



National Association of Letter Carriers

Fredric V. Rolando
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August 5, 2020

Certified Mail: 7000 1530 0002 6314 0354

Doug A. Tulino, Vice President
Labor Relations
United States Postal Service
475 L'Enfant Plaza, SW
Washington, DC 20260-4100

Dear Doug:

Pursuant to Article 15, Section 3.F of the National Agreement, I hereby initiate at the national level the following interpretive dispute arising from management's unilateral implementation of the delivery initiative test called Expedited Street/Afternoon Sortation (ESAS).

On July 16, 2020 USPS notified NALC of the ESAS test that was scheduled to begin on July 25 in approximately 400 test sites. On July 28, USPS provided us with revised guidelines for the test. The test has since been initiated and is ongoing.

The ESAS initiative substantially alters delivery practices and procedures codified in the Handbooks M-39 and M-41. These changes directly impact terms and conditions of employment of city letter carriers in violation of Article 19 of the National Agreement.

For example, the ESAS test imposes restrictions on letter carriers' morning casing duties which conflict with M-39 Section 121.211. Similarly, the ESAS test prevents carriers from withdrawing mail in violation of M-41 Section 223.11. Additionally, letter carriers do not obtain accountable items until after they have pulled the mail from the case in violation of M-41 Section 262.1.

The ESAS test raises the same fundamental interpretive issue that NALC has raised in previous national level disputes: whether the Postal Service may suspend compliance with the National Agreement or applicable regulations under the guise of conducting a "test." It remains our position that management may not unilaterally implement tests which are inconsistent with regulations codified in handbooks and manuals without first reaching an agreement with the Union.

Doug A. Tulino
August 5, 2020
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A meeting to discuss this interpretive dispute should be scheduled. Please have your representatives contact NALC Executive Vice President Brian Renfroe to make the necessary arrangements.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Fredric V. Rolando', with a stylized flourish at the end.

Fredric V. Rolando
President