



September 9, 2022

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

Dear Mr. Butts:

This is in response to the August 16 correspondences that you sent to Deputy Postmaster General and Chief Human Resources Officer Doug Tulino and Acting Vice President, Labor Relations Tom Blum concerning allegations that the Postal Service violated 39 U.S.C. § 1004(d)(1)(B) by not affording NAPS up to 60 days to review the proposed changes to the Field Maintenance department and posted Field Maintenance jobs in the new structure.

In addition, you provided the following to me on August 19 as supporting evidence that the Postal Service posted the proposed positions in Field Maintenance prior to NAPS providing its recommendations:

"This is a new job title with an expanded area of coverage from the old position title that is based on the redistricting. The prior position was titled; MGR FLD MAIN OPR LD This new position is titled; MGR FIELD MAINT OPRNS (LEAD). As I stated, the area of responsibility has also been changed and that reflects the new FMO staffing. The job posting is attached."

The Field Maintenance restructure proposal was sent to you on June 30. We called a meeting on July 6 and provided a briefing to you on the proposal. Upon the scheduling of this briefing for July 6, you stated that it was important to move this proposal quickly through the consultation process rather than wait a full 60 days to provide recommendations.

The proposal included the new positions and, specifically, the Manager, Field Operations (District), Occupation Code was among the list of proposed positions. The position, MGR, FIELD MAINT OPRNS (LEAD) 2355-0050 position that you referenced on August 19 is a current job and was posted under the current structure. The Field Maintenance restructure proposal has not been implemented.

Also included among your correspondence is an allegation that NAPS was not afforded the opportunity to submit 22 questions for USPS response. We have attached responses to the 22 questions that you submitted. The questions that are related to the non-bargaining positions, their duties and responsibilities and the proposed structure were discussed during the briefing on July 6.

I have restated those responses and are providing responses to all other questions that you submitted among your correspondence. Lastly, we still have not received any recommendations from you in response to the June 30 proposal.

Sincerely

Bruce A. Nicholson

Manager

Labor Relations Policy Administration

Enclosure

1. What is the methodology to determine the 1:16 ratio?

The current methodology for a Supervisor, Maintenance Operations (SMO) is authorized based on eWHEP maintenance craft complement – ratio 1:12 until 6 SMOs are earned, then a ratio of 1:20 for the remainder.

The 1:16 ratio that is proposed for the Supervisor, Field Maintenance Operations is based on craft on-rolls and was determined that this ratio provides a more balanced version of the current SMO criteria. This proposal authorizes at least one supervisor in each district.

2. What is the new structure going to look like and who does the FMO staff report to directly?

The Post Office Maintenance Ops organizational structure proposal was provided with the initial document submission. The Mgr. Field Maintenance Operations (District) will oversee the Supervisor, Field Maintenance Operations and bargaining unit personnel and report to the Mgr. Field Maintenance Operations (Area).

3. Are the current maintenance employees going to stay in maintenance for overall maintenance staffing calculations?

Maintenance craft employees will be moved to the new organizational structure.

4. Is there going to be a FMO supervisor and if so, is the position coming from current maintenance staffing?

A new supervisor job is being established and specific for Field Maintenance, the Supervisor, Field Maintenance Operations EAS-17. The position is not coming from current maintenance staffing. However, because maintenance craft employees are moving to the new organizational structure, we do anticipate a reduction of earned SMOs in the plant.

5. Where will this job be located? Will it domicile in the Plant or another location?

The Mgr Field Maintenance Operations (District) positions will be posted using the District Office address. Supervisor, Field Maintenance Operations positions may be strategically domiciled to support the service area. Postings and assignments for the non-bargaining positions will be in accordance with Handbook EL-312, *Employment and Placement*.

6. How would it work with us under the DM? Would be on the OPS/Retail side?

The new organizational structure does not report under the District Manager. This is a separate organizational structure that directly reports to the Vice President of Retail & Post Office Operations. This new structure has an area and district design that mimics the retail and delivery areas.

7. Would MOS Clerks still clear our paperwork and write work orders?

MOS Clerks will continue to provide support to FMO, including clearing paperwork and inputting work orders.

8. How will we monitor the work hours to ensure we have the proper staffing the next year?

The policy in which work hours are determined will be in accordance with the MS-45.

9. Who will we get our purchase cards from for our AMT's?

AMT's will continue to use purchase cards governed by the purchase card program and allocated to the appropriate finance number. The monthly review and reconciliation will be the responsibility of the district field maintenance manager.

10. What budget will we be given for procuring parts for repairs? Sometimes it's just a bolt that we need or \$2.00 part, we will still have the ability to use purchase cards to get these types of items for repairs.

There are currently no changes to existing processes for how we procure parts for repair.

11. We depend on the MOS department for stock parts, where will we get our stock parts

MOS Clerks will continue to maintain the inventory for stock parts. There are a variety of ways that stock parts are acquired and maintained for use by maintenance personnel. The FMO realignment is not intended to change the current processes.

12. Will offices that do not have a MOS Clerk get their own MOS Clerk?

MOS Clerks will continue to provide support to FMO, including clearing paperwork and inputting work orders.

13. NAPS also noticed on the proposal it showed BEM's and MM's, will the POMO have those employees as well?

Consistent with the 2014 BEM MOU and the 2018 MS-1 Agreement, Building Equipment Mechanics assigned to performing work at stations, branches, and associate offices, will be moved to the new structure – all others will remain in their current structure. Only Maintenance Mechanics earned in accordance with MS-45 staffing policies will be moved to the new organizational structure.

14. MMs are building mechanics by Occupation Code but in all plants, they are primarily used out on the floor, if they are to go with FMO, does that mean staffing in the plants is affected?

Only Maintenance Mechanics earned in accordance with MS-45 staffing policies will be moved to the new organizational structure.

15. BEM's work in the plants, does this mean they will now have two separate BEM's, those that are FMO and those that are plant only?

In accordance with the 2018 & 2019 MS-1 agreements "Maintenance work in stations and branches...will continue to be performed by employees currently performing those duties until adjustment occur resulting from attrition." Previous to the revision to the MS-1, the stations and branches were supported by the plant's maintenance personnel. Following the revision to the MS-1, the maintenance support for the stations and branches has been provided by the FMO, which includes usage of those BEMs who were currently performing those duties under the MS-1.

16. Many of the Stations and Branches no longer are maintained by the BEM's or they have AMT's who were once BEM's maintaining those offices depending on how that plant did their WHEP.

This is consistent with the 2018 & 2019 MS-1 agreements.

17. Custodians were mentioned as well, does this mean all the FMO's will need to complete the CTC training and be certified? If that is the case, what about our Area Field Maintenance Mgr., will they have the necessary CTC knowledge to understand how staffing is affected by the changes to the 4852's?

The new organizational structure will have sufficient EAS staffing that is qualified to support all necessary CTC workloading, and training for new and existing custodial staff in accordance with MS-47, TL-5.

18. Will the FMO Mgr. be responsible for training new custodians when they are hired? This training is done at the plant by MES or MMES or a custodial supervisor who has been to train the trainer courses - this will be required for all FMO and FMO supervisor's but where in the day will this training occur?

The new organizational structure will have sufficient EAS staffing that is qualified to support all necessary CTC workloading, and training for new and existing custodial staff in accordance with MS-47, TL-5.

19. The training for new custodians is two to three days, this may require two to three days away from the desk and the work that must be monitored, if the office doesn't qualify for a supervisor based on the formula mentioned in the Proposal. eMARS is the system used for tracking just about everything in Maintenance, will each unit have their own eMARS system for tracking purposes?

eMARS is not at the facility level, it is an enterprise system.

20. How will the CTC information that is downloaded to eMARS flow for the new proposed Post Office Maintenance Department? Currently only plants use this system but if the FMO is going to be responsible for custodial staff, how will we monitor and track that?

FMO will continue to use eMARS for daily work assignments and staffing information. At this time, we anticipate no change in the current process.

21. The level 19 support staff - why would the PO put a level 19 support staff in place while leaving a level 19 MFMO as well, the only thing that is different is the exempt status, which most work more than the 40 hours a week being on call 24/7 and don't get that extra time, why would they give the support staff level 19 instead of showing craft employees who get paid less and could save on putting up new positions?

The EAS-19 Retail & Post Office Operations Maintenance Support Specialist is a newly created role designed to support the field in receiving, tracking, and monitoring requests submitted. The organization determined that this is the appropriate classification and level for this work.

22. What exactly are these EAS-19, Retail & Post Office Operations Maintenance Support Specialist going to support the operation with?

The EAS-19 Retail & Post Office Operations Maintenance Support Specialist is a newly created role designed to support the field in receiving, tracking, and monitoring requests submitted. The job description was provided.