

ART. 7.2 (CROSS CRAFT) GRIEVANCE CHECKLIST

CITE: Articles 7.2, 8.5, & 19 (if contrary to automation staffing guidelines) & 15.3 (if previously grieved and settled) and Arbitration; Bloch (1982) Case # AS-W-0656; CIM. Step 4 dated September 4, 2008.

CORRECTIVE ACTION: Pay the appropriate Mail Handlers as determined by the Union at the overtime rate for all hours improperly worked by clerks and/or PSEs at primary craft Mail Handler duties (need to identify hours asked for). Cease and desist assigning such work to the Clerk craft in the future.

1. Because of the RI-399 Dispute Resolution Process, a copy of the relevant portions of the branch inventory of operations after April 29, 1992 or prior walk-through results will be included as well. Copy of Mail Handler bids, JSAs, assignment sheets, L-M minutes, LMOU provisions, past grievance resolves, or statements from Mail Handlers who do (or have done) the disputed duties on a regular basis. Mail Handler OPN vs. not a Clerk OPN.

2. Local LDRC inventory for both Mail Handler and Clerk operations. National jurisdictional determinations.

3. List of Clerks and/or PSEs performing Mail Handler functions to include names, specific work by the Clerks, starting time and ending time by the Clerks and/or PSEs.

4. Individual clock rings, Employee Everything Report (EER) of each Clerk and/or PSE for the entire day in question.

5. Operation clock rings (EER by OPN or P/L) in at least 15 minute increments of operation Clerk (s) and/or PSEs were clocked on to during time in question. This is especially important if the dispute involves automated equipment with fixed staffing levels.

6. Individual witness statements from Clerks, PSEs and/or Mail Handlers stating everything contained in item # 3 above.

7. Overtime and volume records from same period last year and the immediately surrounding few days to prove: A. It was NOT an exceptionally heavy work load period for the Mail Handlers while at the same time; B. It was NOT an exceptionally light workload period for the Clerk craft.

8. Show it is not a light Clerk load. Copy of clock rings for any Clerk craft employee who worked more than four hours and/or any Clerk PSEs at the time of the violation (date, time -be specific).

9. Copy of Mail Handler schedule, overtime desired list, overtime tracking chart and seniority list to prove which Mail Handler(s) were available and should therefore be paid. Include any volunteers that require more than 12 hours.

10. Copies of: information requests, supervisor's Step One Summary (PS Form 2608), written Step Two decision, index of exhibits, and all evidence to disprove management's contentions.

11. Operational reports that supports our position.

12. DMCR - Daily Mail Condition Report