

Factfinding Proceedings Before
Susan E. Halperin (Chair), Joshua M. Javits, and Robert S. Hite

National Association of Postal Supervisors,

Petitioner,

v.

United States Postal Service,

Respondent.

**NATIONAL ASSOCIATION OF POSTAL SUPERVISORS’
POST-HEARING REPLY BRIEF**

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Introduction

In its Post-Hearing Brief, the Postal Service fails to establish that it (1) compensates its EAS employees comparably to comparable jobs in the private sector, (2) provides any pay differential (let alone a fair and reasonable differential) between thousands of its supervisors and the employees they supervise, or (3) pays sufficiently to attract and retain qualified employees, nor does it show that (4) the PFP system does anything other than undermine morale, (5) it was not required to consult with NAPS regarding all EAS employees, or (6) remedies should not be retroactive to compensate EAS employees for earnings they lost due to the Postal Service's noncompliance with the Postal Act's pay requirements throughout the period covered by this factfinding.

1. The Postal Service fails to establish that its compensation for EAS employees is comparable to their private-sector peers.

A. The Postal Service offers no evidence on comparable compensation (as opposed to salary), and offers only ineffective criticism of NAPS's evidence on the inadequacy of EAS compensation compared to the private sector.

In arguing that its compensation for EAS employees is comparable to private-sector compensation for comparable positions, the Postal Service relies solely on Mr. Handler's review of the average salaries that the Postal Service pays for eight positions compared to salary surveys for what he considered to be comparable positions.¹

A careful reading of Mr. Handler's testimony reveals that he never asserted that any EAS position's *compensation* (as opposed to salary) is comparable to comparable positions in the private sector. Yet the Postal Act requires comparable compensation, not just comparable salary.² The Postal Service ignores the fact that – as Mr. Handler admitted – private sector compensation consists of more than just salary, including bonuses of 7 to 10% of annual salary for comparable private-sector jobs.³ As discussed below, the Postal Service relies on the wrong comparator, and the correct comparator shows that postal benefits are almost identical to those of comparable private employers. The Postal Service also ignores Mr. Handler's concessions that, in the private sector, front-line supervisors are typically paid a differential of 15 to 20% more than the employees they supervise⁴ and that supervisors of union employees (i.e., supervisors with jobs comparable to EAS supervisors) are paid a premium of 15 to 20% over supervisors of non-union

¹ USPS Br. at 7-8. Notably, the Postal Service's brief spends just one page on the core issue of whether its compensation is comparable to comparable levels of work in the private sector.

² 39 U.S.C. § 1003(a) (the Postal Service shall “maintain compensation and benefits for all officers and employees on a standard of comparability to the compensation and benefits paid for comparable levels of work in the private sector of the economy”).

³ See Handler Test., Hrg. Day 2 Tr. 244-45 (Q: “[E]mployees at a typical private employer would get 7 to 10% bonuses in the private sector, correct?” A: “Correct.” . . . Q: “[W]ith respect to compensation you would agree that in order to benchmark against private compensation, we should increase somewhere between 5 to 10%, correct?” A: “There is that delta, yes.”).

⁴ *Id.* at 236.

employees.⁵ And the Postal Service ignores the fact (as Mr. Handler admitted and is discussed further below) that comparable private-sector positions in locations such as New York, Boston, and San Francisco are paid substantially more than the national average.

The Postal Service's post-hearing brief quotes Mr. Handler's testimony regarding the *average* difference between what he found to be the USPS average salary for employees in the eight jobs he evaluated and what he found to be market median salary, but it ignores the fact that, even according to Mr. Handler, USPS's average salary is less than the market median for three of the eight jobs.⁶ The Postal Service has made no effort to show that its compensation (or even its salaries) for the other approximately-1,000 EAS positions is comparable to private-sector compensation for comparable jobs.

The Postal Service also misleadingly quotes a Task Force Report that Mr. Handler never referenced, to the effect that "USPS employees enjoy a pay and benefits premium over their private sector counterparts."⁷ Nothing in that Task Force Report references EAS employees; rather, the employees with the "pay and benefits premium" are the 575,000 unionized employees above whom EAS employees are supposed to have an adequate pay differential.

The Postal Service criticizes the surveys that Dr. Risher used, but one of the two he used was by Willis Towers Watson, the same company that provided the survey data that Mr. Handler used for six of his comparator positions. The other survey on which he relied – by ERI – is used by federal agencies including the Internal Revenue Service and Office of Personnel Management, as well as by large companies, for salary benchmarking, and is, as Dr. Risher testified, one of the three surveys that are broadly based and national in scope and routinely used by salary comparability experts.⁸ While Mr. Handler criticized ERI's surveys for compiling multiple surveys into one, that is a standard technique; even Mr. Handler acknowledged that ERI was the primary survey to use to determine geographic differentials,⁹ and Mr. Handler's company, Aon, subscribes to ERI's surveys.¹⁰ Moreover, even if the ERI survey were stricken (other than for geographic disparities), the Willis Towers Watson survey on which Dr. Risher relied provides ample support for his conclusions.¹¹

⁵ *Id.* at 251. USPS mistakenly asserts that NAPS criticized Mr. Handler "for failing to limit his comparative analysis to large unionized employers." USPS Br. at 8 n.3. It did not. Rather, NAPS asked him whether private-sector employers pay a premium to supervisors of unionized employees, and he confirmed that they do.

⁶ The Postal Service misleadingly asserts that Mr. Handler "testified that the actual salaries of NAPS-represented employees are approximately 5.7% above market," USPS Br. at 7, citing Tr. Day 2 at 230 and summary chart, PS Ex. G2 at 36-37. However, as that summary chart makes clear, 5.7% is an *average* difference between the eight positions' cumulative average salaries and the cumulative market medians for those jobs, while, for three of those jobs, he determined that the USPS average is below the market median (reflected in a negative number in the far right-hand column). *See* NAPS Br. at 11 n.42.

⁷ USPS Br. at 8.

⁸ Risher Test., Hrg. Day 1 Tr. 256-57; email from ERI to Dr. Risher (Jan. 19, 2019), attached hereto as Ex. A.

⁹ Handler Test., Hrg. Day 2 Tr. 212.

¹⁰ Email from ERI, Ex. A.

¹¹ NAPS Br. at 11; Risher Test., Hrg. Day 1 Tr. 262-77; H. Risher, EA Market Comparability Analysis (Nov. 2018), NAPS Ex. 12, at 5-6

B. The Postal Service relies on the wrong comparator for the value of benefits.

The Postal Service argues that it provides a “substantial benefits premium” (PS Br. at 9-10), but in fact its benefits are no higher than the benefits that the private sector of the economy pays for comparable jobs. The Postal Service attempts to rely on Mr. Rand’s testimony that the average private sector job provides benefits that cost \$10.38 an hour, but that is the wrong comparator. The Postal Act calls for postal employees to receive “compensation and benefits . . . on a standard of comparability to the compensation and benefits paid for *comparable levels of work* in the private sector of the economy.” 39 U.S.C. § 1003(a). “Comparable levels of work” in the private sector is not the same as all private sector jobs – if it were, that phrase would have been omitted from Section 1003. As Mr. Rand acknowledged, the Bureau of Labor Statistics survey on which he relied includes millions of jobs at mom-and-pop establishments and other employers that provide no benefits at all.¹² The better comparator (though probably still too low) is the BLS survey for employers with 500 or more employees – which, as Mr. Rand acknowledged, provide benefits with an average cost of \$17.10 an hour – almost identical to the Postal Service’s \$17.44 an hour in benefits.¹³ If anything, the BLS “large employer” comparator is probably too low, both because its definition of large begins at 500 employees and because it includes companies (such as Walmart) with low or no benefits, while jobs comparable to the Postal Service’s almost universally provide good benefits (particularly jobs supervising unionized employees).

C. The Postal Service fails to demonstrate that it is not required to pay EAS employees in high-wage locations comparably to their private-sector peers.

While it argues that locality pay is not “universal,”¹⁴ the Postal Service does not and cannot dispute that comparable jobs in high-wage locations are paid substantially more than the national average, leaving EAS employees in those locations even farther behind the pay of comparable private-sector jobs. Its own expert admitted that, on average, comparable jobs in New York are paid 23% more than the national average, and he did not dispute Dr. Risher’s testimony that the vast majority of private companies with multiple locations (as well as the federal government) pay locality premiums.¹⁵

The Postal Service falls back on arguing that locality pay would be expensive and require time and resources to implement,¹⁶ but those are not valid reasons to ignore the law and pay EAS employees in high-wage localities less than their private-sector peers. To ease the calculation and

¹² Rand Test., Hrg. Day 2 Tr.271.

¹³ *Id.* at 273-75; BLS, “Employer Costs for Employee Comp., June 2018, NAPS Ex. 20, at 16.

¹⁴ USPS Br. at 12.

¹⁵ Handler Test., Hrg. Day 2 Tr. 243-44.

¹⁶ USPS Br. at 13. The Postal Service also selectively edits a quotation from Mr. Freeman’s opening in which he acknowledged that the Postal Act does not require locality pay, omitting the next sentence, in which he said that, as the Act requires that pay be comparable for employees in New York, D.C., and San Francisco, the only permissible alternative to locality pay would be to raise salaries nationwide and thus overpay in low-wage areas. *Id.*, citing Freeman Opening, Hrg. Day 1 Tr. 18-19.

cushion the blow, NAPS has suggested using federal GS locality adjustments and phasing them in over a few years.¹⁷

D. Increases to salary range minimums affect very few employees.

The Postal Service spotlights its increases to the minimum salaries in its salary ranges, but presents the data in a misleading fashion.¹⁸ First, very few EAS employees – only a total of 282 – are at the minimum of their salary ranges (far more – 3,925 – are at the maximum),¹⁹ so only a few are affected by the increased minimums. Second, the vast majority of EAS employees are Grades 15-18, for which the increases in minimum salaries are 0.4%, 0.3%, 4.5%, and 0.1% -- not very much. The higher increases in the minimum salaries for Grades 19-26 apply to far fewer employees. Thus, the Postal Service’s reliance on improvements to its minimum salaries is misplaced.

2. The Postal Service offers no evidence that it pays *any* salary differential at all to thousands of its supervisors.

The Postal Service relies heavily on the D.C. Circuit’s *NAPS v. USPS* decision, but ignores that decision’s holding that “the Postal Act does require Some differential, and requires that the differential be adequate and reasonable.”²⁰ Despite that requirement, the Postal Service has not disputed that, for thousands of EAS supervisors, there is *no* differential.

The 31,000 field EAS employees include over 13,000 Supervisors of Customer Services (SCS’s), of whom over 4,100 are paid at the Supervisor Differential Adjustment (SDA) minimum.²¹ As NAPS pointed out in its initial post-hearing brief, the base salary of over 105,000 City Carriers – Step O – is \$64,413, while the SDA minimum for Supervisors of Customer Services (the position that supervises all City Carriers) is just \$63,774.²² The Postal Service did not even attempt to demonstrate that the SDA for any of those 4,100 SCS’s provides a base salary that exceeds the base salary of the letter carriers he or she is supervising, nor that it provides SCS’s with a greater rate of pay than the carriers once overtime is considered.

The Postal Service attempts to justify this lack of a differential for the SCS’s by asserting that a few SCS’s do not supervise letter carriers,²³ but it admitted that a “large majority” of SCS’s do supervise letter carriers²⁴ – and provided no justification for why that large majority should not receive a pay differential over the carriers they supervise. It argues that “only 23%” of

¹⁷ NAPS Br. at 22.

¹⁸ See USPS Br. at 13-14.

¹⁹ Risher Test., Hrg. Day 1 at 280.

²⁰ 602 F.2d 420, 436 (D.C. Cir. 1979).

²¹ Occupation Codes Eligible for Supervisor Differential Adjustment (SDA) Effective Sept. 1, 2018, NAPS Ex. 14 (“Total # at SDA Minimum”: 4,119; “Total # Employees”: 13,010).

²² See NAPS Br. at 16; Letter Carrier Pay Schedule (11/24/2018), NAPS Ex. 21.

²³ USPS Br. at 19.

²⁴ Nicholson Test., Hrg. Day 2 Tr. 305.

field EAS employees make the SDA minimum²⁵ – as if it’s okay to violate the law if the violation only applies to 6,000 employees.

The Postal Service sets up and attacks a straw man – asserting that it would be too difficult to calculate whether there is a pay differential “on a supervisor by supervisor basis.”²⁶ But NAPS has never requested such a calculation and, in fact, specifically disclaimed it at the hearing.²⁷ The Postal Service offers no reason why it could not easily divide its SDA table (NAPS Ex. 14) into more than four categories to account for positions (by title/occupation code) that supervise clerk or carrier positions who are paid more (at their common top pay step) than the Level 6 Clerks, Step O on whom the SDA for the “All Other Eligible” position group is currently based.

The Postal Service also argues from irrelevant averages – for example that the “average total cash compensation of managers and supervisors exceeds that of bargaining unit employees”²⁸ – without offering any data on the distribution of EAS compensation compared to the distribution of bargaining unit compensation. While average EAS compensation may be higher, it has no bearing on the thousands of EAS employees who earn below the average, nor about what percentage of them earn less than the employees they supervise. As NAPS demonstrated, many thousands of Supervisors of Customer Services earned total cash compensation less than the median total cash compensation of bargaining unit workers they supervised.²⁹ The Postal Service offers no data to refute NAPS’s evidence that, with overtime, tens of thousands carriers and clerks earn substantially more than their supervisors (and substantially more than the current SDA minimum).³⁰ Despite having access to all relevant data, the Postal Service neither disputed those findings nor offered more specific data, thereby implying that more specific information would have revealed that far more supervisors and managers earned less than those they supervised.

As NAPS proposed, the solution to the lack of *any* differential in total cash compensation for thousands of EAS employees compared to the total compensation of the workers they supervise is to increase the SDA differential from 5% to 10%, as well as to calculate the SDA based on the appropriate benchmark for each position. The Postal Service mischaracterizes NAPS’s proposal as “establishing a differential based on total cash compensation” that would require supervisor-by-supervisor calculation.³¹ But NAPS’s proposal requires no such calculation. NAPS proposes to benchmark the differential for each EAS supervisory position on the base salary of the highest-paid craft position that that EAS position supervises and to provide for a differential sufficient to result in a large majority of supervisors earning a higher rate of pay than the workers they supervise – even after including the higher overtime rates that the workers

²⁵ USPS Br. at 20.

²⁶ *Id.* at 19.

²⁷ Wagner Test., Hrg. Day 2 Tr. 122-23 (the SDA “should be based off of the highest [paid] craft position supervised by the occupation code” and not on a supervisor-by-supervisor basis).

²⁸ USPS Br. at 20.

²⁹ *See* NAPS Br. at 17-18.

³⁰ *Id.* at 14.

³¹ USPS Br. at 19.

receive – by increasing the adjustment to 7% on top of each benchmark salary in 2018, to 9% in 2019, and 10% in 2020.³²

3. The Postal Service fails to establish that EAS pay suffices to attract and retain qualified employees.

The Postal Service erroneously asserts that NAPS presented no evidence that the Postal Service has difficulty filling its positions and that, when it does fill them, it often does so with poorly qualified non-career employees.³³ In fact, both Mr. Wagner and Ms. Brandt testified to that effect,³⁴ and no Postal Service witness testified to the contrary.

The Postal Service points to what it says is the relatively short time that EAS job postings stay open³⁵ – but at the hearing, it did not dispute that those statistics are manipulated or “managed” by taking down job postings and re-posting them.³⁶

In a footnote, the Postal Service erroneously asserts that “[t]he number of positions covered by the NAPS data [on the high quit rate among EAS employees hired from outside the Postal Service, NAPS Ex. 19] represents less than one-fifth of one percent of the total EAS complement.”³⁷ In fact, however, the “EAS Total” of positions reflected in Exhibit 19 is 2,361 external EAS hires from FY2012 through FY 2018 (almost 5% of the 49,000 total EAS employees; almost 7% if Postmasters, who are rarely hired from outside the Service, are excluded) of whom 547 (27% of the external hires, over 1% of the entire EAS workforce) had quit (and a considerably higher quit rate if employees in their first year or two are excluded). Even the smaller number of “Field EAS” hired externally in those years totals 719 – 2.3% of the 31,000 Field EAS employees – of whom 172 (24%) had quit.

Contrary to the Postal Service’s assertion,³⁸ Dr. Risher’s testimony that working for the Postal Service for an extended period taints an employee who seeks to transfer to the private sector in no way contradicts his testimony that pay for comparable jobs is less. Those two facts can and do co-exist.

The Postal Service also points to evidence that its workplace is less educated than average as justification for paying less for comparable jobs,³⁹ but if anything, that evidence indicates that it is failing to attract well-qualified employees.

³² Wagner Test., Hrg. Day 1 Tr. 122; NAPS Response to USPS FY 2016-2019 Proposals for EAS Pay Talks (11/3/17), NAPS Ex. 9D at 6.

³³ USPS Br. at 12 n.9.

³⁴ Wagner Test., Hrg. Day 1 Tr. 98; Brandt Test., Hrg. Day 1 Tr. 183. *See* NAPS Br. at 18-19.

³⁵ USPS Br. at 12.

³⁶ Park Test., Hrg. Day 2 Tr. 199.

³⁷ USPS Br. at 12 n.9.

³⁸ *Id.* at 9.

³⁹ *See* USPS Br. at 9 n.5.

4. The Postal Service ignores the impact of its PFP system on its morale.

The Postal Service hides its head in the sand with respect to the impact of its broken PFP system on its terrible morale and engagement. Nowhere in its post-hearing brief does the Postal Service acknowledge that, in five consecutive surveys, Gallup found its employee engagement levels to be in the first (worst) percentile of all U.S. companies.⁴⁰

The Postal Service points to Gallup's disclaimer that there is "no significant relationship between compensation and engagement or productivity."⁴¹ But it ignores the admission of its own Executive Director of Employee Engagement, Kelvin Williams, that there is a relationship between compensation and morale.⁴²

The Postal Service criticizes NAPS's witnesses' testimony regarding widespread dissatisfaction with the PFP system as "anecdotal,"⁴³ but the testimony offered by Mr. Wagner, Mr. Mooney, and Ms. Brandt (based on both their own experience and their widespread knowledge of other ES employees) and of Dr. Risher (based on his survey of EAS members) was convincing.⁴⁴ The Postal Service offered no evidence that Field EAS employees understand or are motivated by the 71 NPA/PFP factors and subfactors, nor did it undermine NAPS's contention that the end result of the PFP system – with 38% of EAS employees receiving no pay increases in 2019 (for FY 2018) – is both unfair and detrimental to EAS employees' already dismal morale.

5. The Postal Service cannot demonstrate that it (a) provided NAPS with the reasons for its decision nor (b) was not required to consult with NAPS regarding pay for all EAS employees (including so-called "Headquarters" and "Area" EAS).

The Postal Service makes no effort to dispute NAPS's assertion that it failed to provide NAPS with reasons for rejecting NAPS's proposals, as required by the statute.⁴⁵ (It lists dates of meetings and the ways in which it altered its proposal,⁴⁶ but offers no evidence of any reasoning that it shared with NAPS.)

To support its assertion that the panel's jurisdiction does not extend to making recommendations regarding the compensation for the 7,500 "Headquarters" and "Area" EAS

⁴⁰ The Postal Service misleadingly asserts that "Postal executive salary increases are based on PFP, just like the increases of Field EAS employees." USPS Br. at 24 n.13. In fact, however, the PFP system does *not* apply to the Postal Service's 40 top executives, who have received substantially larger raises than the EAS employees. Nickerson Test., Hrg. Day 2 Tr. 62-63 (pay increases for the "40 or so" executive officers, including COO David Williams, who received a 15% salary increase from 2015 to 2018, are set by the Board of Governors, not based on the NPA). PFP does apply to approximately 400 "Postal Career Executive Service" (PCES) employees whose positions lie between the EAS and senior executives, but PFP for PCES is calculated differently than for EAS, relying only on headquarters scores.

⁴¹ USPS Br. at 17.

⁴² Williams Test., Hrg. Day 2 Tr. 69.

⁴³ USPS Br. at 24.

⁴⁴ See NAPS Br. at 19-20.

⁴⁵ *Id.* at 20-21.

⁴⁶ USPS Br. at 3-4.

employees, the Postal Service quotes the Postal Act’s provision that “[t]he panel shall recommend standards for pay policies and schedules and fringe benefit programs affecting the members of the supervisors’ organization” PS Br. at 1-2 n.1, quoting 39 U.S.C. § 1004(f)(3)(A). But Headquarters and Area EAS employees *are* “members of the supervisors’ organization.” Ms. Brandt, for example, is an EAS Headquarters employee who belongs to NAPS.⁴⁷

The Postal Service does not dispute (or at least offers no argument against) NAPS’s assertion that, by its terms, the Act applies to *all* EAS employees, all of whom are “supervisory and other managerial personnel who are not subject to collective bargaining agreements.” 39 U.S.C. § 1004(b); *see* NAPS’s Post-Hr’g Br. at 21. The Postal Service points to a 1978 memorandum of understanding that it concedes expired in 1981. It misleadingly asserts that “the parties have continued to operate pursuant to” the terms of that MOU, ignoring the facts that (a) NAPS has, since at least 1992, asserted that it represents all EAS employees, and (b) the Postal Service has recognized NAPS as the representative of some Headquarters and Area employees.⁴⁸

The Postal Service did not make any different pay proposal regarding the Headquarters and Area EAS employees within the time required by 39 U.S.C. § 1004(e) (i.e., within 45 days of its agreement with the NALC in August 2017), and those employees are not represented by any other organization.

The Postal Act provides that, “[i]f . . . the supervisors’ organization believes that the decision of the Postal Service is not in accordance with the provisions of this title,” it may request factfinding. 39 U.S.C. § 1004(f)(1). That is what NAPS has done here, challenging, in part, the Postal Service’s failure to consult with NAPS regarding compensation for all EAS employees and the Postal Service’s purported limitation of its pay decision to “Field” EAS employees.

The Act further provides that “[t]he panel shall . . . make appropriate recommendations concerning the differences between the parties on such policies, schedules, and programs.” *Id.* § 1004(f)(3)(B). One of the differences between the parties is with respect to the compensation policies, schedules, and programs that apply to the Headquarters and Area EAS.

Accordingly, the panel should make clear that (a) its recommendations apply to all EAS employees and (b) in the future, the Postal Service should, as the Act requires, consult with NAPS regarding compensation policies, schedules, and programs relating to all EAS employees, including the approximately 7,500 “Headquarters” and “Area” EAS employees, all of whom are “supervisory and other managerial personnel who are not subject to collective bargaining agreements” under 39 U.S.C. § 1004(b).

⁴⁷ Brandt Test., Hrg. Day 1 Tr. 151, 167, 171.

⁴⁸ *See* NAPS Br. at 21.

6. Remedies should be retroactive to compensate for the delay in implementing the pay increases required by law, and they are not precluded by the Postal Service's finances.

The Postal Service argues against retroactive wage increases,⁴⁹ but it does not and cannot dispute that the pay package at issue is for Fiscal Years 2016-2019 – i.e., dating back to October 1, 2015. EAS employees should not be penalized for the Postal Service's long delay in offering, discussing, and finalizing this pay package.

It also pleads poverty as an excuse for not complying with the statutory requirements.⁵⁰ But it points to nothing in the law that excuses compliance based on fiscal difficulty. Nor does it dispute NAPS's evidence that compliance with those requirements will cost a tiny fraction of the increases the Postal Service granted its unions, and an even more miniscule fraction of its budget. While the Postal Service argues with Dr. Risher's expert opinion (and NAPS's assertion) that pay increases will pay for themselves,⁵¹ it offered no evidence to the contrary, and its own Executive Director of Employee Engagement agreed that employees' beliefs regarding whether they are paid fairly affects their morale, which in turn affects productivity, attendance, and customer satisfaction.⁵²

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⁴⁹ USPS Br. at 15.

⁵⁰ *Id.* at 25-26; *see* NAPS Br. at 8-9.

⁵¹ USPS Br. at 16-17.

⁵² Williams Test., Hrg. Day 2 Tr. 69-70.

Exhibit A

From: Zach Heyer <zach.heyer@erieri.com>
To: Howard Risher / h.risher@verizon.net <h.risher@verizon.net>
Sent: Sat, Jan 19, 2019 9:20 am
Subject: RE: I could use your help
Howard,

I can confirm that the IRS, DCAA, OPM, Mercer, Towers Watson and Aon all have current subscriptions with us.

If I can be of further assistance just let me know.

Regards,

Zach Heyer
ERI Economic Research Institute
949-706-8345x252
Zach.heyer@erieri.com

From: Howard Risher / h.risher@verizon.net <h.risher@verizon.net>
Sent: Friday, January 18, 2019 6:57 PM
To: Zach Heyer <zach.heyer@erieri.com>
Subject: I could use your help

The 'expert' for the USPS at a fact finding hearing -- a guy from Aon Hewitt -- claimed no reputable comp consultant would rely on ERI data.

I recall learning IRS and DCAA use ERI data. can you tell me if that's true? And if OPM subscribes? Other federal agencies? Maybe FDIC? Farm Credit?

Also confirm Willis Towers or Mercer subscribe?

Other major companies?

Thanks

Howard Risher
h.risher@verizon.net