETE VEHICLE INSPECTION:** You should perform every point on the expanded vehicle inspection safety checklist. The checklist appears in the M-41 as Exhibit 832.1. You are allowed to use the “buddy system” in a vehicle inspection where necessary – for example, to check the brake lights. **Never let the inspector help you!**

**TIME OF VEHICLE INSPECTION:** Although local management determines the beginning function of the carrier, M-41 Section 922.51f reads that, “generally vehicle inspection is made promptly after the carrier records his reporting time.” A similar statement appears in M-39 Section 222.214b.

### **U.S. POSTAL SERVICE EXPANDED VEHICLE SAFETY CHECK**

1. Look under body for oil and water leaks.
2. Inspect two front tires for inflation and wear.
3. Check hood latches.
4. Check front for body damage.
5. Check left side for body damage.
6. Check left door lock.
7. Check for rear end leaks.
8. Check all rear tires for inflation and wear.
9. Check rear for body damage.
10. Check rear door lock.
11. Check right side for body damage.
12. Check right door lock.
13. Open door and move into driving position.
14. Start engine. (If in enclosed area, wait until after step 21.)
15. With assistance - adjust pot-lid and left front mirror.
16. With assistance - check headlights, tail lights, brake lights, 4-way flashers, and directional signals, front and rear.
17. Adjust right side rear view mirror.
18. Adjust center rear view mirror.
19. Check steering wheel play.
20. Check accident report kit.
21. Check window locks.
22. Check windshield wipers and washers.
23. Check horn.
24. Check gauges (**gas gauge requires 30 seconds for “warm-up”**).
25. Check foot brake (no more than 2 inches free play).
26. Check hand brake.
27. Check seat belt and fasten.

**NOTE:** This checklist has been programmed to take the driver in a logical sequence around the RHD vehicle with a minimum of lost motion. For LHD vehicles - work from right side to rear to left side beginning at Item 5. Items 15 and 16 - if no assistance readily available, handle personally.

# % To Standard and DOIS

The number called “% to standard” is derived from a DOIS computation. The DOIS program arrives at the PTS number by totaling all time used to case and withdraw mail and divides that number by the totals of flats and letters. **Remember:** We do not acknowledge % to Standard.

## Example #1

Letters	1500	Divided by 18	=	83 min. casing	TOTAL TIME: 167 MINUTES
Flats	<u>450</u>	Divided by 8	=	56 min. casing	100% OF STANDARD
Total	1950	Divided by 70	=	28 min. withdrawal	

% to standard for this example would be 100% to standard. Each function took the exact amount of time for the minimum 18 & 8 Standard. In the cases below % to Standard is arrived at by dividing the ACTUAL TOTAL by 100% of Standard.

## Example # 2

Letters	1500	Actual time	=	75 min. casing	TOTAL TIME: 147 MINUTES
Flats	<u>450</u>	Actual time	=	49 min. casing	88% OF STANDARD
Total	1950	Actual time	=	23 min. withdrawal	(147 ÷ 167 = 0.880)

In this case the PTS is 12% LESS than 18 & 8 meaning the Carrier cases 12% FASTER than 18 & 8.

## Example # 2

Letters	1500	Divided by 18	=	92 min. casing	TOTAL TIME: 187 MINUTES
Flats	<u>450</u>	Divided by 8	=	65 min. casing	112% OF STANDARD
Total	1950	Divided by 70	=	30 min. withdrawal	(187 ÷ 167 = 1.119)

In this case the PTS is 12% MORE than 18 & 8 meaning the Carrier cases 12% SLOWER than 18 & 8.

In all the examples above the mail volume was the same. In reality volume is different each day. DOIS comes up with the daily PTS based on the volume figures input by the supervisor for that day. The program then computes the PROJECTED time. Projected time is the amount of time DOIS estimates to case and withdraw X amount of mail based on the individual PTS assigned each Carrier based upon their last inspection. Once the Carrier has clocked out to the street the program computes the ACTUAL time taken and volume to arrive at that day’s actual % to Standard. Those computations are done for individuals and for the office as a whole.

A primary reason DOIS is not accepted by the NALC is its inherent flaw of being based on numbers input by managers. If the numbers are not accurately input, nothing based on those numbers will be reliable. DOIS has no guarantee of accuracy or of providing Carriers credit for all the work done because of the human element involved. Management can manipulate the DOIS output by their control of the input. And they can change any Carrier’s PTS, based on whether they like them or not.

Carriers need to know that DOIS is simply a management estimator, nothing more. There is no Contractual requirement for any Carrier to achieve DOIS estimates. Do not allow yourself to be bullied into working to achieve their numbers. Give a fair days work consistently -- the key being consistency. Your work pace should be about the same as when you were last inspected. Discipline related to not meeting DOIS estimates won’t stand providing you are performing the job properly according to the M-41. Learn the rules on the use of the PS Form 3996 and refuse to be intimidated.

## What You Should Know About DOIS

DOIS uses some base times for fixed office time and street time for each route. The fixed office time should come from an actual count and inspection. This time represents the total of line item credit that a carrier uses from the 1838c forms. If an actual time is not put in then the system will use the base minimum that is 28 minutes (or 38 minutes if there is an AM office break).

We have found that most carriers actually use (without AM office break) about 40-45 minutes of fixed office time (AM + PM) some carriers have needed as much as 65 minutes. (and marriage mail day always uses more even though DOIS will not automatically credit it). The carrier is also given a casing factor based on their performance vs. the standards – known as Percent to Standard – (18 - 8 - 70).

This productivity factor or percentage calculates how much office time is needed after the supervisor inputs the daily totals.  $\text{Total mail} \times \text{office factor} + \text{base fixed time} = \text{total office time}$ .

The street time is either taken from a 3999 or a count and inspection. The street time base does not change.  $\text{Street time base} + \text{calculated office time} = \text{total time}$ .

Some things to keep in mind: DOIS is an estimate tool, not a standard. Productivity factors are either one-day snapshots or weekly averages and the daily actual performance will vary. "Percent to Standard" is not a standard. It cannot be used as a daily requirement to demand performance levels. The street time base is just a base, not a standard. Every day is different and there is no such thing as a fixed street time requirement. We do not have evaluated routes!

We have found that on foot routes, marriage mail can take as much as an additional hour of street time over normal times and on motorized routes it goes from 15 minutes to 45 minutes more than other days. DOIS is an estimate tool. It is not a standard.

The rules in the M-41 are the working basics for carriers to follow. Estimate your work day and inform the boss of your needs. Even if the base standards were perfect, the daily mail volume entries that the bosses make can be grossly inaccurate. Our comparisons of DOIS vs. actual during a recent count and inspection showed as much as 1 hour and 15 minutes of flats (approx. 500 flats) not included in the counts. It was political mail and it was thin and hidden under other flats. Of course, in this instance, the boss and the carrier disagreed by around an hour as to how much time the carrier would need. The carrier's relied on their expertise while the boss relied on the DOIS estimate. The carrier was right.

## DPS volume

**You have the right to verify the DPS count and I highly suggest you do so.**

DPS volumes are often not correct.

If, for one reason or another, you decide not to verify the DPS count, take a look at how many trays of DPS you have. A rule of thumb is that there will be between 400 and 500 pieces of mail in a tray of DPS. If, for instance, you have 4 trays of DPS, but your count is showing 4,600 pieces, it would be wise to count a tray of it, and to question the count given to you.

I have seen several situations where the manager used the DOIS DPS count to give the carriers this figure. Sometimes DOIS will inadvertently download the DPS twice, or the manager will get the DPS count from DOIS before it has downloaded it all. This error should be obvious, as the number of pieces will be drastically wrong.

**THE CONSULTATION(S)** Management must consult with the regular carrier regarding evaluation and adjustment of his or her assigned route. Carrier routes are evaluated and adjusted using the complex data-gathering process described in Chapter 2 of the M-39 and explained in detail in this manual. However, while numbers and averages and data are useful in evaluating times and adjustments, postal regulations also implicitly recognize that the individual letter carrier assigned to a route is in the best position to make these assessments.

These consultations are mandatory. Management is not allowed to simply meet with the carrier and tell him or her what they came up with and what adjustment management intends to make. To consult means to seek an opinion as a guide to one's own judgment. You, the regular carrier, have an important role in determining the evaluated time of, and adjustment to your assigned route. Do not allow management to pretend to consult, with a wink and nod, and simply go through the motions.

**Postal regulations are very explicit about what is required regarding consultations. Arm yourself with detailed knowledge of those regulations. They require management to do all of the following:**

**1. Consult within time constraints.** Management must place adjustments into effect within 52 calendar days of the completion of the count (M-39 Section 211.3). Management must complete all consultations within that 52 day window in a manner that allows full consideration of the carriers' comments and suggestions concerning the evaluation of the route and any proposed adjustments.

**2. Provide documents in advance.** Management must give the carrier the following documents *in advance* of the consultation regarding the evaluation of the route:

A. Completed copies of Form 1838 at least 5 calendar days prior to consultation (M-39 Section 241.4, M-41 Section 923.1).

B. Completed copy of front of Form 1840 at least one day prior to consultation. This completed copy must contain the following (M-39 Section 241.4, M-41 Section 923.1):

1. Totals and averages from Forms 1838
2. Day of inspection data
3. Examiner's comments
4. Analysis of office work functions
5. Time recordings

C. Partially completed copy of reverse of Form 1840 or attachments thereto, at least one day prior to consultation. It must contain the following:

1. All time disallowances (M-39 Section 242.347)
2. Related comments (M-39 Section 242.345-.347)

**3. Discuss certain matters.** Management is required to discuss certain matters at:

A. The evaluation consultation—including:

1. Mail volume (M-39 Section 232.1c)
2. Evaluation of route (M-39 Section 232.1c)

3. Any time adjustment to evaluated street time based on alleged improper practices or operational changes (M-39 Section 242.345)
4. Any adjustment of evaluated street time based on a claim that conditions during 8 week timecard period or week of count were not normal so as to justify not including such day or days in base street time computation (M-39 Section 242.346)

B. The adjustment consultation (if management proposes relief or addition to your route)—including (M-39 Section 243.11):

1. The proposed relief or addition
2. The reasons for the proposed adjustment
3. Whether the carrier agrees or disagrees
4. The reasons the carrier agrees or disagrees
5. The comments and recommendations of the carrier

**4. Record your recommendations and comments.** Management must enter the following on the 1840 (M-39 Section 243.11):

- A. Your comments
- B. Your recommendations
- C. Whether you agree or disagree with the proposed adjustments
- D. The reasons for your agreement or disagreement

**5. Refrain from requiring you to sign anything.** *Management is not allowed to require you to sign a statement during the consultation(s) (M-39 Section 243.11a).* **DO NOT** sign anything!

**6. Consult with you a second time.** Management must hold a second consultation if adjustments are proposed (M-39 Section 243.11a).

**7. Consider your suggestions.** Management is required to consider the suggestions from the carrier serving the route (M-39 Section 243.11c).

**8. Permit notation of absence of documentation of street time disallowances.** If management attempts to adjust your street time due to alleged improper practices, operational changes, or claimed abnormal conditions during the 8-week analysis, management must document it on the reverse of the 1840 and discuss it with you during the consultation regarding the route evaluation. If management fails to so document, you have the right, during the consultation, to note the absence of such documentation by writing a notation on, and initialing and dating, the 1840 (M-39 Sections 242.345 & .346).

**9. Disallow street time adjustments if documentation is not provided to carrier within 1 week of notation by carrier.** If you make a notation on the 1840, as noted above, about the absence of documentation supporting a management time disallowance, management has 1 week to supply such documentation to you. If management fails to do so within 1 week, the time adjustment shall be disallowed (M-39 Sections 242.345 & .346).

**10. Provide completed copy of reverse of 1840 promptly after consultation.** Promptly after consultation, if the carrier requests that the reverse of his or her copy of Form 1840 be completed,

the carrier must immediately give the copy to the manager for completion and management must return it no later than 7 calendar days (M-39 Section 243.11a).

You should make every effort to show your Forms 1838-C, 1838, and Form 1840 to your NALC representative prior to the consultation. Your union representatives can help identify any problems or mistakes on the forms. You will thereby be in a better position to protect your rights at the consultation. If you cannot obtain an NALC review in advance, don't panic. There will be time afterwards to address any problems.

Remember:

- You receive completed Forms 1838 five (5) days in advance
- You receive completed front Form 1840 one (1) day in advance
- You receive partially completed reverse Form 1840 one (1) day in advance
- You receive full discussion at consultation
- Management must write your comments on the Form 1840
- No requirement for you to sign
- You write on Form 1840 the absence of any documentation
- You request a completed copy of Form 1840 (front and back)
- Management has 7 days to return documentation and 1840

## **AFTER THE CONSULTATION**

You should contact your shop steward for grievance investigation and processing if management violates any of the procedures explained above. In addition, you should contact your shop steward for grievance investigation and processing in the following circumstances:

- 1. Unfair or incorrect adjustment.** If you believe the adjustment to your route is incorrect or unfair;
- 2. Management use of COR.** If management uses the Carrier Optimal Routing (COR) program to adjust, or aide in adjusting your route; or
- 3. No adjustment in 52 days.** If management fails to implement any needed adjustment within 52 days after the count and inspection period concludes. Management must implement adjustments within 52 days, unless an exception is granted by the district manager. Exceptions may only be made when warranted by valid operational circumstances, substantiated by a detailed written statement, and submitted to the local union within seven days of the grant of the exception.

The union has the right to grieve any exception (M-39 Section 211.3, M-01072).

It is important to note that the evaluation process does not end with the implementation of an adjustment. Management is required to evaluate the adjustment. The evaluation includes analysis of data generated after implementation of the adjustment, including volume data, time records, etc. In addition, management is required to complete a new Form 3999 after adjustments are implemented to reflect the new authorized route travel pattern and schedule (M-39 Section 243.613).