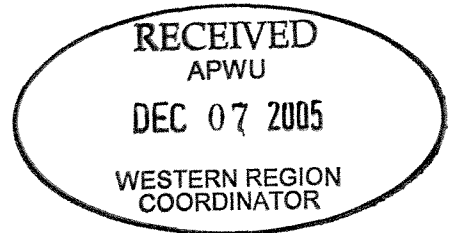


HUMAN RESOURCES
WESTERN AREA



December 2, 2005

Omar M. Gonzalez
Western Regional Coordinator
APWU, AFL-CIO
1799 Old Bay Shore HWY, STE 240
Burlingame, CA 94010-1377



Re: Notice of Withholding - Olympia, WA

Dear Mr. Gonzalez:

Please be advised that based on the Area Mail Processing Plan, previously provided to you, it will be necessary to excess 6 level PS-5 clerks, 1 level PS-11 electronic technician, 1 level PS-6 mail processing equipment mechanic, and 1 level PS-3 custodial laborer from the Olympia, WA P&DC. The Seattle Performance Cluster is authorized to withhold 12 full-time regular positions level PS-11 and below in the clerk, maintenance, mail handler, and letter carrier crafts within a 50 mile radius of Olympia.

If you have any questions, please contact Dan L. Foster, Labor Relations Specialist at 303-313-5702.

Sincerely,

for
Patricia D. McGinty
Manager Human Resources
Western Area

To: NBA(s) *Dunn/Bairn/Shepard*
 FOR YOUR INFORMATION
 Please review and take action
 Please make your arb. selections

Iman
OMAR M. GONZALEZ
COORDINATOR

12/7/05
DATE

*Check figures
stats &
inform me
of concerns.
ASAP!
Today preferably!*

cc: Manager Labor Relations Western Area
Manager In-Plant Support Western Area
District Manager Seattle
Director NPMHU Western Region
National Business Agent NALC Region 2

Attachment: Site Impact Report

TO: *Clint Bureson*

DATE: *12/7/05*

- For your information
- Please review & take action
- As Requested
- Reduce issues to writing and submit ASAP! if any.
- Comments:

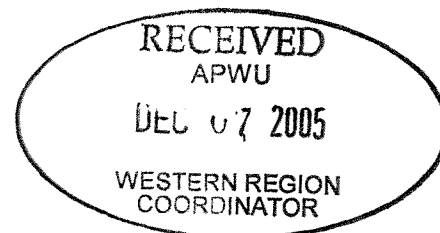
OMAR M. GONZALEZ, COORDINATOR

HUMAN RESOURCES
WESTERN AREA



December 7, 2005

Omar M. Gonzalez
Western Regional Coordinator
APWU, AFL-CIO
1799 Old Bay Shore HWY, STE 240
Burlingame, CA 94010-1377



Re: Notice of Withholding – Olympia, WA - Correction

Dear Mr. Gonzalez:

Please note the following correction to the December 2, 2005 notice below. The MPE level should be noted as level PS-5.

Please be advised that based on the Area Mail Processing Plan, previously provided to you, it will be necessary to excess 6 level PS-5 clerks, 1 level PS-11 electronic technician, 1 level PS-6 mail processing equipment mechanic, and 1 level PS-3 custodial laborer from the Olympia, WA P&DC. The Seattle Performance Cluster is authorized to withhold 12 full-time regular positions level PS-11 and below in the clerk, maintenance, mail handler, and letter carrier crafts within a 50 mile radius of Olympia.

If you have any questions, please contact Dan L. Foster, Labor Relations Specialist at 303-313-5702.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Foster".

for
Patricia D. McGinty
Manager Human Resources
Western Area

cc: Manager Labor Relations Western Area
Manager In-Plant Support Western Area
Manager Maintenance Support Western Area
District Manager Seattle
Director NPMHU Western Region
National Business Agent NALC Region

Olympia P&DF Clerk Workhour Impact Report

Impacted Installation OLYMPIA P&DF

Installation Address 717 76th Ave SW, Olympia WA 98501-9991

Area Name Western

Impact Type Outgoing AMP

Anticipate Date of Impact 04/01/2006

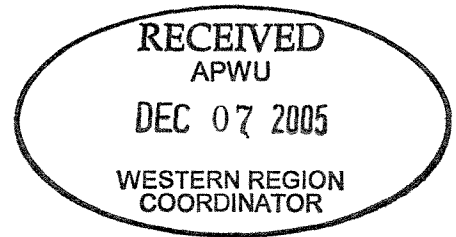
Period (Dates) of Review Performed 9/25/2004 Thru 9/30/2005

Report Prepared By Kevin Smith & Jack Kunitsugu

Report Prepared Date **11/30/2005**

Phone(360) 704-4855 & (253) 471-6010

Reviewed By Richard Loar



Olympia P&DF Clerk Workhour Impact Report

	A Current Average Weekly Hrs	B Planned Weekly Hrs	C Weekly Hrs Savings	D Monthly Savings (C*4)	E Annual Work Hours Savings (C*52)	F Annual FTE Savings (E / G)	G Current FTE Yearly Hour Rate
OLYMPIA P&DF	2,515	2,226	-289	-1,156	-15,028	-8	1768
Total	2,515	2,226	-289	-1,156	-15,028	-8	1,768

OverTime Impact

	Current OT Average Weekly Hrs	Current OT Rate	Planned OT per Week from changes	Additional Planned OT per Week	Percent Planned OT per Week	Planned OT Hours per Week	Planned OT Rate
OLYMPIA P&DF	167	6.6%	± -19	± 0	± 0.0	148	6.6%
Total	167	6.6%	-19	0		148	6.6%

Olympia P&DF Clerk Workhour Impact Report

Casuals

Page 2 of 4

a. Current Number of Clerk Casuals on Rolls	2
b. Current Total Non-OverTime Clerk Casuals Hours per Month	128
c. Planned Reduction in Total Non-OverTime Clerk Casuals Hours per Month	0
d. Number of Clerk Casuals that will have Reduced Hours	0
e. Number of Clerk Casuals that will be Terminated	-2
f. Number of Clerk Casuals Remaining After Impact	0
g. Provide Narrative Justifying need for Remaining Clerk Casuals	

OLYMPIA P&DF - AMP Outgoing Operations to Tacoma P&DC.

Part Time Flexible (PTFs)

a. Current Number of Clerk PTFs on Rolls	14
b. Current Total Non-OverTime Clerk PTFs Hours per Month	148
c. Planned Reduction in Total Non-OverTime Clerk PTFs Hours per Month	0
d. Number of Clerk PTFs that will have Reduced Hours	0
e. Number of Complement Change in Clerk PTFs	1

Olympia P&DF Clerk Workhour Impact Report

Part Time Regular (PTRs)

Page 3 of 4

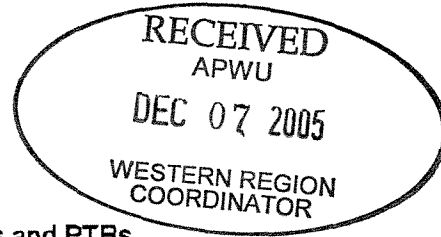
- | | |
|---|----|
| a. Current Number of Clerk PTRs on Rolls | 0 |
| b. Planned Number of Clerk PTR Positions after Impact | 0 |
| c. Estimated Number of Clerk PTR Attrition | 0 |
| d. Will there be any Clerk PTRs Excessed from Craft or Installation | NO |
| If Yes how Many Clerk PTRs | 0 |
| e. Provide Narrative Explaining need for Excessing | |

Full Time Regular (FTRs)

- | | |
|---|-----|
| a. Current Number of Clerk FTRs on Rolls | 57 |
| b. Planned Number of Clerk FTR Positions after Impact | 51 |
| c. Estimated Number of Clerk FTR Attrition | 0 |
| d. Will there be any Clerk FTRs Excessed from Craft or Installation | YES |
| If Yes how Many Clerk FTRs | 6 |
| e. Describe Withholding Area Within Miles Around your Installation | 50 |
| f. Provide Narrative Explaining need for Excessing | |

OLYMPIA P&DF - AMP Outgoing Operations to Tacoma P&DC. The 6 full time positions will be absorbed into the 985 Customer Service Area and through attrition.

Olympia P&DF Clerk Workhour Impact Report



Page 4 of 4

Preliminary Summary

a. Total Planned Non-OT Reduction per Month for Regulars and PTRs	
b. Planned Reduction in Total OT Hours per Month	-76
c. Planned Reduction in Casual Non-OT Hours per Month	0
d. Planned Reduction in PTF Non-OT Hours per Month	0
e. Total Planned Non-OT Hours per Month	8,312
f. Total FTE Savings	-8

Notes:

The number of positions reduced was changed from the AMP Model because the current compliment has changed.

AMP model shows

full time clerks: current 58 and proposed 51 clerks.

PTF Clerks: current 13 and proposed 15

reduction of 7 full time clerks and addition of 2 PTF clerks.

The actual current compliment (as of 11/18/2005) was

Full time: current 57 clerks

PTF: Current 14 clerks

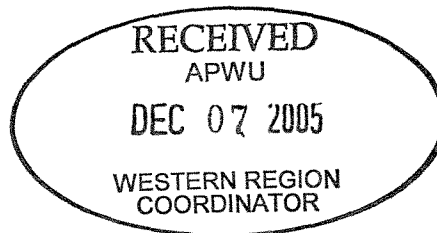
This would mean a reduction of 6 full time clerks to bring the compliment to the proposed 51 clerks and increase of 1 PTF to bring the compliment to 15 PTF clerks..

Olympia P&DF Maintenance Craft Workhour Impact Report

Impacted Installation OLYMPIA P&DF

Installation Address 717 76th Ave SW, Olympia WA 98501-9991

Area Name Western



Impact Type Outgoing AMP

Anticipate Date of Impact 04/01/2006

Period (Dates) of Review Performed 9/25/2004 Thru 9/30/2005

Report Prepared By Kevin Smith & Jack Kunitsugu

Report Prepared Date 11/30/2005

Phone (360) 704-4855 & (253) 471-6010

Reviewed By Richard Loar

Olympia P&DF Maintenance Craft Workhour Impact Report

	A Current Average Weekly Hrs	B Planned Weekly Hrs	C Weekly Hrs Savings	D Monthly Savings (C*4)	E Annual Work Hours Savings (C*52)	F Annual FTE Savings (E / G)	G Current FTE Yearly Hour Rate
OLYMPIA P&DF	933	822	-111	-444	-5,772	-3	1872
Total	933	822	-111	-444	-5,772	-3	1,872

OverTime Impact

	Current OT Average Weekly Hrs	Current OT Rate	Planned OT per Week from changes	Additional Planned OT per Week	Percent Planned OT per Week	Planned OT Hours per Week	Planned OT Rate
OLYMPIA P&DF	22	2.4%	± -3	± 0	± 0.0	19	2.3%
Total	22	2.4%	-3	0		19	2.3%

Olympia P&DF Maintenance Craft Workhour Impact Report

Casuals

Page 2 of 4

a. Current Number of Maintenance Casuals on Rolls	0
b. Current Total Non-OverTime Maintenance Casuals Hours per Month	0
c. Planned Reduction in Total Non-OverTime Maintenance Casuals Hours per Month	0
d. Number of Maintenance Casuals that will have Reduced Hours	0
e. Number of Maintenance Casuals that will be Terminated	0
f. Number of Maintenance Casuals Remaining After Impact	0
g. Provide Narrative Justifying need for Remaining Maintenance Casuals	

Part Time Flexible (PTFs)

a. Current Number of Maintenance PTFs on Rolls	0
b. Current Total Non-OverTime Maintenance PTFs Hours per Month	
c. Planned Reduction in Total Non-OverTime Maintenance PTFs Hours per Month	0
d. Number of Maintenance PTFs that will have Reduced Hours	0
e. Number of Complement Change in Maintenance PTFs	0

Olympia P&DF Maintenance Craft Workhour Impact Report

Part Time Regular (PTRs)

Page 3 of 4

a. Current Number of Maintenance PTRs on Rolls	0
b. Planned Number of Maintenance PTR Positions after Impact	0
c. Estimated Number of Maintenance PTR Attrition	0
d. Will there be any Maintenance PTRs Excessed from Craft or Installation	NO
If Yes how Many Maintenance PTRs	0
e. Provide Narrative Explaining need for Excessing	

Full Time Regular (FTRs)

a. Current Number of Maintenance FTRs on Rolls	27
b. Planned Number of Maintenance FTR Positions after Impact	24
c. Estimated Number of Maintenance FTR Attrition	0
d. Will there be any Maintenance FTRs Excessed from Craft or Installation	YES
If Yes how Many Maintenance FTRs	3
e. Describe Withholding Area Within Miles Around your Installation	50
f. Provide Narrative Explaining need for Excessing	

OLYMPIA P&DF - AMP Outgoing Operations to Tacoma P&DC. Excessed positions are one ET, one MPE and one Custodial. Three areas are available for placement within 50 miles: Tacoma P&DC, South Sound DDC and Seattle BMC.

Olympia P&DF Maintenance Craft Workhour Impact Report

Preliminary Summary

a. Total Planned Non-OT Reduction per Month for Regulars and PTRs	
b. Planned Reduction in Total OT Hours per Month	-12
c. Planned Reduction in Casual Non-OT Hours per Month	0
d. Planned Reduction in PTF Non-OT Hours per Month	0
e. Total Planned Non-OT Hours per Month	3,212
f. Total FTE Savings	-3

**AREA LEVEL
STEP 3 APPEAL**

**AMERICAN POSTAL WORKERS UNION, AFL-CIO
WESTERN REGION**

ISSUE: OPERATIONS TRANSFER(AMP)	LOCATION /DISTRICT WESTERN AREA	AREA GRIEVANCE NUMBER OG-001WA-05	REGIONAL GRIEVANCE NUMBER
CRAFT: ALL	DATE APPEALED TO STEP 3 11-28-05	FROM : OMAR M. GONZALEZ, COORDINATOR	FILED VIA: <input type="checkbox"/> FAX @ CERT.NO.7004-2510-2474-7176

THIS GRIEVANCE IS BEING APPEALED TO STEP 3 ON: 11-28-05

TO:

GRIEVANCE/ARBITRATION PROCESSING CENTER
UNITED STATES POSTAL SERVICE [] PACIFIC [X] WESTERN AREA
1745 Stout Street
Denver, CO 80299

[] ATTACHMENTS

[X] DOCUMENT(S)
REQUESTED

This appeal is filed pursuant to Article 15.2(step 3)(f) of the National Agreement concerning policies, instructions, and/or guidelines changed by the Western Area and alleging a violation of, but not limited to, (Art.3,5,12,17, 31,19,37,38,39 of CBA and JCIM), ELM, PO-408 and other applicable handbooks/manuals.

On or about November 18, 2005 the Regional APWU received a non response from Dan L. Foster replying to the Regional Office's 11-10-05 request for information related to an AMP study and proposed transfer of all originating operations from the Olympia P&DC for Zip Code 985 to the Tacoma P&DC. The Area has changed the CBA/ JCIM in regards to principles of seniority/Reassignment.

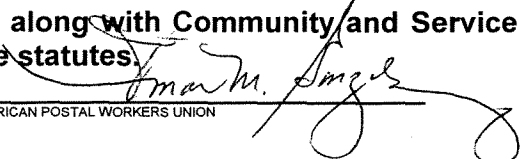
In essence Foster's response does not provide the information requested. Foster alludes that the failure to finalize an effective date allows for the details of transitioning mail and employee impact to be undetermined. Article 12 requires notification to the Region in the form of a Manpower Impact Report along with a Regional meeting as soon as practicable. The AMP study/report will result in reassignments of employees. This was clearly stated by the Employer notice letter.

The AMP report/study specified a projected savings of \$1,179,768. A reported target date of May 2006 has been indicated. According to the Employer affected employees may be reassigned out of the Installation.

The Regional Union requested the AMP study which appears to be flawed. The Union also requested all attachments which were not sent. The Site Impact Statement was also not provided. A meeting has not been scheduled. The Employer has no valid reason showing it is now impossible to issue the Impact Statement and meet with the Regional Office. On information and belief assignments have not been properly withheld.

Such impact on employees requires a plan. If the Western Area is, as Mr. Foster declares, still reviewing the details on mail transitioning and the number of employees to be impacted a month after the Area VP signed off on the data, then the AMP report proffered to USPS HQ and supposedly approved on October 28, 2005 by HQ is flawed.

The Union requests that no employee in Olympia be reassigned involuntarily and the Employer provide all requested and relevant information to properly enforce the CBA. The Union also requests validation of the data thus far released to the Union along with Community and Service impacts. The Union also requests USPS abide by the applicable statutes.


FOR THE AMERICAN POSTAL WORKERS UNION

Area Mail Processing

Consolidated Office Name/ZIP Code: Olympia P&DF
 AMPC Facility Name/ZIP Code: Tacoma P&DC
 Type Distribution: Originating

Approving Signatures

AMP Origination

<p>Postmaster(s)/Manager <small>(Manager responsible for processing offices from which mail is consolidated)</small></p> <p>District Manager, Customer Services <small>(District from which mail is consolidated if different from AMPF)</small></p> <p>Plant Manager, P&D Center <small>(Plant that will receive the mail)</small></p> <p>District Manager, Customer Services <small>(District from which mail is consolidated)</small></p> <p>Senior Plant Manager <small>(Manager responsible for the offices that will receive the mail)</small></p>	<p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p><i>[Signature]</i></p> <p><i>[Signature]</i></p> <p><i>[Signature]</i></p> <p><i>[Signature]</i></p> <p><i>[Signature]</i></p>	<p>Date: <u>10-21-05</u></p> <p>Date: _____</p> <p>Date: <u>10-21-05</u></p> <p>Date: <u>OCT 21 2005</u></p> <p>Date: <u>10-21-2005</u></p>
--	--	---	---

Area Office

Vice President, Area Operations _____ Date: 10/24/05

Headquarters

Senior Vice President, Operations _____ Date: _____

Implementation Date: _____

Reason for disapproval:

 (Signature) (Title) (Date)

10/12/2006

Impact On Craft Personnel

10/12/06

Consolidated Office Staffing							
Consolidated Office Name/ZIP Code: <u>Olympia P&DF 98501-9991</u>							
Craft	Noncareer		PTFs		Career		
	Current	Proposed	Current	Proposed	Current	Proposed	
Clerk	5	0	13	15	58	51	
Mail Processor	0	0	0	0	0	0	
Mail Handler	3	0	2	2	33	29	
ET	0	0	0	0	9	8	
MPE	0	0	0	0	5	4	
Custodial	0	0	0	0	9	8	
Other	0	0	0	0	4	4	
Total	8	0	15	17	118	104	
	(A)	(B)	(C)	(D)	(E)	(F)	
Total Current (A)+(C)+(E):		141		Total Proposed (B)+(D)+(F):		121	
		(G)				(H)	
Difference (+/-) at Consolidated Office (H-G):				-20			
				(X)			

Note 11
Note 11
Note 11

AMPC Office Staffing							
AMPC Facility Name/ZIP Code: <u>Tacoma P&DC 98413</u>							
Craft	Noncareer		PTFs		Career		
	Current	Proposed	Current	Proposed	Current	Proposed	
Clerk	0	0	0	9	174	174	
Mail Processor	0	0	0	0	0	0	
Mail Handler	0	0	5	11	74	74	
ET	0	0	0	0	16	16	
MPE	0	0	0	0	21	21	
Custodial	0	0	0	0	25	25	
Other	2	2	3	3	25	25	
Total	2	2	8	23	335	335	
	(J)	(K)	(L)	(M)	(N)	(O)	
Total Current (J)+(L)+(N):		345		Total Proposed (K)+(M)+(O):		360	
		(P)				(Q)	
Difference (+/-) at AMPC Facility (Q-P):				15			
				(Y)			
Total Personnel Impact (X+Y):				-5			

Service Commitments

Explain in detail any downgrades to services for other mail classes:

Customer comments (Express, Priority, and 2C only):

No Change

Distribution Changes

DMM Labeling List L002 - 3 Digit ZIP Code Prefix Matrix			
3-Digit ZIP	Column A - Label to	Column B - Label to	Column C - Label to
	No Change		

DMM Labeling List L005 - 3-Digit ZIP Code Prefix Groups - SCF Sortation	
Column A - 3-Digit ZIP group	Column B - Label to
No Change	

10/12/06

Remote Encoding Center Operations

Annual Image Processing Savings/Cost

Consolidated Office Name: Olympia P&DF
 Associated REC Name (Letters/Flats): S: Lake City REC
 Associated REC Name (APPS): n
 Associated REC Name (PARS): n

AMPC Facility Name: Tacoma P&DC
 Associated REC Name (Letters/Flats): Glendale REC
 Associated REC Name (APPS): n/a
 Associated REC Name (PARS): n/a

(1) LDC	(2) Operation Number	(3) Reduced REC Annual Image Volume (000)	(4) Reduced REC Annual Workhours	(5) Reduced REC Annual Cost (A)
10	770			
10	927			
15	081			
15	082			
15	387			
15	388			
15	389			
15	775	4,653,923.0	5,600	\$119,904.32
15	779			
TOTAL				

(6) LDC	(7) Operation Number	(8) Increased REC Annual Image Volume (000)	(9) Increased REC Annual Workhours	(10) Increased REC Annual Cost (B)
10	770			
10	927			
15	081			
15	082			
15	387			
15	388			
15	389			
15	775	4,653,923.0	5,648	\$120,922.93
15	779			
TOTAL				

Annual REC Cost Changes>> (B-A) \$1,018.60

Equipment Reconfigurations

Consolidated Office Reductions

Equipment Description	Upgrade Type and/or Quantity
ICU Hardware (NIP,NOP,....)	No Change
Contractor Costs	No Change
0200	No Change
RCR	No Change
T1 Lines	No Change
FIRES/FRES	No Change
APPS Servers	
PARS Servers	
Other -	
C CERTIFIED MTSC COST	_____
D CONTRACTOR COST	_____

AMPC Facility Additions

Equipment Description	Upgrade Type and/or Quantity
ICU Hardware (NIP,NOP,....)	No Change
Contractor Costs	No Change
0200	No Change
RCR	No Change
T1 Lines	No Change
FIRES/FRES	No Change
APPS Servers	
PARS Servers	
Other -	
C CERTIFIED MTSC COST	_____
D CONTRACTOR COST	_____

Associated Office Reductions

Equipment Description	Upgrade Type and/or Quantity
IPU Hardware (NIP,NOP,....)	
Contractor Costs	move Consoles, IPU's
VDTs	
VDT Trunks	
FIRES/FRES	
APPS Servers and VDTs	
PARS Servers and VDTs	
Other -	
C CERTIFIED MTSC COST	_____
D CONTRACTOR COST	_____

Associated REC Additions

Equipment Description	Upgrade Type and/or Quantity
IPU Hardware (NIP,NOP,....)	
Contractor Costs	Install IPU, Add Partitions
VDTs	
VDT Trunks	
FIRES/FRES	
APPS Servers and VDTs	
PARS Servers and VDTs	
Other -	
C CERTIFIED MTSC COST	_____
D CONTRACTOR COST	_____

One Time Equipment Configuration Change Costs>> TOTAL C & D

10/12/06

CC: Vice President Headquarters Labor Relations
Vice President Western Area Operations
Manager Labor Relations Western Area
Manager Operations Support Western Area
Manager In-Plant Support Western Area
Manager Delivery Programs Western Area
Manager Distribution Networks Western Area
Manager Marketing Western Area
Manager Public Affairs & Communications Western Area
District Manager Seattle, WA
Senior Plant Manager Seattle, WA
Manager Human Resources Seattle, WA