



American Postal Workers Union, AFL-CIO

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July 13, 2001

Local President/Maintenance Craft Director

Dear Local President/Maintenance Craft Director:

In the past few years the Postal Service has begun to issue Maintenance Management Orders (MMO's) in which they identify a minimum skill level to perform specific tasks required during the performance of routine maintenance. The Union has appealed to arbitration every MMO issued which has been provided to us via the provisions of Article 19 of the National Agreement which improperly assigns tasks to the wrong Maintenance levels.

We also attempted to address this issue during contract negotiations but Postal Management refused to discuss the subject. We are fully aware this is an issue of great importance to our members and have been attempting to address it in every forum available to us. Everyone knows that it will probably be some time before these issues can be dealt with at national arbitration.

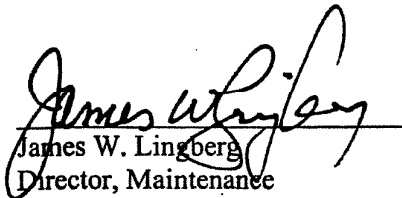
In order to provide guidance to the locals in processing grievances over the proper assignment of work on specific pieces of equipment, we have reviewed the MMO dealing with the ABC routes on the Delivery Bar Code Sorters (DBCS's) and determined the Union's position on which level Maintenance employee should be assigned to do which tasks. In making these adjustments we were guided by the job descriptions, the qualification standards, and by a series of Step 4 Decisions which indicate which work is appropriately assigned to which Maintenance level. In deciding the appropriate level we were assisted by Local Maintenance Directors Joseph Frega of Syracuse, New York and Gary Hamrick of West Palm Beach, Florida. Both of them are trained on, and work on, the equipment as Electronic Technicians. In addition, Joseph Frega is one of your National Staffing Advocates. We thank them for their efforts.


We are providing each local with the enclosed guidelines to utilize in documenting grievances over proper work assignments. It is imperative that each Steward files the necessary grievance based on these guidelines. When we are finally successful in national arbitration, it will be difficult to reconstruct payment for improper work assignments without grievance records as the Postal Service doesn't retain such records.

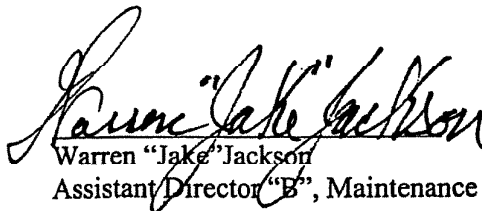
Essentially, our dispute revolves around efforts by the Postal Service to redefine job descriptions by pre-determining what level does what work. Their basis seems to be that the work is not difficult therefore a lower level employee can do the task. Unfortunately for them, arbitrators hold that work must be covered by a job description. Most, but not all, of the disputes revolve around the assignment of skilled work to Level 5 Mechanics. The Level 5 Maintenance Mechanic job description states that a level 5 "independently performs semiskilled preventive, corrective and predictive maintenance tasks. . .". Most of the tasks on DBCS routes require skilled determinations and are not appropriate for a level 5.

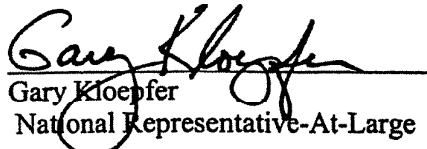
Please provide copies for your Shop Stewards to assist in policing the agreement.

Yours in union solidarity,


James W. Lingberg
Director, Maintenance


Bobby Donelson
Assistant Director "A", Maintenance


Warren "Jake" Jackson
Assistant Director "B", Maintenance


Gary Kloepfer
National Representative-At-Large

Enclosures

JWL/syi/opeiu#2/afl-cio

HISTORY

By letter dated June 22, 2000, the Postal Service notified the Union of its Draft Management Order (MMO) entitled, "PM Servicing Guidelines for Delivery Bar Code Sorter (DBCS) ElectroCom Automation (ECA) Model 994, 995, 996 and 998,. for "A", "B", and "C", file number M97129AG". The Postal Service attached no further explanation, clarification or documentation which supported the changes to the contents of the draft MMO.

The National Union filed an arbitration appeal based on the above draft MMO on July 6, 2000¹. In its appeal the Union challenged the designated level of employees as outlined in the draft MMO. By letter dated July 7, 2000, the Union issued its statement of issues and facts concerning its grievance. The following are the stated issues and facts:

1. Level 4 and 5 assignments/tasks are not within job descriptions.
2. The Union agreed to blow and go work only when MM5's were allowed to work on automated equipment.
3. Calibration or testing is skilled level work.
4. MM4's are not allowed in Bulk Mail Centers.
5. The USPS has failed to provide justification for the level of work or time involved in the proposed MMO.
6. USPS unilaterally changed the occupation group and level performing the task.
7. The USPS violated the 1998 Step 4 decisions on Level 5, 7 and 9 issues.

By letter dated August 2, 2000 the Postal Service again provided the Union with a Draft MMO entitled, "PM Servicing Guidelines for Delivery Bar Code Sorter (DBCS) ElectroCom Automation (ECA) Model 994, 995, 996 and 998,. for "A", "B", and "C", control number M00054AB. By letter dated September 13, 2000, the Union filed another arbitration appeal protesting the minimum levels as stated within the second draft MMO². On the same date, the Union issued its 15 day statement for its arbitration appeal³.

By letter dated October 12, 2000, the Postal Service denied the Union's grievance⁴. In its denial, the Postal Service stated its position as follows:

¹
APWU Grievance Number A19T200013

²
APWU Grievance Number N19T200018

³
APWU Notification Letter N19T200023

⁴
USPS Grievance Number Q98C-4Q-C-01002200

It is the Postal Service's position that the minimum skill level assigned to the tasks referenced by the APWU was determined using the standard position descriptions. Therefore, the work is assigned to the proper occupational group and level. The provided draft copy of the preventive maintenance guidelines identifies the maximum time that is required to perform each task as well as the minimum skill level determined for each task.

The task of developing these estimated guidelines is assigned to a group of subject matter experts in the area of equipment maintenance as well as skill requirements. The time required to perform each task is determined by the knowledge, experience and judgement of engineering analyst developing the requirements. Skill levels are identified using "Functional Purpose" and "Duties and Responsibilities" listed in the authorized maintenance craft position descriptions.

Checklists are reviewed periodically to verify the existence and status of equipment and the accuracy of estimated performance time. The review is performed by the Maintenance Technical Support Center utilizing national maintenance data, and adjustments are made accordingly.

The Postal Service did not attach any documents, clarification or studies to its denial letter.

On January 22, 2001, the Postal Service issued the final version of its draft MMO. The final MMO version was number as MMO-013-01 and titled, "PM Servicing Guidelines for Delivery Bar Code Sorter (DBCS) ElectroCom Automation (ECA) Model 994, 995, 996 and 998, for "A", "B", and "C", file number M00054AB." This MMO superceded all previous PM Servicing Guidelines for the DBCS Model 994, 995, 996 and 998 machines.

SUMMARY

It should be no surprise to each of you that the Postal Service, through the issuance of MMO-013-01, and similar MMO's, is continuing its assault on our wages and conditions of employment. The Postal Service has arbitrarily established three (3) different types of Preventive Maintenance Routes, minimum skill levels, maximum work hours, etc. At no time has the Postal Service provided the Union with any documents, etc. that it developed and/or relied upon to make the changes to its new DBCS MMO, (MMO-013-01).

The Postal Service by ignoring its recent Step 4 agreements, is attempting to diminish, if not extinguish, our Occupational Group lines. Its actions represent clear violations of our Collective Bargaining Agreement, specifically but not limited to Article 5, 7, 8, 19, 25 and 38. In response to this unholy attack, your National Union Officers have developed an avenue of protest within the grievance procedure. We brought in two Local Maintenance Craft Directors, Electronic Technician and National Staffing Advocate, Joe Frega of the Central New York Area Local and Electronic Technician Gary Hamrick of the Palm Beach Area Local were brought into our Headquarters for the purpose of researching and developing a position paper for each **DBCS route, Route A, B or C**, as well as each task contained within each route. Joe and Gary, in addition to being Electronic Technicians, are the Maintenance Craft Directors for their respective Locals and are highly respected by their peers because of their knowledge and experience as Electronic Technicians and Union Officers. They developed a comprehensive packet designed to assist each Local with the filing of grievance(s) when local management makes assignments that cross occupational groups or prevent our Maintenance members from using the necessary amount of time to perform the PM tasks identified in MMO-013-01.

Coupled with the excellent work of Joe and Gary is a grievance guide that you can tailor to your Local. We ask that you use these documents when filing the necessary grievances protesting management's improper assignment of work. These documents, plus the documentation that you must acquire at your level (work assignment records, OTDL's, detailed employee statements describing the exact work assignment under protest, etc) will not only assist your National Business Agent successfully resolve your grievance, but your grievances will also be of great benefit to our National level grievance(s).

ISSUE

Did the Postal Service violate the Agreement by making an assignment(s) across occupational group lines and/or across levels and if so, what is the appropriate remedy?

FACTS

On _____ employee _____ a level _____ of the Maintenance Craft with the occupational group classification number _____ spent _____ hours working as a level _____, occupational group classification number _____. Specifically they performed the following task(s) which are not within their skill level and/or Standard Position description:

_____ The completion of these task(s) required the skill level of the Standard Position _____ of which there were sufficient number of employees within this Occupational Group and Skill Level available and qualified to perform the work in dispute.

Articles Violated, but not limited to: 5, 7, 8, 19, and 38.

REMEDY

The grievant shall be compensated at the higher level rate of pay of _____. The employee within the proper Occupational Group and Skill level that should have performed the task shall be compensate at the appropriate overtime rate due to management's improper work assignment.

INCLUDE AS EVIDENCE OF THE VIOLATION:

1. Proof of the work performed, e.g. copy of the completed Work Order, signed-off Preventive maintenance route, etc.
2. A detailed statement from the employee that performed the work **describing their decisions making steps they to diagnose the machine malfunction⁵ during either the completion of a PM route and/or while performing corrective maintenance**, to include parts installed, tools used, skills needed to complete the task,
3. The OTDL for the both occupational groups in dispute,
4. The work loads for each occupational group. This is needed to establish a “heavy” workload and a “light” workload.
5. Any 1723's that may have been completed,
6. Any other information that demonstrates the improper work assignment.

POSITION

Article 7 Section 2.B provides:

In the event of insufficient work on any particular day or days in a full-time or part-time employee's own scheduled assignment, management may assign the employee to any available work in the same wage level for which the employee is qualified, consistent with employee's knowledge and experience, in order to maintain the number of work hour of the employee's basic work schedule.

Article 7 Section 2.C provides:

During exceptionally heavy workload periods for one occupational group employees in an occupational group experiencing a light workload period may be assigned to work in the same wage level, commensurate with their capabilities, to the heavy workload area for such time as management determines necessary.

Article 38 Section 2.C defines a Duty Assignment as:

A set of duties and responsibilities within a recognized occupational group and level regularly scheduled during specific hours of duty.

Article 38 Section 2.G defines an Occupational Group as:

In the Maintenance Craft, occupational group shall be determined by position designation and level.

Whenever the Service makes assignments across crafts, occupational groups or levels without meeting the stringent requirements imposed upon them by Article 7, they run

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Any task requiring a judgement is a skilled task, e.g. if the task requires a judgement that a belt has excessive wear, skill is necessary to determine “excessive”. Therefore this task requires skills greater than the semi-skilled level found in the Level 5 Maintenance Mechanic Standard Position Description.

the risk of obligating themselves for both the payment of higher level and the payment of overtime to the effected employees. Arbitrators at both the national and regional level have expressed views on what constitutes a violation of Article 7 with the final analysis being that to assign work across different levels, OR different occupational groups OR different CRAFTS is an equal violation of the agreement. "OR" is the key word. If the word "and" were used in place of "or" the Union would not be pursuing this issue today. These Arbitrators, both National and Regional have found the appropriate penalty to be the payment of overtime to the level, group or CRAFT person who would have worked had the work been properly assigned.

Such assignments can not be made to increase efficiency or to avoid the payment of overtime. Therefore the affected employee(s) are to be paid overtime for the work they would have performed if not for the violation of the agreement 14 days back from the date of infraction and for as far into the future as the violation continues.

The language of Article 7 Section 2 A is clear, when the Service combines work in different crafts, or occupational groups, or levels, except for the severely limited conditions set forth in Article 7.2.A, 1 and 2, 7.2.B and/or C, such action violates the provisions of the Agreement between the parties respective to any such assignment(s).

Several arbitrators have addressed this issue:

National Arbitrator Richard I. Bloch in case **A8-W-0656** makes clear that there are "limited circumstances wherein the inherent proscription against crossing craft lines is inapplicable." He addresses the language of "insufficient work" in conjunction with "exceptionally heavy work " and makes the determination that the two things must happen simultaneously. On page 6 of his award he provides:

"There is no reason to find that the parties intended to give Management discretion to schedule across craft lines merely to maximize efficient personnel usage; this is not what the parties have bargained. That an assignment across craft lines might enable Management to avoid overtime in another group for example, is not, by itself, a contractually sound reason. It must be shown either that there was "insufficient work" for the classification or, alternatively, that work was "exceptionally heavy" in one occupational group and light, as well as, in another."

Further, at page 7 he states,

"Under the circumstances, there having been a crossing of craft lines, it is appropriate that Management provide justification for the action."

And at pages 10 and 11,

"In this case, the evidence relevant to this particular fact situation fails to sustain Management's responsibility of showing "insufficient" work in the letter carrier unit."

Obviously the same responsibility is incumbent upon Management in regards to "exceptionally heavy work".

National Arbitrator Richard Mittenthal in case **H8C-2F-C-7406** provides on page 5:

"The principle seems clear. Where Management makes a cross-craft assignment, it must justify that assignment under the terms of VII-2-B or VII-2-C. If no such justification is provided, the cross-craft assignment is improper under the "inherent proscription..." in VII-2. The Postal Service does not claim Arbitrator Bloch's interpretation is incorrect. It has not asked me to modify or overrule his award."

Arbitrator James P. Martin in **C1T-4C-C-25924/25/26228** writes of pages 6 and 7 of his award respective to National Arbitrator Bloch's award, supra and a similar award by National Arbitrator Mittenthal:

"...the National Panel Arbitrators found that Management did not have the right to use Article 7, Section 2 to avoid overtime, or to increase the efficient utilization of employees by violating it. While the specific factual situations handled by those Arbitrators concerned the crossing of craft lines, the language which they interpreted simply cannot be read in anyway except to include all three elements set out in the first paragraph of Article 7.2A."

Arbitrator James P. Martin also found in **C4T-4H-C-9446** on pages 8 and 9:

"If read by itself, Article 25.4 certainly appears to justify the assignment made by Management. The question presented, and the only one, is whether Article 7.2 is an restriction on the rights of Management under Article 25.4. In National Arbitration A8-E-1157 Mittenthal quoting Bloch, the finding was made that Article 7.2 B & C are the only justification for violating the proscription in Article 7.2. That award refers to cross-craft assignment, but it is obvious that cross occupational group assignment is concluded, because of the first sentence of Article 7.2A, "Normally, work in different crafts, occupational groups or levels will not be combined into one job, " and the reference in C to occupational groups."

Arbitrator Robert W. McAllister in **C4T-4K-C-4832** on page 8 of his decision fully supports National Arbitrators Bloch and Mittenthal as well as Regional Arbitrator Martin and in addition addresses the issue of "Maintenance Coverage" respective to a USPS letter dated December 6, 1983 and to quote:

"From the above, it is evident the Postal Service endorses the concept that its best interests are served when properly qualified maintenance employees are scheduled to work during regularly scheduled tours of mail processing equipment operation."

Arbitrator Linda DiLeone Klein in **C4T-4J-C-38251** on pages 5 and 6, referencing National Arbitrator Bloch and Regional Arbitrators Martin and McAllister states:

"The conclusion to be drawn therefrom is that Article 7, Section 2 applies to situations involving assignments across craft lines as well as those encompassing different

occupational groups or levels.",

Again at page 5 and continuing onto page 6, referencing National Arbitrator Bloch:

"he also found that the parties did not intend to give Management discretion to cross craft lines to "maximize efficient employee usage....."; "There was no showing of insufficient work in the MPE classification and there was no showing of an exceptionally heavy workload in the BEM occupational group with a simultaneous light work load in the MPE occupational group. The criteria for crossing occupational groups was not met."

Arbitrator Walter H. Powell in **E7T-2M-C-31897** on page 11 and continuing onto page 12 provides,

"There are significant ambiguities and generalizations in the respective job descriptions which permit some laxity and leniency in drawing hard and fast skill lines between the respective job levels. However, a close examination of the description of the lower level jobs in each case require direction and supervision. Much of the planning on the jobs that were done, was done by the employees themselves."

Arbitrator Edmund W. Schedler in **S7T-3F-C-3496/3497**, on page 11 of his award provides:

"Yes, the Employer violated the National Agreement when management assigned General Mechanics to install lock boxes at Maynardville, Tennessee and a counter line at Alcoa, Tennessee"

Arbitrator Charles Krider, in case **I90T-1I-C-94018084**, in adopting the rational of National Arbitrator Bloch, states on page 9:

"There is no exception in Article 7.2 for cross occupational assignments that increase efficiency."

Arbitrator Krider continues on page 9:

"The Postal Service has argued that the Union failed to show the specific dates and times of the alleged violations. Such specific facts are not required in this case since Management has agreed that it has regularly assigned BEMs to repair letter boxes."

My specific holding, therefore, is that Management did violate Article 7, Section 2 of the National Agreement by making assignments across occupational lines when it regularly assigned BEMs to repair letter boxes in the field when there was no emergency."

Arbitrator I.B. Helburn, in case **G90T-4G-C-93031662**, also ruled the Postal Service violated the National Agreement by making a higher level assignment in order to avoid the payment of overtime. On page 12 the arbitrator provides:

Article 25.4 does not prevail in the case at bar. Article 7.2 controls in temporary cross-occupational group upgrades. And, Management made no argument that the dictates of Article 7.2 B or C were met before Parrott was upgraded. While he may have been upgraded to provide valuable experience, it is also true that the action avoided the need to call ET, Level 9s on overtime. While it may have been more efficient to upgrade Parrott, such an

action is precluded by the Bloch award noted above.

Arbitrator Linda DiLeone Klein, in case **I90T-11-C-94039154**, ruled that downloading of sort schemes by a General Expediter in lieu of a level 9 Electronic Technician violated the National Agreement as this work was not in the General Expediter's position description.

The evidence shows that management made a cross occupation group assignment in violation of Article 7 of the Agreement. They have not shown a light or nonexistent work load for the _____ and an "EXCEPTIONALLY HEAVY WORKLOAD" existed for the _____ as required by Article 7 Section 2.B and C. It is requested that the employee(s) involved be paid higher level pay for the performance of the higher level work and overtime to those employees deprived of the work opportunity they lost when other employee(s) performed work within their occupational group and/or level.

CASE NUMBER	ARBITRATOR	LOCATION	DATE OF AWARD	ISSUE
H8S-5F-C-8027	Richard I. Bloch	National Level	7-Apr-82	Level 5 PTF Clerk Assigned to Level 5 Special Delivery Craft Work
H8C-2F-C-7406	Richard Mittenenthal	National Level	23-Aug-82	Level 4 Mail Handler Assigned to Level 5 Distribution Clerk Work
C1T-4C-C-25924	James P. Martin	Minneapolis Minnesota Bulk Mail Center	28-Jan-85	Level 7 MPE Assigned to Level 7 BEM Work
C4T-4K-C-4832	Robert W. McAllister	St. Louis Missouri BMC	7-Apr-86	Level 7 MPE Assigned to Level 9 ET Work
C4T-4K-C-9083	Robert W. McAllister	Mid Missouri GMF	29-May-86	Level 9 Electronic Technician Assigned to Level 1 Cleaner Work
C4T-4H-C-6129	James P. Martin	Kansas City, Kansas	5-Jun-86	Level 3 Custodian Assigned Level 5 Tool and Parts Clerk Work
C4T-4H-C-9446	James P. Martin	Topeka, Kansas	24-Oct-86	Level 6 Engineman Assigned to Level 9 ET Work
C4T-4G-C-18108	Albert A. Epstein	Indianapolis, Indiana	6-Apr-87	Level 5 Tool and Parts Clerk Assigned Level 5 Maint. Control Clerk Work
C4T-4J-C-38251	Linda DiLeone Klein	Milwaukee, Wisconsin	9-Jan-89	Level 7 MPE Assigned to Level 7 BEM Work
S4T-3C-C-57197	Edmund W. Schedler Jr.	Memphis Tennessee	7-Jul-89	Level 6 Blacksmith Welder Assigned Level 7 MPE Work
E4T-2L-C-48275	Linda DiLeone Klein	Columbus, Ohio	1-Sep-89	Level 3 Custodian Assigned Level 4 & 5 MM, Level 6 & 7 MPE Work
E7T-2L-C-16543	Linda DiLeone Klein	Toledo, Ohio	11-Sep-89	Level 3 Custodian Assigned Level 6 Painter Work
S4T-3E-C-17905	Ernest E. Marlatt	Atlanta, Georgia	30-Apr-90	Level 6 MPE Assigned to Level 9 ET Work
E7T-2M-C-31857	Walter H. Powell	Clarksburg, West Virginia	12-Dec-90	Level 5 General Mechanic Assigned to Level 8 AMT Work
I90T-1I-C-94018084	Charles E. Kridler	Kansas City, Missouri	20-Jan-95	Level 7 BEM's Assigned to Level 6 Letter Box Mechanic Work
J90T-1J-C-95002391	Edwin H. Benn	Palatine, Illinois	10-Jun-95	Level 7 MPE Assigned to Level 9 ET Work
E7T-2B-C-34464	Jacquelin F. Drucker	Southeastern, Pennsylvania	17-Jul-96	Level 5 Maintenance Mechanic Assigned to Level 3 Custodial Work
C90T-1C-C-94014122	Fred Blackwell	Pittsburgh, Pennsylvania	21-Jan-97	Level 7 BEM Assigned to Level 7 MPE Work
D94T-1D-C-96026985	Elliot Newman	Clarksburg, West Virginia	28-Oct-97	Level 5 Maintenance Mechanic Assigned to Level 3 Work
G90T-4G-C-95064160	I. B. Helbaum	Wichita Falls, Texas	1-Nov-97	Level 3 Custodian Assigned Level 7 MPE Work
I90T-1I-C-95035336	Edwin H. Benn	Milwaukee, Wisconsin	10-Dec-97	Level 4 Maintenance Mechanic Assigned to Level 7 MPE Work
H4T-1H-C-99034523	Linda S. Byars	Macon, Georgia	7-Apr-00	Level 5 MM's Assigned Level 5 MM Work in Another Facility
H98T-1H-C-99150971	Mark I. Lurie	Ft. Lauderdale, Florida	11-May-00	Level 7 MPE Assigned Level 9 Electronic Technician Work
D98T-1D-C-99208125	Irving N. Tienen	Greenville South Carolina	4-Apr-01	Level 7 MPE Assigned Level 9 Electronic Technician Task - Downloading Sort Plans on DBCS
I90C-1I-C-94039153	Linda Klein	Waterloo, Iowa	3/23/95	Level 5 Clerk Assigned Level 9 Electronic Technician Task - Downloading Data
J94T-1J-C-96044839	Jonathan Dworkin	South Bend, Indiana	3/11/97	Level 5 Clerk Assigned Level 9 Electronic Technician Task - Downloading Data
W0T-5R-C-1223	Kenneth M. McCaffree	Spokane, Washington	11/6/93	Level 7 MPE Assigned Level 9 Electronic Technician Task - Software Upgrade
I90T-1I-C-95034027	Robert W. McAllister	Kansas City, Missouri	1/8/01	Level 5 Maint. Control Clerk Assigned Level 5 Tool and Parts Clerk Tasks

**The following represents the specific contentions involved in
MMO-013-01, previously released as Draft MMO, file code
M0054AB, (ABC Routes).**

The Union contentions are specific and are as follows:

1. **Violations of Article 5:** The Unions' contention is that when management unilaterally assigned work by minimum skill level in a manner which is not consistent with the Standard Position Description or Qualification Standards for the positions as stated and thereby impacted the working conditions of a significant number of bargaining unit employees, it has violated Article 5 of The Collective Bargaining Agreement by failing to negotiate the issue in advance. The referenced MMO also states the it ". . . reflects the maximum work hours required to maintain the equipment." This statement impacts the bargaining unit in that it establishes working hours and conditions not previously in existence. Previous MMO's reflected an estimated time for equipment maintenance staffing needs.
2. **Violations of Article 7.2:** Article 7.2. "A. Normally work in different crafts, occupational groups or levels will not be combined into one job." It is the Unions' contention that the MMO does in fact combine the duties of the Level 5 Maintenance Mechanic with the duties of the Level 7 MPE Mechanic by its failure to provide adequate instruction by written media to allow the work to be within the Standard Position Description of the Maintenance Mechanic, Level 5. The Union also contends that the duties described in the checklist require "knowledge of mail processing equipment" for their performance and thereby are duties which are appropriately assigned to the Level 7 (reference KSA #7). The Union also contends that the MMO combines the duties and qualification standards of the Level 7 MPE Mechanic with the duties and qualification standards of the Level 9 Electronic Technician by assigning duties requiring advanced technical analysis to the Level 7 MPE Mechanic (e.g. test deck).
Violations of Article 7, Step 4 sign-offs: (reference C94T-4C-C-98023460 on page 32 of Level 5, 7, 9 Issues). This agreement relates all issues on the CSBCS sign-off to the DBCS as it applies to the Maintenance Craft (dated 9-25-98). Specifically, items 3 & 4 of the CSBCS agreement refer to the appropriate Standard Position Description, and Level 7 MPE Mechanic hours (dated 6-27-96). The Union contends that MMO-013-01 violates this agreement by assigning the described tasks to Level 5 in the Maintenance Craft.
3. **Violations of Article 19:** Those parts of all handbooks, manuals and published regulations of the Postal Service, that directly relate to wages, hours or working conditions, as they apply to employees covered by this agreement,
The Union contends violations of the MS-63, Maintenance Operations Support: Section 423.1, by combining different skill levels on one checklist. The MS-63, Maintenance Operations Support: Section 515.57, by not assigning employees with an understanding of the equipment and the ability to diagnose malfunctions. EL-201, Standard Position Descriptions is violated by assignment of tasks to other than the correct occupational group. EL-303 is violated in much the same manner. Violations of Article 19 also include MMO-013-01 in its inappropriate assignment of tasks to level 5:7 as described in the text that follows, by task.

MMO-013-01
Route: 03-DBCS-CB-10M (“A” Daily)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7⁶	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application⁷, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions providing disassembly, cleaning procedures and reassembly of the items listed. As such, this step requires a thorough knowledge of the operating mechanisms of the ECA DBCS.
#5	Minimum skill level 7	As written, this step lacks clearly written instructions providing methods, materials and hazards involved.
#6	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods, materials, and hazards associated with the cleaning.
#7	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic mechanisms, specifically power supply and light barriers.

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Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

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The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-10M (“A” Daily)

#8	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic components of the ECA-DBCS, specifically cabling being disturbed during chassis cleaning.
#9	Minimum skill level 7	As written, this step does not provide clearly written instruction specifying the procedures, methods, and hazards (if any) in performing a proper mail search and the procedures for returning mail to operations.
#10	Minimum skill level 7	Requires a thorough knowledge of the mechanical, electric, and electronic components of the ECA-DBCS. Requires performance of a more difficult maintenance task involving adjustments.
#11	Minimum skill level 7	As written, this step does not provide clearly written instruction on procedures to properly close the doors and panels ensuring all interlock and identified equipment hazards. Requires knowledge of ECA-DBCS electronics and operation to provide proper operation upon powering up.
#12	Minimum skill level 5	There is no challenge to this step as written.
#13	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application⁸, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS. In addition, this step, as written, does not provide for returning the equipment to operating condition.

8

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-10M ("A" Daily)

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| #14 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By running the "W" module test deck in the designated sort plan and reviewing and analyzing operational reports generated by this procedure to prevent equipment or systems deterioration. |
| #15 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route: DBCS-CB-102M (“A” Weekly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7⁹	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹⁰, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#5	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#6	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.

9

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

10

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: DBCS-CB-102M (“A” Weekly)

#7	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically Certified Mail Detector (CMD).
#9	Minimum skill level 5	There is no challenge to this step as written.
#10	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning.
#11	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning. Specifically, knowledge of label printers.
#12	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#13	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#14	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#15	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#16	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.

MMO-013-01
Route: DBCS-CB-102M (“A” Weekly)

#17	Minimum skill level 5	There is no challenge to this step as written
#18	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹¹, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#19	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the performance of complex adjustments of the feeder and its associated mechanisms.
#20	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the performance of the maintenance for the label printer.
#21	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of the maintenance on the equipment, requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#22	Minimum skill level 9	This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the WABCR Level 9 work is performed..
#23	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of the maintenance on the equipment, requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.

11

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: DBCS-CB-102M ("A" Weekly)

#24

**Minimum skill level
as determined by step
in which deficiency
was found, Level 5,7, or 9.**

**The Union does not dispute the clean-up portion of
this step. However, reporting of the equipment
deficiencies requires a thorough knowledge of the
ECA-DBCS to initiate a final operational check and
determine deficiencies.**

MMO-013-01
Route: 03-DBCS-CB-103M (“A” Monthly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7¹²	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹³, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#5	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#6	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#7	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.

¹²

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

¹³

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-103M (“A” Monthly)

#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#9	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#10	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning of power supplies.
#11	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.
#12	Minimum skill level 5	There is no challenge to this step as written.
#13	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application ¹⁴ , specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#14	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the operational characteristics of the stop line. At least one employee with a minimum skill level 7 is needed for this 2 man operation.
#15	Minimum skill level 9	There is no challenge to this step as written

14

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01

Route: 03-DBCS-CB-103M (“A” Monthly)

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| #16 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the Certified Mail Detector (CMD). |
| #17 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route: 03-DBCS-CB-201M (“B” Daily)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7¹⁵	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹⁶, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions providing disassembly, cleaning procedures and reassembly of the items listed. As such, this step requires a thorough knowledge of the operating mechanisms of the ECA DBCS.
#5	Minimum skill level 7	As written, this step lacks clearly written instructions providing methods, materials and hazards involved.
#6	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods, materials, and hazards associated with the cleaning.
#7	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic mechanisms, specifically power supply and light barriers.

¹⁵

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

¹⁶

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-201M (“B” Daily)

#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically system computer and WABCR.
#9	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#10	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#11	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#12	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#13	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically Certified Mail Detector (CMD).
#14	Minimum skill level 5	There is no challenge to this step as written.
#15	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning.
#16	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning. Specifically, knowledge of label printers.

MMO-013-01
Route: 03-DBCS-CB-201M (“B” Daily)

#17	Minimum skill level 7	Requires a thorough knowledge of the mechanical, electric, and electronic components of the ECA-DBCS. Requires performance of a more difficult maintenance task involving inspection and replacement.
#18	Minimum skill level 7	As written, this step does not provide clearly written instruction on procedures to properly close the doors and panels ensuring all interlock and identified equipment hazards.
#19	Minimum skill level 5	There is no challenge to this step as written.
#20	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹⁷, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS. In addition, this step, as written, does not provide for returning the equipment to operating condition.
#21	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, knowledge of proper label printer operation.
#22	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and also performs operational checks requiring a thorough knowledge of the ECA DBCS.
#23	Minimum skill level 9	This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the WABCR.

17

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-201M (“B” Daily)

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| #24 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By running the “W” module test deck in the designated sort plan and reviewing and analyzing operational reports generated by this procedure to prevent equipment or systems deterioration. |
| #25 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route: 03-DBCS-CB-202M (“B” Daily)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7¹⁸	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application¹⁹, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions providing disassembly, cleaning procedures and reassembly of the items listed. As such, this step requires a thorough knowledge of the operating mechanisms of the ECA DBCS.
#5	Minimum skill level 7	As written, this step lacks clearly written instructions providing methods, materials and hazards involved.
#6	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods, materials, and hazards associated with the cleaning.
#7	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic mechanisms, specifically power supply and light.

18

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

19

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-202M (“B” Daily)

#8	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic components of the ECA-DBCS, specifically cabling being disturbed during chassis cleaning.
#9	Minimum skill level 7	As written, this step does not provide clearly written instruction specifying the procedures, methods, and hazards (if any) in performing a proper mail search and the procedures for returning mail to operations.
#10	Minimum skill level 7	Requires a thorough knowledge of the mechanical, electric, and electronic components of the ECA-DBCS. Requires performance of a more difficult maintenance task involving adjustments.
#11	Minimum skill level 7	As written, this step does not provide clearly written instruction on procedures to properly close the doors and panels ensuring all interlock and identified equipment hazards. Requires knowledge of ECA-DBCS electronics and operation to provide proper operation upon powering up.
#12	Minimum skill level 5	There is no challenge to this step as written.
#13	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²⁰, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS. In addition, this step, as written, does not provide for returning the equipment to operating condition.

20

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-202M (“B” Daily)

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| #14 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By running the “W” module test deck in the designated sort plan and reviewing and analyzing operational reports generated by this procedure to prevent equipment or systems deterioration. |
| #15 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route 03-DBCS-CB-203M ("B" Weekly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7²¹	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²², specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#5	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#6	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#7	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.

21

Whenever the phrase, "Minimum Skill Level 7" is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

22

The "Log off and shutdown" task may be performed by the Level 7 MPE Mechanic only when the task is "menu driven". If this the performance of this task is not "menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route 03-DBCS-CB-203M (“B” Weekly)

#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.
#9	Minimum skill level 5	There is no challenge to this step as written
#10	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²³, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#11	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the performance of complex adjustments of the feeder and its associated mechanisms.
#12	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of the equipment, requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#13	Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9.	The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies.

23

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-204M (“B” Monthly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7²⁴	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²⁵, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#5	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#6	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#7	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.

²⁴

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

²⁵

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-204M (“B” Monthly)

#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#9	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#10	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning of power supplies.
#11	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.
#12	Minimum skill level 5	There is no challenge to this step as written.
#13	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#14	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²⁶, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#15	Minimum skill level 9	There is no challenge to this step as written

MMO-013-01
Route: 03-DBCS-CB-204M ("B" Monthly)

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| #16 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the CMD. |
| #17 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route: 03-DBCS-CB-301M (“C” Daily)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7²⁷	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²⁸, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions providing disassembly, cleaning procedures and reassembly of the items listed. As such, this step requires a thorough knowledge of the operating mechanisms of the ECA DBCS.
#5	Minimum skill level 7	As written, this step lacks clearly written instructions providing methods, materials and hazards involved.
#6	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods, materials, and hazards associated with the cleaning.
#7	Minimum skill level 7	As written, this step lacks clearly written instructions providing the cleaning methods, materials and hazards involved. Further, this step requires a thorough knowledge of the electrical & electronic mechanisms, specifically power supply and light.

²⁷

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

²⁸

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

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#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically system computer and WABCR.
#9	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#10	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#11	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#12	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically WABCR.
#13	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step requires a thorough knowledge of the operating mechanisms of the ECA DBCS, specifically CMD.
#14	Minimum skill level 5	There is no challenge to this step as written.
#15	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning.
#16	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, the cleaning methods and materials associated with the cleaning. Specifically, knowledge of label printers.

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#17	Minimum skill level 7	Requires a thorough knowledge of the mechanical, electric, and electronic components of the ECA-DBCS. Requires performance of a more difficult maintenance task involving inspection and replacement.
#18	Minimum skill level 7	As written, this step does not provide clearly written instruction on procedures to properly close the doors and panels ensuring all interlock and identified equipment hazards.
#19	Minimum skill level 5	There is no challenge to this step as written.
#20	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application²⁹, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS. In addition, this step, as written, does not provide for returning the equipment to operating condition.
#21	Minimum skill level 7	As written, this step lacks clearly written instructions, specifically, knowledge of proper label printer operation.
#22	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and also performs operational checks requiring a thorough knowledge of the ECA DBCS.
#23	Minimum skill level 9	This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the WABCR.

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The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

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| #24 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By running the “W” module test deck in the designated sort plan and reviewing and analyzing operational reports generated by this procedure to prevent equipment or systems deterioration. |
| #25 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |

MMO-013-01
Route: 03-DBCS-CB-302M (“C” Weekly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7³⁰	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application³¹, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#5	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#6	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.
#7	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of, and inspection of belts etc.

³⁰

Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

³¹

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

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Route: 03-DBCS-CB-302M (“C” Weekly)

#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.
#9	Minimum skill level 5	There is no challenge to this step as written
#10	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application³², specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#11	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the performance of complex adjustments of the feeder and its associated mechanisms.
#12	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of the equipment, requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#13	Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9.	The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies.

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The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

MMO-013-01
Route: 03-DBCS-CB-303M (“C” Monthly)

<u>STEP</u>	<u>APWU POSITION</u>	<u>REASON</u>
#1	Should be Level 5,7,9	All safety trained Maint. Personnel are capable of determining simple safety deficiencies (e.g. broken E-stop wires)
#2	Minimum skill level 7³³	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application³⁴, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#3	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be removed, doors opened, and the potential hazards present in the areas.
#4	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#5	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#6	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#7	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.

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Whenever the phrase, “Minimum Skill Level 7” is used it is understood that this task falls within the Position Description of the Level 9 Electronic Technician as well.

³⁴

The “Log off and shutdown” task may be performed by the Level 7 MPE Mechanic only when the task is “menu driven”. If this the performance of this task is not “menu driven, then the minimum skill level is that of a Level 9 Electrician.

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#8	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#9	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning.
#10	Minimum skill level 7	As written, this step is broad based, generalized and non specific due to the lack of clearly written instructions. This step specifically lacks the cleaning methods and materials associated with the cleaning of power supplies.
#11	Minimum skill level 7	As written, this step is broad based, generalized and non specific in the clarity of instruction of the specific panels to be reinstalled, and or closed, and the potential hazards present in the areas.
#12	Minimum skill level 5	There is no challenge to this step as written.
#13	Minimum skill level 7	Level PS-07 MPE performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically the performance of logoff/lockout/tagout procedures, by menu driven application³⁵, specific to the equipment requiring a thorough knowledge of the operating mechanisms of the ECA DBCS.
#14	Minimum skill level 7	Level PS-07 performs preventative maintenance inspections of mail processing equipment and performs complex maintenance work. Specifically, the operational characteristics of the stop line. At least one employee with a minimum skill level 7 is needed for this 2 man operation.
#15	Minimum skill level 9	There is no challenge to this step as written

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| #16 | Minimum skill level 9 | This step requires the PS-09 ET to apply advanced technical knowledge, complex testing, diagnosis, maintenance, alignments and calibrations necessary to ensure maximum system performance. By performing complex calibration, testing and analysis of the CMD. |
| #17 | Minimum skill level as determined by step in which deficiency was found, Level 5,7, or 9. | The Union does not dispute the clean-up portion of this step. However, reporting of the equipment deficiencies requires a thorough knowledge of the ECA-DBCS to initiate a final operational check and determine deficiencies. |