



NATIONAL ASSOCIATION OF POSTAL SUPERVISORS

National Headquarters
1727 KING STREET, SUITE 400
ALEXANDRIA, VA 22314-2753
(703) 836-9660

September 29, 2023

Board Memo 122-2023: NAPS Response to the USPS Proposed RPDC and LPC Staffing

Executive Board,

Attached is NAPS response to the Postal Service proposed EAS staffing for RP&DC and LPC. NAPS believes the USPS must live up to and achieve its obligation under 39 U.S. Code § 1004 (a), in which USPS is required to provide compensation, working conditions, and career opportunities that will assure the attraction and retention of qualified and capable supervisory and other managerial personnel.

Please share this information with your membership.

Thank you, and be safe.

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*Office of
National President*

September 29, 2023

Mr. Bruce Nicholson
Manager, Labor Relations Policy Administration
United States Postal Service
475 L'Enfant Plaza, SW
Washington, DC. 20260

Re: Response to Proposed RP&DC and LPC EAS Staffing

Dear Bruce,

Thank you for meeting with the NAPS Resident Officers on September 19, 2023, on the USPS Proposed EAS Staffing for the RP&DC and LPC (attached).

NAPS also appreciates having Rachel Danielsen and her team on to discuss these proposed changes. Unfortunately, NAPS did not hear any justification of the ration being used to continue using the current EAS to craft ratios.

This ratio has been a long-standing concern for NAPS, which has not been addressed in past discussions with the USPS. Since the initial changing of the EAS to craft ratio's moving it to the current 1:22 / 1:25 ratio, the USPS leadership has had to rely on 204-B usage above the established complement to maintain plant processing operations.

The impact of this failed 1:22 / 1:25 ratio was clearly demonstrated in USPS reporting that document 204-B usage in excess if the authorized EAS compliment for Function 1 Operations was equivalent to over 3,100 full time EAS position. As a note, all subsequent requests for this data have been met with the response from USPS HQ that there was no one who knew how to make that analytical analysis.

The response of Ms. Danielsen, as to using the newly created Relief Supervisor positions to address the USPS documented and NAPS noted discrepancy in the USPS ratio, would be a misuse of the intended purpose of the Relief Supervisor position and serve only to worsen the staffing issues in Function 1 operations. The Relief Supervisor position was created for and supported by NAPS to provide coverage during days off and scheduled vacations of the Form 50 EAS working in that particular function, not to serve as an Operational Supervisor filling an understaffing void in the complement model.

NAPS also believes that the USPS must consider how it will live up to and achieve its obligations under 39 U.S. Code § 1004 (a) to provide;

- 39 U.S. Code § 1004 (a) - It shall be the policy of the Postal Service to provide compensation, working conditions, and **career opportunities (emphasis added)** that will assure the attraction and retention of qualified and capable supervisory and other managerial personnel...

These are the opportunities that are found in higher lever details, cross training opportunities, and special assignments, which would be impaired with staffing to backfill EAS positions.

NAPS' final position point centers on the appeared USPS surrendering of its rights under Article III of Collective Bargaining Agreements (CBA) give Management the exclusive right to;

- **B. to hire, promote, transfer, assign, and retain employees in positions within the Postal Service (emphasis added)** and to suspend, demote, discharge, or take other disciplinary action against such employees; NAPS believes that by allowing unions to negotiate into the CBA who can and cannot serve as EAS is a direct violation of Management Rights.

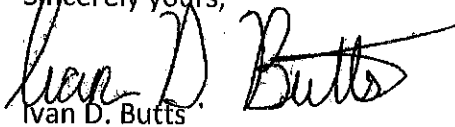
These issues render the proposed staffing for the RPDC both ineffective and inefficient. NAPS does not support this staffing proposal that fails to address the needs of both operations and EAS. NAPS' recommendation are as follows;

1. That the ratio for EAS to craft be set at 1:16.
2. That the ratio for MDO's be set for MDO to SDO 1:10.
3. That the ratio for SMDO be set for SMDO to MDO 1:5

NAPS also recommends that these ratios be reviewed on a yearly basis with NAPS and the USPS to ensure that the effectiveness of ratios is being maintained.

NAPS reserves any commentary on the proposed Maintenance staffing for RPDC for later consultation, but acknowledges that reductions to levels (including accountability) while increasing the areas of responsibility (RPDC over 1million sq ft.) does not appear to be promoting Maintenance Operational effectiveness.

Sincerely yours,



Ivan D. Butts

National President

Proposed Plant Ranking & Staffing Criteria

NAPS Consultation

July 5, 2023

Project Background

The initiative to re-evaluate mail processing and network distribution facilities was considered due to the following factors:

- Structural realignments and changes implemented in FY21 that removed senior plant designations and changed Plant Manager span of control.
- The transportation function was realigned under Logistics Divisions.
- With Delivering for America efforts to redesign both the network and Delivery Units there is a new lens for evaluating the mail processing facilities through the Plant modernization initiative.
- The current plant ranking model was last implemented in 2013.

Plant Ranking

Plant Ranking Criteria and Facility Levels

Today Plant rankings are based on 5 weighted calculations of workload factors (i.e., volume, Total 5 Digits Serviced, Total Possible Deliveries, Equipment Set and Facility Complexity).

The new proposal ranks mail processing facilities based on Function 1 and 3B staffing as validated by HQ processing operations.

Currently 12 levels of mail processing facilities exist (5 PCES and 7 EAS). To align with the new network redesign the plants are being streamlined into 6 levels (3 PCES, 1 V-02 and 2 EAS).

Current Plant Levels	
PCES-01	EAS
Major/Metro	EAS-25
Level 1	EAS-24
Level 2	EAS-23
Level 3	EAS-22
Level 4	EAS-21
	EAS-20
	EAS-19

New Plant Levels
Major
Level 1
Level 2
V-02
EAS-25
EAS-23

Functional Staffing Models

Mail Processing – MDO/SDO Calculation

Manager Distribution Operations' level is tied to the level of the plant and number of authorized MDOs and differ based on the type of facility.

MDOs and SDOs based on 1:22 / 1:25 ratios of on-rolls craft, with a minimum number of MDOs at each facility corresponding to number of tours.

- On-rolls clerks/mha divided by 22 = total number of MDOs and SDOs authorized
- On rolls clerks/mha divided by 25 = total number of SDOs
- Total number of MDO/SDOs authorized – SDOs = MDOs

On-rolls excludes MHA and PSEs that are not working or have zero (0) work hours for a fiscal year. Plants with three tours that earn fewer than 3 MDOs exchange one earned SDO per additional MDO authorized.

Mail Processing – Current Staffing Criteria

The following chart shows the distribution of MDO resources amongst the job levels by facility when five (5) or fewer positions are earned.

If an odd number of positions remain, the additional MDO is authorized at the higher level.

Facility Type	Facility Level	MDO 19	MDO 20	MDO 22	MDO 24
P&DC	EAS-24	All			
P&DC	EAS-25	All but 1	1		
P&DC	Level 4	Half the rest	Half the rest	1	
P&DC	Level 3		Half	Half	
P&DC	Level 2		Half the rest	Half the rest	1
P&DC	Level 1		Half the rest	Half the rest	2
P&DC	Major		Half the rest	Half the rest	2
NDC	Level 3	Half the rest	Half the rest	1	
NDC	Level 2		Half	Half	
NDC	Level 1		Half the rest	Half the rest	1
ISC	EAS-25		All but 1	1	
ISC	Level 2		All but 1	1	
ISC	Level 1		Half the rest	Half the rest	2

The following chart shows the distribution of MDO resources amongst the job levels by facility when more than six (6) or more positions are earned.

# MDO Auth	MDO 20	MDO 22	MDO 24
6	2	2	2
7	2	2	3
8	2	3	3
9	3	3	3
10	3	3	4
11	3	4	4
12	4	4	4

Mail Processing - Proposed

Facilities will utilize consistent standard staffing criteria and be tied to the level of the plant and number of craft employees on roll.

Facility Level	Proposed Mail Processing					
	MDO-19	MDO-20	MDO-22	MDO-24	SR MDO-25	SR MDO-26
EAS-23	Rest	1				
EAS-25	Half the Rest	Half the rest	1			
V-02		Half the rest	Half the rest	1		
Level 2		Half the rest	Half the rest	2	1	
Level 1		Half the rest	Half the rest	2		
Major		Half the rest	Half the rest	2		1

On-rolls *excludes*: Mail Handlers and PSEs that have zero work hours for the fiscal year.

- MHAs and PSEs on-rolls and working but exceeding contractual caps are not included in the calculation.

Facilities that do not earn MDOs to cover the tours they operate can exchange SDO-17s for MDO-19s until five (5) MDOs in total are authorized if the MDO/SDO ratio does not exceed 1:3.

Mail Processing – Job Titles

Some job titles have changed. The table below shows previous and new job titles.

Previous Job Title	New Job Title	Abbreviation
Lead Senior Manager Distribution Operations	Senior Manager Distribution Operations	SR MDO
Senior Manager Distribution Operations	Senior Manager Distribution Operations	SR MDO
Manager Distribution Operations	Manager Distribution Operations	MDO
Supervisor Distribution Operations	Supervisor Distribution Operations	SDO

In-Plant – Current Staffing Criteria

Manager In-Plant Support is tied to plant level and OSS/OIE authorization is based on an average calculation for all facilities within the same ranking category, determined by volume and product variety.

Facility Type	Facility Level	CURRENT CRITERIA								TOTAL
		MIPS 21	MIPS 23	MIPS 25	OIE 21	OIE 23	OSS 17	OSS 18	OSS 20	
MPF	ALL						1			1
P&DC	EAS-24						2			2
P&DC	EAS-25	1			1		2			4
P&DC	Level 4		1		2		2		1	6
P&DC	Level 3		1		2		3		1	7
P&DC	Level 2			1	2	1	4		1	9
P&DC	Level 1			1	3	1	5		2	12
P&DC	Major			1	3	1	5		2	12
NDC	Level 3		1		2			2	1	6
NDC	Level 2			1	2	1		3	1	8
NDC	Level 1			1	3	1		4	2	11
										78

Processing Support – Proposed

Facilities will utilize consistent standard staffing criteria and be tied to the level and type of the plant.

Facility Level					LPC Staffing				RPDC Staffing			
	MPS-22	MPS-24	MPS-25	MPS-26	IEP-21	IEP-23	PSS-17	PSS-20	IEP-21	IEP-23	PSS-17	PSS-20
EAS-23							1	1				
EAS-25	1						1	1				
V-02		1					2	1				
Level 2			1		1		2	1	1	1	3	2
Level 1			1			1	3	1	2	1	3	2
Major				1	1	1	3	1	3	1	4	2

Some job titles have changed. The table below shows previous and new job titles.

Previous Job Title	New Job Title	Abbreviation
Manager In-Plant Support	Manager Processing Support	MPS
Operations Support Specialist	Processing Support Specialist	PSS
Operations Industrial Engineer (Field)	Industrial Engineer (Processing)	IEP

Maintenance – Current Staffing Criteria

Maintenance staffing is determined by authorized craft complement and derived from eWHEP which is directly correlated to the size and complexity of maintenance operations. Manager levels have been frozen since 2015.

Authorized Craft	CURRENT CRITERIA													
	MM 19	MM 21	MM 22	MM 23	MM 24	MM 25	MMO 20	MMO 21	MMO 22	MMO 23	MMOS 19	MMOS 20	SMOS 17	MES 19
< = 27	1*													
28 - 51	1												1	
52 - 75		1									1			
76 - 116			1				1				1			1
117 - 156				1				2			1			1
157 - 196					1				3			1		1
197 - 296						1				3		1		1
> = 297						1				4		1	1	1

Non-maintenance capable offices with less than 28 authorized craft do not earn a Manager Maintenance.

One Manager, Maintenance Engineering Support (MMES) EAS-20 per district authorized at the senior plant.

Maintenance – Current Staffing Criteria

Authorized Craft	SMO 17	
0 – 15*	0	
16 - 27	1	1:12
28 - 39	2	
40 - 51	3	
52 - 63	4	
64 - 75	5	
76 - 96	6	
97 - 116	7	1:20
117 - 136	8	
137 - 156	9	
157 - 176	10	
177 - 196	11	

Supv Maintenance Operations authorized based on eWHEP authorized maintenance craft. Ratio of 1:12 until 6 SMOs earned, then ratio of 1:20 for the remainder.

- LDC 39 positions not included in the calculation. Maintenance Support Clerk P7-07.
- Non-maintenance capable offices with 11-27 authorized craft earn one SMO.

Maintenance – Proposed

Facilities will utilize consistent standard staffing criteria and be tied to the level of the plant.

Facility Level RPDC/LPC	Proposed Maintenance Staffing									
	MM-22	MM-24	MM-25	MM-26	MMO-19	MMO-21	MMO-23	MMS-19	MMS-21	MSS-19
EAS-23										
EAS-25	1									
V-02		1			1	1		1		
Level 1			1		1	1			1	
Level 2			1		2	2			1	1
Major				1	2	2	1		1	1

EAS-23 facilities will only earn SMOs.

Exception: With approval from HQ Maintenance, facilities can swap SMOs for MMO-19s up to the number of tours they operate if the MMO/SMO ratio does not exceed 1:3.

Maintenance – Proposed

Authorized Craft	SMO 17	
0 – 15*	0	
16 - 27	1	1:12
28 - 39	2	
40 - 51	3	
52 - 63	4	
64 - 75	5	
76 - 96	6	1:20
97 - 116	7	
117 - 136	8	
137 - 156	9	
157 - 176	10	
177 - 196	11	

Supv Maintenance Operation (SMO) - authorized in maintenance capable offices based on eWHEP authorized maintenance craft. Ratio of 1:12 until 6 SMOs earned, then ratio of 1:20 for the remainder.

- LDC 39 positions included in the calculation - Maintenance Support Clerk P7-07.

Maintenance – Job Titles

Some job titles have changed. The table below shows previous and new job titles.

Previous Job Title	New Title	Abbreviation
Lead Manager Maintenance	Manager Maintenance	MM
Manager Maintenance	Manager Maintenance	MM
Manager Maintenance Operations	Manager Maintenance Operations	MMO
Supervisor Maintenance Operations	Supervisor Maintenance Operations	SMO
Manager Maintenance Operations Support	Manager Maintenance Support	MMS
Supervisor Maintenance Operations Support	Supervisor Maintenance Support	SMS
Maintenance Engineering Specialist	Maintenance Support Specialist	MSS

Administrative Support Staff

Administrative Support staffing is provided to Plant Managers by EAS or Craft positions.

Current

Administrative Assistant (FLD) EAS-15

Manager P&DC/NDC/ISC level EAS-25 and above

Secretary P7-07

Plant Managers EAS-24

Proposed

Administrative Assistant (FLD) EAS-15

Executive Plant Managers

Secretary P7-07

Plant Manager EAS-25 and V-02