



American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

William Burrus
President
(202) 842-4246

Initiate National Dispute

December 16, 2008

Via Facsimile and First Class Mail

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Mr. Doug Tulino
Vice President, Labor Relations
U.S. Postal Service, Room 9014
475 L'Enfant Plaza
Washington, D.C. 20260

Re: APWU No. HQTG200819

Dear Mr. Tulino:

In accordance with the provisions of Article 15, Section 2 and 4, of the Collective Bargaining Agreement, the American Postal Workers Union is initiating a Step 4 dispute protesting the relocation and reassignment of employees through the two-tour initiative and related initiatives in violation of Article 12, Section 4, of the National Agreement.

Representatives of the union and postal management met at the national level on December 10, 2008, during which the employer provided the union a briefing on its two-tour operation initiative and the involvement of headquarters postal officials. The briefing, including USPS documents provided to the union, indicates that management has initiated a "major relocation of employees" through the two-tour operation initiative, reassigning a majority of day shift Tour 2 employees to other tours.

The major reduction and relocation of employees on Tour 2 is a significant change to the three-tour operation that has been in existence for over 200 years, with Tour 2 being the most sought after hours of work for the most senior employees.

Through the premature implementation of the program, APWU bargaining unit employees have been "relocated and reassigned" in violation of the "at least 90 day advance notice at the national level and 6 months at the Regional level" provisions required by the agreement.

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The union requests that all employees improperly reassigned be returned to their assignments and be made whole. In addition, notwithstanding the union's challenge to the elimination of Tour 2 in this or other forums, the union requests that no Tour 2 employees be reassigned to other Tours or duty assignments until the advance notice period has been satisfied.

Article 15 of the collective bargaining agreement provides that within thirty (30) days after the initiation of a dispute, the parties shall meet in an effort to define the precise issues involved, develop all necessary facts, and reach agreement. It is requested that you or your designee contact my office at 202-842-4250 to discuss this dispute at a mutually agree upon date and time.

Sincerely,



William Burrus
President

cc: Resident Officers

WB/bw
opeiu#2, afl-cio