



March 22, 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 concerning the proposal you provided in response to an advanced release of a memorandum that was provided to NAPS announcing a minor revision to the Area of Consideration as found in Handbook EL-312, *Employment and Placement*, Section 743.13.

The Postal Service's restructuring modified reporting relationships in Retail and Delivery, Mail Processing and Logistics and the administrative functions. The established areas of consideration in Section 743.13 required modification to align with this structure. Therefore Section 743.131 was revised to ensure that, for example, a non-bargaining employee in Mail Processing, who was no longer assigned within a District, remained eligible to apply for a local vacancy.

You stated that you disagreed with the revisions to section 743.131 c, "The minimum area of consideration for Field vacancies is career non-bargaining employees within the District" however the only modification to that provision is to replace "District" with "Local."

NAPS claimed that to adhere to 39 U.S. Code § 1004(a), any job that needed to be reposted beyond the minimum area of consideration must be restricted to non-bargaining employees. NAPS's disagreement is with the long-standing policy of EL-312, Section 743.132, *Extending the Area of Consideration* and no changes were made to that policy.

NAPS is requesting to make changes to existing policy, and it can extend the duration of filling a vacant assignment. Section 743.132 expands the area of consideration and does not prohibit non-bargaining employees from applying for jobs. It also does not prohibit current non-bargaining employees from requesting noncompetitive voluntary lateral reassignments after a job is posted. Your request to modify provisions of EL-312, section 743.13 is not adopted.

Sincerely,

A handwritten signature in blue ink that reads "B. Nicholson".

Bruce A. Nicholson
Manager
Labor Relations Policy Administration