

ADDITIONS AND CORRECTIONS

Grievant: Richard Kriss
Grievance # 55-06-SMS18
Completion of 8190: 10-11-06
Additions and Corrections: 10-12-06
Appeal to Step B: 10-12-06

Management wrote in their contentions that the District Manager implemented a Window of Operations on June 23, 2006. This is false. In fact, our local has won hundreds and hundreds of grievances concerning Article 8 Section 5G since that date paying the ODL's 12 hours and paying escalating remedies to the NON-ODL's (see the Union's packet and other packets recently sent to Step B.)

Management wrote in their contentions that Derwood has achieved a 99.6% year to date percentage of routes completed by 1700. Management provided no documentation to substantiate that claim, thus, the Step B team should give no consideration to this assertion whatsoever.

Management wrote in their contentions on page 2 that the APWU has signed agreements where management may work NON-ODL employees overtime without working ODL employees to 12 hours. This should be given no consideration because the APWU doesn't represent City Letter Carriers.

Management wrote in their contentions on page 5 that management does not have to pay for violations of Article 8.5.C.2. This grievance is about a violation of Article 8 Section 5G. Therefore, the Step B team should give no consideration to this management assertion whatsoever. In fact, the Union is submitting hundreds of settlements (see other packets recently sent to Step B) and many are precedent setting Step B decisions, where penalty pay was paid to the ODL's and escalating

remedies were paid to the NON-ODL's for violations of Article 8 Section 5G.

Management wrote in their contentions that all Derwood Carriers must be back by 1745. This is false. See recent clockrings the Union enclosed in their contentions package. Derwood Carriers worked as late as 1942 (7:25PM)!

Management wrote in their contentions that the Union did not cite the NON-ODL's or available ODL's in this case. This is false! See the Union's contentions.

Sincerely,

Kenneth Lerch
President NALC 3825