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October 17, 2023

Mr. Ivan Butts  
President  
National Association of Postal Supervisors  
1727 King Street, Suite 400  
Alexandria, Va. 22314-2753

Dear Ivan:

This is in reference to the Postal Service's July 5 correspondence proposing modifications to the ranking model for mail processing facilities and the non-bargaining staffing criteria and your September 29 response with recommendations to that proposal.

Your recommendations included the following and claimed that the proposed staffing would be ineffective and inefficient:

- the ratio for EAS to craft be set at 1:16.
- the ratio for MDO's be set for MDO to SDO 1:10
- the ratio for SMDO be set for SMDO to MDO 1:15
- these ratios be reviewed on a yearly basis with NAPS and the USPS to ensure that the effectiveness of ratios is being maintained.

You provided other statements such as facilities would be impaired with staffing to backfill non-bargaining positions due to this proposal and that negotiating with unions on "who can and cannot serve as EAS" is a direct violation of Article 3 of Collective Bargaining Agreements.

You provided documentation to support your recommendations, from fiscal year (FY) 2006, of workhours of Function 1 Managers, Supervisors and acting supervisors and claimed that the report showed an excess of 3,100 full-time equivalent assignments due to workhour usage of acting supervisors. Further, you stated that you have asked for this report to be updated and the Postal Service's response was that headquarters lacked the knowledge to perform an analytical analysis. Our response was that we cannot re-create an identical report due to the changes in the report such as the reduction in facilities.

This data is from 17 years ago and the number of facilities has significantly reduced over the years due to increases in automation, technological advancements and efficiency. The data also listed 945 vacancies. As you know, we established the relief supervisor position with the intent to provide coverage on scheduled days off for traditional supervisors and other absences and reduce the reliance on acting supervisors. There are 776 Supervisor, Distribution Operations (SDO) (Relief) positions authorized in Function 1. Relief supervisors are not a factor in the 1:22/1:25 ratio and essentially authorized as an extra position per every 5 supervisors in a facility. If we include the relief supervisor in the ratio, then the 1:22/1:25 is significantly reduced.

There are 363 facilities referenced on the FY06 report. It includes 143 facilities that no longer exist such as Remote Encoding Centers (REC), Air Mail Facilities and Air Mail Centers. Fifteen of those sites are now annexes, subordinate to other function 1 facilities. There were eleven REC sites in 2006 and referenced on the report you provided.

There are 243 facilities in our current network and classified as Processing & Distribution Centers (P&DCs), Mail Processing Facilities (MPFs), Network Distribution Centers (NDCs), International Service Centers and only one Remote Encoding Center. Our proposal is reflective of future operational needs and the staffing that facilities will need as modernized processing facilities as they transition to Regional Processing and Distribution Centers (RPDC) and Local Processing Centers (LPC).

In addition, your recommendation for the Senior Manager, Distribution Operations (SMDO) was to be earned 1 for every 5 Manager, Distribution Operations (MDO) and with the current requirement of a minimum of 800 function 1 craft employees in the facility. The Postal Service's proposal earns SMDOs with 300 total craft employees (collective of F1 and F3b).

There are 21 Lead Senior MDO EAS-26 authorized at major P&DCs and 43 Sr MDO EAS-25 authorized at all other senior P&DCs (total of 64) under the current criteria. This proposal authorizes SMDOs based on the level of plant and total number of MDOs earned. An estimated 115 facilities will earn a SMDO EAS-25 or EAS-26 in the future state.

We have considered your recommendations, evaluated the impact, and determined that we do not support the recommendations. We determined that the proposed ratio for SMDOs and the current ratios for MDOs and SDOs, that are unchanged with this proposal, to be effective. The Postal Service has decided to implement these changes, pursuant to Title 39 U.S. Code §1004, and as outlined in our July 5 correspondence. We are amenable to reviewing non-bargaining staffing ratios annually or sooner with you if you have questions.

We do not intend to implement the new plant raking and staffing criteria immediately. We intend to apply the new model to facilities as plant modernization is implemented and facilities are transitioned from P&DCs, NDCs, etc to an RPDC or LPC.

The network optimization will be ongoing over the next several years. Your organization will be notified in advance of the specifics of facility level impacts as we implement sites in this rolling implementation. Please contact Paulita Wimbush if you wish to discuss or if you have any questions.

Sincerely,



Bruce A. Nicholson  
Director,  
Labor Relations Policies and Programs