

Contract Administration Unit

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Route inspections, Part 3

Last month's *Contract Talk* explained the PS Form 1838-C, *Carrier's Count Mail—Letter Carrier Routes Worksheet* and described some of the line items associated with city carrier office work in addition to casing and pulling mail. This article will explain management's responsibilities when evaluating routes based on the data obtained during the count and inspection.

Route evaluation

As stated in the April 2019 *Contract Talk*, the goal of any route count and inspection is to adjust the routes to as close to eight hours as possible. With this in mind, management must evaluate the office and street times for each route and determine whether the route is either overburdened and requires relief or less than eight hours and requires an addition. After the completion of the count and inspection, prior to any adjustments being made, management should consult with the regular carrier on the route and explain the evaluated office and street times.

The PS Form 1840, *Carrier Delivery Route—Summary of Count and Inspection* provides a synopsis of the data management will use to evaluate the route and make any needed adjustments. This is a two-page form consisting of the PS Form 1840 and PS Form 1840 (reverse). The first page includes the data from the count and inspection used for evaluating the route while the second page is used to show the office and street times selected for the evaluation, as well as any adjustments made to the route.

241.1 Form 1840, *Carrier Delivery Route—Summary of Count and Inspection*, provides for consolidating and completing the evaluation of data recorded on Forms 1838 of the count and inspection period. It provides also for comments by the examiner inspecting the route and by the postmaster or designated manager making the adjustments. Where additional space is needed, attachments may be used. (The form also provides a record of adjustments made, and the adjusted route. See Part 243.)

The information on PS Form 1840 is derived from several sources, including other forms used during the count and inspection process.

The PS Form 1838, *Carrier's Count of Mail—Letter Carrier Routes (Mngt. Summary)* contains the information recorded on the PS Form 1838-C by the carrier servicing the route or the inspector who completed the form on the inspection day(s). Copies of PS Forms 1838 and 1840 must be provided to the carrier prior to the evaluation consultation. This requirement is found in Section 923.1 of *Handbook M-41*, which states:

923.1 A completed copy of the front of Form 1840, *Carrier Delivery Route—Summary of Count and Inspection*, reflect-

ing totals and averages from Forms 1838, day of inspection data, examiner's comments, and analysis of office work functions and time recordings, will be furnished carrier at least 1 day in advance of consultation. Completed copies of Form 1838 will be given the carrier at least 5 calendar days prior to consultation.

The PS Form 1840 also shows the total street time used by both regular and replacement carriers each day of the inspection as well as the average street time for the week. Only the time used by the regular carrier should be used to determine the average. As stated in Section 241.33 of *Handbook M-39*:

241.33 Bracket [] the time entries in columns A, B, C, D, and E for the days on which the route was served by a replacement carrier or carrier technician T-6 because these figures are to be excluded when entering the figures on the total line for columns A, B, C, D, and E.

Exceptions to this provision are in the case of a full-time route without a regular carrier or an auxiliary route. In these cases, the carrier who serviced the route during the week of inspection would be used to determine the average street time.

Once the data has been transferred to the PS Form 1840, management must evaluate the data and determine the office and street times for each route. Union representatives should ensure that the data is accurately transferred to this form as any discrepancies could have a negative impact on the route evaluation and any subsequent adjustments.

Office time

When determining office time, management must select either the average office time used by the carrier during the week of inspection or the standard office time allowance. This requirement is found in Section 242.311 of *Handbook M-39*, which states:

242.311 Under normal conditions, the office time allowance for each letter route shall be fixed at the lesser of the carrier's average time used to perform office work during the count period, or the average standard allowable office time.

Standard office time is determined by dividing the number of cased letters by 18, the number of cased flats by eight, and the total number of cased letters and flats by 70. These three figures are then converted to minutes and added to the standard office allowances for the line items on the PS Form 1838-C (excluding time spent performing line 22 and 23 functions) to establish a time.

A detailed explanation of line items and standard time allowances is found in Exhibit 222.214a(4) of *Handbook M-39*.

Section 242.312 addresses whether an adjustment may

Route inspections, Part 3 (continued)

be made to office time to account for variations in mail volume during the mail count:

242.312 No mail volume adjustments will be made to carrier office work (casing and strapping out functions) or street work evaluations unless the mail volume for the week of count and inspection is at least 13% higher or lower than the average mail volume for the period between the most recent regular and the current inspection (excluding the months of June, July, August, and December).

Management does not have the right to reduce the office time below the standard time based on allegations of time-wasting practices during the mail count. National Arbitrator Benjamin Aaron addressed this issue in case NC-C-11675, where he found “even though the Postal Service can demonstrate that the grievant was regulating his performance, it cannot reduce the office time below the average standard allowable time.” He determined that the language in Section 242.211 allows management to address irregular performance during the count and inspection:

242.211 If the actual office is *under standard* on some days and *over standard* on other days during the count week, the carrier must be interviewed to determine the reason for the irregular performance. The causes of slow and irregular performance and the corrective action taken should be indicated under *Comments* on Form 1840.

Street time

When determining the street time, management must select either the average street time during the week of inspection or the eight-week average street time from the PS Form 1840-B, *Carrier Time Card Analysis*. This requirement is found in Section 242.321 of *Handbook M-39*, which states:

242.321 For evaluation and adjustment purposes, the base for determining the street time shall be either:

- a. The average street time for the 7 weeks random timecard analysis and the week following the week of count and inspection; or
- b. The average street time used during the week of count and inspection.

242.322 The manager will note by explanatory *Comment* on the reverse of Form 1840 or attachments thereto why the base street time allowance for the route was established at the time selected. The manager’s selection of the street time allowance cannot be based on the sole criterion that the particular time selected was the lower.

This section makes it clear that management must justify the selected street time and not base its decision solely on the fact that the selected time was the lower of the two.

The data from the seven-week random analysis is determined based on the language in Section 242.323 of *Handbook M-39*, which states in part:

242.323 Selection of the 7 weeks for the random timecard analysis shall be based on the following:

- a. Within 4 weeks prior to the week of count and inspection, the local union representative will make a random drawing of numbered lots from 1–4 to be used in determining the 7 random weeks to be selected for all routes at the delivery unit.

A complete explanation of the random draw process is provided in Section 242.323 of *Handbook M-39*. Once the weeks have been selected, the data is transferred to PS Form 1840-B. A sample of this form, which contains four pages including the instructions, is found in exhibit 213d of *Handbook M-39*.

“Management does not have the right to reduce the office time below the standard time based on allegations of time-wasting practices during the mail count.”

Available resources

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 and other resources are available on nalc.org. 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. NALC members may obtain a copy of the *NALC Route Inspection Pocket Handbook* through their NBA office or the NALC Supply Department. National settlements and memorandums of understanding (MOUs) can be found in the Materials Reference System (MRS) at nalc.org/mrs. Past Contract Talk articles pertaining to these issues are available at nalc.org/workplace-issues/resources/nalc-publications.