

USPS-RT-2

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

SIX-DAY TO FIVE-DAY CARRIER DELIVERY
AND RELATED SERVICE CHANGES, 2010

Docket No. N2010-1

**SURREBUTTAL TESTIMONY OF
ALAN MOORE
ON BEHALF OF THE
UNITED STATES POSTAL SERVICE**

1 **Autobiographical Sketch**

2 My name is Alan S. Moore. I am the Manager of Labor Relations, Policy and
3 Programs, for the United States Postal Service at its national headquarters at
4 475 L'Enfant Plaza, SW, Washington DC. My office is responsible for negotiating
5 and administering collective bargaining agreements with the National Association
6 of Letter Carriers, AFL-CIO (NALC), and the Postal Police Officers Association. I
7 am also responsible for national oversight of postal labor relations policies and
8 programs.

9 I have been employed by the Postal Service since 1978 and in various
10 positions involving labor relations since 1988. I have worked at Postal Service
11 headquarters since 2002. On behalf of the Postal Service, I participated in
12 collective bargaining with the NALC during the negotiations that culminated in the
13 2001 and 2006 national collective bargaining agreements.

14 I received a Bachelor of Science degree in Human Resources
15 Management from Strayer University, Alexandria, Virginia.

1 **I. Purpose and Scope of Testimony**

2 The purpose of my testimony is to rebut the testimony of National
3 Association of Letter Carriers witness William Young (NALC-T-2) insofar as it
4 implies that the Postal Service failed to pursue an offer made during the 2006
5 collective bargaining negotiations to achieve significant carrier cost savings.

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8 **II. The 2006 USPS-NALC Agreement Achieved Significant Savings**
9 **And Workforce Flexibility**

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12 During the collective bargaining negotiations that led to the current
13 National Agreement between the United States Postal Service and the National
14 Association of Letter Carriers, AFL-CIO (NALC), I served as a member of the
15 bargaining team, attended all main table sessions, and was responsible for
16 chairing a subcommittee.

17 NALC witness William Young testifies that during the bargaining sessions
18 leading to that agreement, the NALC made an offer to the Postal Service that
19 included a "package of proposed savings," including a separate workforce of
20 letter carriers to deliver mail on Saturdays, made up of retirees and new hires.
21 NALC-T-2 at 1; Tr. Vol. VIII at 2297.

22 Just so the record is clear, the Commission should understand that the
23 NALC's on-the-record proposal for a new Saturday workforce included the
24 following conditions:

1 (1) conversion of all city letter carriers to an all regular, full-time, Monday
2 through Friday workforce (regardless of office size), (2) establishment of
3 "Saturday Carriers," for which retired city carriers would have preference,
4 with Saturday Carriers to be covered by the collective bargaining
5 agreement with limited exceptions appropriate to their status, (3) USPS
6 and NALC to seek approval from OPM for an "early out" voluntary early
7 retirement, and (4) prohibition against subcontracting any city letter carrier
8 work.

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10 The parties did not reach agreement on this NALC proposal. Instead, the Postal
11 Service was able to achieve cost savings and greater carrier workforce flexibility
12 through increased ability to utilize Transitional Employees with the 2006 National
13 Agreement. The agreement on Transitional Employees was at least as valuable
14 to the Postal Service as the NALC's proposal.