



# NATIONAL RURAL LETTER CARRIERS' ASSOCIATION

1630 Duke Street

Alexandria, Virginia 22314-3467

Phone: (703) 684-5545

Executive Committee

DON CANTRIEL, *President*

JEANETTE P. DWYER, *Vice President*

CLIFFORD D. DAILING, *Secretary-Treasurer*

JOEY C. JOHNSON, *Director of Labor Relations*

RONNIE W. STUTTS, *Director of Steward Operations*

STEVEN L. TRAYLOR, *Chairman*

P.O. Box 520

Hillsboro, IL 62049-0520

(217) 532-2166

September 16, 2010

DONALD L. MASTON

P.O. Box 902710

Palmdale, CA 93590-2710

(661) 266-3879

ROBERT T. HORNE

P.O. Box 7930

Thomasville, GA 31758-7930

(229) 228-6111

SUSAN T. KNAPP

P.O. Box 599

New Hampton, NY 10958-0599

(845) 956-1117

Mr. William Daigneault  
Manager, Contract Administration (NRLCA)  
Labor Relations, Room 9126  
United States Postal Service  
475 L'Enfant Plaza, S. W.  
Washington, D. C. 20260

Certified Mail Number: 7010 0290 0000 62372401  
Hand delivered

Dear Mr. Daigneault:

Pursuant to Article 15, Section 4(D), of the parties' National Agreement, the Association submits this National Level Grievance. The NRLCA files this National Level Grievance at the step 4 level as the matter in dispute is of substantial significance to rural carriers nationwide.

On May 9, 2003, the USPS, NALC, and NRLCA ("the parties") entered into a MOU, establishing a protocol and task force for handling work jurisdiction disputes between the parties, including the assignment and conversion of deliveries. Subsequently, the Parties entered into several related agreements, including the Guideline Principles to address City/Rural jurisdictional issues and City-Rural Process Agreement.

On April 29, 2008, the Parties renewed this commitment to jointly resolve future City/Rural jurisdictional disputes including the assignment and conversion of deliveries. The April 29, 2008 MOU sets forth a detailed procedure to resolve all such disputes. The MOU states (in relevant part):

*"If a grievance concerning the assignment or conversion of city and/or rural deliveries is filed, the representatives at the initial step will complete the joint grievance form and document the file. If the parties propose to settle the grievance at Step 1 or Step 2 United States Postal Service/National Rural Letter Carriers' Association (USPS/NRLCA) Agreement or Step A United States Postal Service/National Association of Letter Carriers (USPS/NALC) Agreement in a manner which would result in the reassignment of deliveries or the assignment of future deliveries, such settlement will require agreement by authorized representatives of the NALC, the NRLCA and the Postal Service. If the grievance is not settled, and appealed to Step B (USPS/NALC or Step 3 (USPS/NRLCA), the representatives at that step will:*

Mr. William Daigneault  
May 26, 2010  
Page Two

1. *Ensure that the grievance file is properly developed and documented.*
2. *Prepare a written joint recommendation regarding their proposed adjudication of the grievance; i.e., resolve, withdraw, impasse, and the reasoning for their respective positions. These proposed recommendations will not be cited in the case at issue or any other case, should the grievance proceed to arbitration.*
3. *Forward the joint grievance file and supporting documentation with color coded maps, along with written recommendations to the appropriate union and management offices below for review and adjudication by the national city/rural committee."*

The Postal Service has, in direct conflict and in blatant violation of these agreements, as well as the October 22, 2008, MOU M-01694 between the USPS and NALC, involving the assignment of new deliveries and related documents, instituted a process without NRLCA participation or agreement, to convert deliveries originally assigned to rural delivery to city delivery.

It is the position of the NRLCA that the Postal Service conduct described above violates the parties May 9, 2003 MOU and related MOU's, the National Agreement, including but not limited to, Articles 5, 8, 9, 10, 15, 19, 21, 30, Postmaster General Potter letter dated February 23, 2009, and MOU 14 which states in part:

*"Emphasis must be placed on the corporate objective that all managers, supervisors, and union representatives give the highest priority to compliance with our collective bargaining agreement. The United States Postal Service and the National Rural Letter Carriers' Association are fully committed to abide by the provisions of the National Agreement."*

Further, it is the position of the NRLCA that the Postal Service's conduct detailed above violates Federal labor law, including but not limited to, Sections 8(a)(1),(3) and (5) of the National Labor Relations Act.

By way of remedy the NRLCA request that immediately the Postal Service cease and desists from any further conversion of rural to city delivery, and immediately convert any converted deliveries that were improperly converted from rural to city delivery back to rural delivery, additionally, the Postal Service should provide all affected rural craft employees with a fully made-whole remedy, including but not limited to, all salary and benefits, with interest at the Federal Judgment Rate.

Please contact my office to determine the earliest date for us to discuss this very important issue.

Sincerely,



Don Cantriel  
President

DC:am

cc: NRLCA National Officers  
NRLCA Legal Counsel  
File