

Mid-Hudson Clerk Employees

TOUR 3

<u>Automation</u>	<u>Automation</u>	<u>FSM 100</u>	<u>FSM 100</u>	<u>SPBS</u>	<u>SPBS</u>
(1-9-2013)	(4-16-2013)	(1-9-2013)	(4-16-2013)	(1-9-2013)	(4-16-2013)
33 employees	18 employees	3 employees	3 employees	16 employees	12 employees
3 vacancies	15 retirees				1 vacancy
	24 reverted				1 retiree
					2 reverted

<u>Manual</u>	<u>Manual</u>	<u>Expeditor</u>	<u>Expeditor</u>	<u>Express</u>	<u>Express</u>	<u>Registry</u>	<u>Registry</u>	<u>Label/C</u>	<u>Label/C</u>
(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9)	(4-16)
1	1	4	4	2	2	2	2	2	2

<u>limited duty</u>	<u>light duty</u>	<u>unassigned</u>	<u>unassigned</u>	<u>PSEs</u>	<u>PSEs</u>
(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)
3	3	4	3	3	12

Total Tour 3 Clerks Presently = 50 January we had 70 Clerks

Non Career (PSES) Presently = 12 January we had 3 (PSES)

Tour 1

<u>Automation</u>	<u>Automation</u>	<u>FSM100</u>	<u>FSM100</u>	<u>SPBS</u>	<u>SPBS</u>
(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)
55 employees	51	2	2	13	11
1 vacancy	3 Retirees				1 reversion
6 residuals	7 residuals				1 residual
	1 reversion				

<u>Manual</u>	<u>Manual</u>	<u>Manual Flats</u>	<u>Manual Flats</u>	<u>Expeditor</u>	<u>Expeditor</u>	<u>Registry/E</u>	<u>Registry/E</u>
(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)
13	8	5	4	5	5	3	3
	5 retirees		1 retiree				

<u>Unassigned Reg</u>	<u>Unassigned Regular</u>	<u>Limited duty</u>	<u>Limited duty</u>
(1-9-13)	4-16-13)	(1-9-13)	(4-16-13)
4	3	1	1

<u>PSE (Postal Support Employees)</u>	<u>PSES</u>
(1-9-13)	(4-16-13)
5 (2 transferred cust.)	8

Total Tour 1 Clerks Presently = 88 January we had 101 Clerks

Non-Career PSES Presently = 8 January we had 5 PSES

TOUR 2

<u>Manual</u>	<u>Manual</u>	<u>Express</u>	<u>Express</u>	<u>Expeditor</u>	<u>Expeditor</u>
(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)	(1-9-13)	(4-16-13)
1	1	2	2	2	2

Total Clerks in Building January 9, 2013 111 PSEs 8 119 total

Total clerks in Building April 16, 2013 101 PSEs 20 121 total

NORTHEAST AREA RESIDUAL VACANCY LIST

April 2013 - ALBANY

\*Additions and changes for this month are in Green; Deletions for this month are in Red; Changes are in Blue

PC	Craft	Residual/Vacancy Location	Date Area Received/Residual	Position Number	Start Time	End Time	Non Sch Days	Title	Lev el	Withholding For	Finalized Date Employee Name
Albany	1	Albany Plant	6/28/10	70313161	2145	615	wet/hur	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	2/13/11	950898793	2200	630	tue/wed	general expeditior	7	Art 12	
Albany	1	Albany Plant	6/28/10	70251653	2145	615	tue/wed	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	1/18/8/10	70251656	2145	615	th/fri	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	11/18/10	70328285	2145	615	th/fri	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	2/13/11	95317222	2145	615	th/fri	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	6/9/11	95128479	2145	615	th/fri	mail pr clerk	6	Art 12	
Albany	1	Albany Plant	6/9/11	95216230	2145	615	tue/wed	mail pr clerk	6	Art 12	
Albany	1	Albany Plant	5/9/12	95090661	1330	2200	TUWVe	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	6/20/11	70251655	2145	615	th/fri	mail pr clerk	6	Art 12	
Albany	1	Albany Plant	5/8/12	70228662	2030	500	Th/Fr	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	5/9/12	70228774	2130	600	TUWVe	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	7/27/12	70282543	2145	615	Th/Fri	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	7/27/12	70286195	1330	2200	wet/hur	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	7/27/12	70228514	1400	2230	wet/hur	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	7/27/12	70268198	2145	615	We/Th	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	70268199	2145	615	TUWVe	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	95194475	2145	615	TUWVe	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	70282609	1330	2200	TUWVe	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	70328286	1330	2200	Mo/Tu	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	95159379	2145	615	SU/Mo	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	95208417	2145	615	Mo/Tu	Mail Pr Clerk	6	Art 12	
Albany	1	Albany Plant	3/18/13	70714576	2145	615	Sa/Fr	Lead Mail Pr Clerk	7	Art 12	
Albany	1	Albany Plant	3/18/13	70717699	2300	730	Th/Fr	Lead Mail Pr Clerk	7	Art 12	
Albany	1	Ballston Spa	4/23/13	70673793	varies	varies	Sun/Thu	NTFT Flex (31 hr) SSDA	6	Art 12	Withheld-Delmar Sat 715-1215, Mon 1000-1600 60L, Wed 815-1715 60L, Thu 945-1745 60L, Fri 715-1445 60L
Albany	1	Cortland	12/28/2012	70784068	varies (30 hr NTFT)		Su/Wed	SSDA	6	Art 12	Sa 6-12, Mo 1130-1730, We 700-1300, Th 430-1030, Fr 530-1130 NS-Su/Tu withheld for Binghamton AMP
Albany	1	East Syracuse	1/22/13	95158853	varies		Su/Wed	Lead Sales & Services Associate	7		Sat 6-1430 30L, Mon-Tue 830-1800 90L, Thu-Fri 830-1800 90L
Albany	1	Glens Falls	5/25/12	95180022	varies: 32 hour NTFT		NTFT	NTFT clerk	6	Art 12	Sa 5-10; Tue-Wed 5-10; Thurs 5-11; Friday 5-10; Mon 5-11; 32 hour NTFT
Albany	1	Lake Placid	5/9/12	70183290	815	1715	Sa/Su	Mail Pr Clerk	6	Art 12	

Exhibit #2  
3 pages

17 Subs Residual

Exhibit # 2  
No Applicants

REQUESTED_AREA	REQUESTED_DISTRICT	INSTALLATION_CITY STATE	JOB NUMBER	JOB_TITLE	CHOICE #
1 Northeast Area	Albany District	ALBANY NY	70228659	MAIL PROCESSING CLERK	
2 Northeast Area	Albany District	ALBANY NY	70228754	MAIL PROCESSING CLERK	
3 Northeast Area	Albany District	ALBANY NY	70228773	MAIL PROCESSING CLERK	
4 Northeast Area	Albany District	ALBANY NY	70339349	MAIL PROCESSING CLERK	
5 Northeast Area	Albany District	ALBANY NY	70410366	MAIL PROCESSING CLERK	
6 Northeast Area	Albany District	ALBANY NY	70604655	MAIL PROCESSING CLERK	
7 Northeast Area	Albany District	ALBANY NY	70828791	SALES,SVCS/DISTRIBUTION ASSOC	
8 Northeast Area	Albany District	ALBANY NY	70834962	MAIL PROCESSING CLERK	
9 Northeast Area	Albany District	ALBANY NY	70834963	MAIL PROCESSING CLERK	
10 Northeast Area	Albany District	ALBANY NY	70835562	MAIL PROCESSING CLERK	
11 Northeast Area	Albany District	ALBANY NY	95107322	SALES,SVCS/DISTRIBUTION ASSOC	
12 Northeast Area	Albany District	ALBANY NY	95154015	MAIL PROCESSING CLERK	
13 Northeast Area	Albany District	ALBANY NY	95200413	MAIL PROCESSING CLERK	
14 Northeast Area	Albany District	ALBANY NY	95202673	MAIL PROCESSING CLERK	
15 Northeast Area	Albany District	ALBANY NY	95353133	MAIL PROCESSING CLERK	
16 Northeast Area	Albany District	ALBANY NY	95393627	SALES,SVCS/DISTRIBUTION ASSOC	
17 Northeast Area	Albany District	ALBANY NY	95428131	SALES,SVCS/DISTRIBUTION ASSOC	
Northeast Area	Albany District	ROME NY	70673791	SALES,SVCS/DISTRIBUTION ASSOC	
Northeast Area	Albany District	SARATOGA SPRINGS NY	70214938	SALES,SVCS/DISTRIBUTION ASSOC	
Northeast Area	Albany District	SARATOGA SPRINGS NY	70694235	SALES,SVCS/DISTRIBUTION ASSOC	
Northeast Area	Albany District	SYRACUSE NY	70268797	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70268798	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70614042	SALES,SVCS/DISTRIBUTION ASSOC	
Northeast Area	Albany District	SYRACUSE NY	70720553	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720607	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720609	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720610	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720614	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720619	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70720676	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70778429	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	70778435	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	95075941	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	95162238	MAIL PROCESSING CLERK	
Northeast Area	Albany District	SYRACUSE NY	95229690	SALES,SVCS/DISTRIBUTION ASSOC	





Exhibit #3  
14 pages

**American Postal Workers Union, AFL-CIO**

1300 L Street, NW, Washington, DC 20005

**Greg Bell**  
Executive Vice President

202-842-4250 (Office)  
202-842-4297 (Fax)

March 28, 2013

**National Executive Board**

Cliff Guffey  
President

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Executive Vice President

Elizabeth "Liz" Powell  
Secretary-Treasurer

Mike Morris  
Director, Industrial Relations

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Steven G. Raymer  
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Robert C. "Bob" Pritchard  
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Sharyn M. Stone  
Coordinator, Central Region

Mike Gallagher  
Coordinator, Eastern Region

John H. Dirzius  
Coordinator, Northeast Region

Princella Vogel  
Coordinator, Southern Region

Omar M. Gonzalez  
Coordinator, Western Region

**To: Greg Bell**  
**From: Greg Bell**  
**Subject: Follow-up to ltr dtd 3-26-13 regarding the Advance Implementation of 53 Sites the USPS has added (2) Additional sites to be added to that list (Notification No. GCCG20130214)**

Please find attached a copy of a letter dated 3/28/2013 from Patrick Devine, regarding the above reference matter.

You are designated as the APWU contact person in this matter. Contact the USPS representative as soon as possible for discussion, if appropriate. Please provide notification of your review to me by 4/29/2013.

Please note: Your secretary should update the Notification Tracking Module in Step 4 CAS as necessary.

GB/bb  
opeiu #2/af-cio

LABOR RELATIONS



March 28, 2013

Mr. Cliff Guffey  
 President  
 American Postal Workers  
 Union, AFL-CIO  
 1300 L Street, N.W.  
 Washington, DC 20005-4128

**Certified Mail Tracking Number:**  
**7012 2920 0000 8277 3000**

Fax: (202) 842-4297

Dear Cliff:

As a follow up to the notice provided Tuesday, March 26, regarding the decision to advance the implementation of approximately 53 sites to 2013, the two additional sites indicated below are to be included.

Study Facility				Gaining Facility(ies)				Mail Move(s)	Type
Area	Facility	City	State	Area	Gaining Site	City	State		
NE	Brooklyn P&DC	Brooklyn	NY	NE	Morgan P&DC	New York	NY	Sept 2013	Orig
NE	Mid-Hudson P&DC	Newburgh	NY	NE	Albany P&DC	Albany	NY	Orig & INP in June 2013	Orig & Dest

The reason for this change is that the Postal Service has identified the opportunity to accelerate the anticipated savings while still maintaining the Interim SCF service standard. The Postal Service continues to face one of the most difficult challenges in its history. The current economic downturn and continued internet diversion has led to historically large deficits. As a result, the Postal Service is not receiving enough revenue to sustain the cost of its processing and delivery network.

It is projected that these consolidations will result in significant savings for the Postal Service. Some affected career employees may be reassigned to other vacant positions. Reassignments will be made in accordance with the collective bargaining agreement.

If you have questions, or need additional information, please contact Rickey Dean at extension 7412.

Sincerely,

Patrick M. Devine  
 Manager  
 Contract Administration (APWU)



## American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

April 10, 2013

Greg Bell  
Executive Vice President  
(202) 842-4246 Office  
(202) 842-4297 Fax

Via Facsimile and First Class Mail

Mr. Patrick M. Devine  
Manager, Contract Administration  
United States Postal Service  
475 L'Enfant Plaza, S.W.  
Washington, D. C. 20260-4101

Re: PMG's Decision to Advance the  
Implementation of Facilities for  
Consolidation from 2014 to 2013

**National Executive Board**

Cliff "C.J." Guffey  
President

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Shayn M. Stone  
Coordinator, Central Region

Mike Gallagher  
Coordinator, Eastern Region

John H. Drzus  
Coordinator, Northeast Region

Princella Vogel  
Coordinator, Southern Region

Ornel M. Gonzalez  
Coordinator, Western Region

Dear Mr. Devine:

I am writing in response to your letters of January 17, 2013, March 26, 2013, and March 28, 2013, notifying the APWU of the Postal Service's decision to accelerate the consolidation of certain facilities' mail processing operations from 2014 to 2013. Your January 17 letter identified 18 facilities, your March 26 letter identified 53 facilities, and your March 28 letter identified another 2 facilities.

The APWU requests that the Postal Service cancel plans to accelerate implementation of these and any other consolidations.

Accelerating the consolidations will cause unnecessary disruption in the lives of employee, harm communities, delay service, and drive away customers. It also violates the commitment Postmaster General Patrick Donahoe made to employees, customers, communities, local and state governments, and members of Congress.

In a May 17, 2012, press release, PMG Donahoe stated, "We revised our network consolidation timeline to provide a longer planning schedule for our customers, employees and other stakeholders, and to enable a more methodical and measured implementation."

The Postal Service continues to be the subject of criticism and ridicule for the uncertainty it creates – saying one thing and doing another, shifting from plan to plan, citing questionable cost savings and impacts on service, and adversely affecting businesses, individual customers, communities and employees.

As the USPS Office of Inspector General noted on March 27, 2013, "Consolidation activities during the 2012 fall mailing season also conflicted with some information shared with stakeholders. In addition, the Postal Service repeatedly revised estimated cost savings, which caused stakeholders to further question the initiative. When information is inconsistent, the Postal Service risks diminishing public confidence while increasing opposition to optimization efforts." (Management Advisory Report # NO-MA-13-004, *Lessons Learned from Mail Processing Network Rationalization Initiatives*.) Creditability and transparency are important. Obviously, this is a lesson ignored, rather than learned.

In the notification letters to the APWU cited above, the Postal Service wrote, "The reason for this change is that the Postal Service has identified the opportunity to accelerate the anticipated savings while still maintaining the interim SCF service standard." This assertion is unsupported and highly questionable.

In fact, on April 3, 2013, in a video address to employees, Postmaster General Donahoe acknowledged as much. He said, "What we're trying to figure out is how to maintain that 35 percent overnight service going forward while we make the consolidations."

Furthermore, the Postal Service's methodology is flawed. The cost factors the USPS relied on last year when it approved the consolidations were faulty. Since then, the cost factors have changed significantly, making the studies that justified the original consolidation decisions obsolete. In addition, the Postal Service has made numerous unreported modifications to the plan, such as changing the receiving facilities without recalculating potential savings and losses.

Accelerating the consolidations would be counter-productive and the decision should be abandoned.

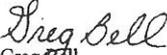
In the event that the Postal Service decides not to reconsider its plans to advance the consolidations of mail processing operations from 2014 to 2013, the APWU request the following information:

1. Please explain how the Postal Service can accelerate the consolidation of mail processing operations at each of these facilities while maintaining the interim SCF service standards, and please provide the APWU any related supporting data.
2. Has the Postal Service taken into consideration the effect its decision to accelerate these consolidations from 2014 to 2013 will have on the impacted communities, customers, businesses and employees? If so, please explain what impact the Postal Service has determined the acceleration of these consolidations will have on these stakeholders, if any. If the Postal Service has not considered the impact its decision will have on these stakeholders, please explain why not.

Please provide a response within fourteen (14) days from receipt of this letter, indicating whether the Postal Service intends to supply the requested information, and if so, when the information will be provided. If the Postal Service does not intend to provide the requested information, please provide an explanation why not.

Your cooperation in this matter would be greatly appreciated. I look forward to your prompt reply. If you have any questions, please feel free to contact me at (202) 842-4250.

Sincerely,

  
Greg Bell  
Executive Vice President

GB:ah//opeiu#2/afl-cio



## American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

April 11, 2013

Greg Bell  
Executive Vice President  
(202) 842-4246 Office  
(202) 842-4297 Fax

Via Facsimile and First Class Mail

Mr. Patrick M. Devine  
Manager, Contract Administration  
United States Postal Service  
475 L'Enfant Plaza, S.W.  
Washington, D. C. 20260-4101

Re: PMG's Decision to Advance the  
Implementation of Facilities for  
Consolidation from 2014 to 2013

National Executive Board

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Director, MFT Division

Bill Mahney  
Director, Support Services Division

Therese M. Stone  
Coordinator, Central Region

Mike Galinger  
Coordinator, Eastern Region

Alfonso M. Durazo  
Coordinator, Northeast Region

Priscilla Vogel  
Coordinator, Southern Region

Orlando M. Gonzalez  
Coordinator, Western Region

Dear Mr. Devine:

On March 8, 2013, I wrote to you concerning your January 17, 2013 letter notifying the APWU that a decision had been made to advance the implementation of eighteen sites for consolidation from 2014 to 2013. More recently we were notified of fifty-three and two additional accelerated implementation sites by your letters of March 26 and 28, respectively.

To date, the Postal Service has not responded or provided the information APWU requested by letter dated March 8, 2013, regarding the 18 facilities identified by the Postal Service for advanced implementation. This letter represents a second request for the information APWU requested on March 8, 2013, in addition to a request for information regarding the additional 55 facilities that the Postal Service identified for advanced implementation.

Notwithstanding the APWU's April 10 request that the Postal Service cancel plans to accelerate implementation of these and any other consolidations, the APWU hereby requests the following information:

1. In your March 26 letter, Clovis TX CSMPC is listed as the losing facility and Lubbock TX P&DF is identified as the gaining facility. The Area Mail Processing (AMP) Feasibility study for Clovis into Lubbock was approved on February 20, 2012. However, in your January 17 letter, Roswell NM CSMPC is listed as the gaining facility.

Furthermore, our records show that an AMP study for Roswell NM CSMPC into Lubbock TX P&DF was also approved on February 20, 2012.

It is requested that the Postal Service clarify where it intends to move the Clovis operations. If any of the operations or portions of the operations are being moved into Roswell, it is requested that the APWU be provided both redacted and un-redacted copies of the AMP study. If operations (or portions of the operations) are being moved into Lubbock P&DF, it is requested that the APWU be provided an un-redacted copy of the AMP study.

2. The record shows that a redacted copy of an AMP Feasibility study (approved on February 20, 2012) for Clovis TX CSMPC into Roswell NM CSMPC was made available to the Postal Regulatory Commission (PRC). However, we have no record of the Postal Service ever notifying the union of the intent to conduct the study, nor being provided a copy of the AMP study.

It is requested that the Postal Service explain how and why an AMP study was approved and the union was never notified or provided a copy. If your records indicate that the APWU was notified, it is requested that confirmation be provided.

It is also requested that the Postal Service provide the APWU copies of any AMP studies that were submitted to the PRC, but were not provided to the APWU.

3. In the event any AMP studies provided to the APWU were subsequently changed or modified, it is requested that the Postal Service provide the APWU copies of the modified redacted and un-redacted AMP studies. This request applies to any AMP study that was provided to the APWU, and was subsequently changed or modified.
4. In your January 17 and March 26 letters, Cumberland MD CSMPC is listed as the losing facility, and Baltimore MD P&DC is listed as the gaining facility. However, in a letter that you sent the APWU on September 14, 2011, Johnstown PA P&DC was listed as the gaining facility. In addition, the record shows an AMP study for Cumberland MD CSMPC into Johnstown PA P&DC was approved in February 2012.

It is requested that the Postal Service clarify where it intends to move the Cumberland operations. If operations or portions of the operations are being moved into Baltimore, it is requested that the APWU be provided both redacted and un-redacted copies of the AMP study. If operations (or portions of the operations) are being moved into Johnstown, APWU will need an un-redacted copy of any AMP study.

5. In your March 26 letter, East TX P&DC is listed as the losing facility, and North TX P&DC is listed as the gaining facility. However, in your January 17 letter, Shreveport is listed as the gaining facility.

The record also indicates that in a letter that you sent the APWU on September 14, 2011, Shreveport LA P&DC, North Texas TX P&DC and/or North Houston TX P&DC were listed as gaining facilities.

However, in February 2012, a combined AMP study was approved for East Texas into

Austin, East Texas into North Texas TX P&DC and East Texas into Shreveport LA. It is requested that an un-redacted copy of this AMP study be provided to the APWU.

It is also requested that the Postal Service clarify where it intends to move the East Texas P&DC operations (or portions of the operations), and provide the APWU both redacted and un-redacted copies of the related AMP study.

6. In my March 8 letter, I indicated that we did not have the AMP study for Valdosta GA CSMPC into Tallahassee FL P&DC that was listed in your January 17<sup>th</sup> letter. However, a study of Valdosta into Tallahassee was included in the un-redacted studies received by the APWU last week; but we have no record of ever receiving a redacted copy of the AMP study.

Please explain why the APWU was never notified of the Postal Service's intent to conduct an AMP study for CSMPC into Tallahassee FL P&DC and a copy of the study was not provided. It is requested that a copy be provided. If your records indicate that the APWU was notified it is requested that confirmation be provided.

It should also be noted in a letter that you sent the APWU on September 14, 2011, Jacksonville FL P&DC was listed as the gaining facility. In addition, the record shows an AMP study for Valdosta GA CSMPC into Jacksonville FL P&DC was approved in February 2012.

It is also requested that the Postal Service clarify where it intends to move the Valdosta GA CSMPC operations (or portions of the operations). If Valdosta is moving into Tallahassee, the APWU will need a redacted copy of the AMP study. If Valdosta is moving into Jacksonville, APWU will need an un-redacted copy of the AMP study.

7. Martinsburg CSMPC into Baltimore P&DC is listed in your January 17 letter. However, the un-redacted AMP study was not included in the studies received last week, and it is requested that it be provided.
8. Canton OH P&DF into Akron OH P&DC is listed in your March 26 letter. However, we have no record of ever being provided a redacted and un-redacted AMP study for Canton into Akron. It is requested that copies of the studies be provided. Please note that the record shows that AMP study was approved on February 20, 2012 for Canton into Cleveland.

Please explain why the APWU was never informed that an AMP study for Canton OH P&DF into Akron OH P&DC was approved nor provided a copy. It is requested that a copy of the studies be provided.

It is also requested that the Postal Service clarify where it intends to move the Canton OH P&DF operations (or portions of the operations). If the operations will move to Cleveland, APWU will need an un-redacted copy of the AMP study.

9. Clarksburg WV P&DF into Charlestown WV and Pittsburgh PA is listed in your March 26 letter. It is requested that an un-redacted copy of the study be provided to the APWU.
10. The APWU was not provided both the redacted and un-redacted AMP studies for the following facilities that were also listed in your March 26 letter. It is requested the studies be provided, and please explain why the APWU was never provided copies when the AMP studies were approved:
- a) Carbondale IL CSMPC into Saint Louis MO P&DC
  - b) Centralia IL CSMPC into Saint Louis MO P&DC
  - c) Stamford CT P&DC into Westchester NY P&DC
  - d) Houston TX P&DC into North Houston TX P&DC
  - e) Butte MT CSMPC into Billings MT P&DC
11. Bryan TX CSMPC into North Houston P&DC is listed in your March 26 letter. However, the APWU has not received an un-redacted copy of the AMP study. However, APWU received a June 23, 2011 letter from you indicating approval for moving originating mail from Bryan to North Houston, although the redacted AMP study attached to your letter does not show the approval page.

APWU received a redacted study of Bryan TX CSMPC destinating mail moving to Austin TX. The study appears to have been approved around February 19, 2012; but the signature and approval page is of such poor quality we can't be sure. APWU does not have an un-redacted copy of this study. Please provide the unredacted copy of the study.

12. Lufkin TX CSMPC to North Houston P&DC is listed in your March 26 letter. We received an un-redacted copy of the study last week; but do not have a redacted copy. It is requested that the redacted copy be provided and please explain why the APWU was never provided the AMP study when it was approved.

The record shows that we have a February 19, 2012 redacted AMP study for Lufkin TX destinating mail moving into Beaumont TX; but did not receive the un-redacted version of the Lufkin to Beaumont study. It is requested that the un-redacted copy be provided.

The record shows that APWU received a February 11, 2011 approved study moving originating mail from Lufkin to East TX P&DC. APWU received a redacted copy of the study. Please provide the un-redacted copy of the study.

Please clarify the apparent conflict between the two previous studies moving originating

- and destinating mail out of Lufkin and the most recent March 26 listing and un-redacted study APWU recently received. Where did or where will the Lufkin operations move?
13. The following three facilities listed in your March 26 letter have operations moving to more than one gaining site. It is requested that the Postal Service clarify what operations are moving to each of the gaining facilities.
    - a) Clarksburg WV P&DF into Charleston WV P&DC and Pittsburgh PA P&DC
    - b) Toledo OH P&DF into MI Metroplex MI P&DC and Columbus OH P&DC
    - c) Southern CT P&DC into Hartford CT P&DC and Springfield MA NDC
  14. Generally, the studies on these sites have boilerplate language that local impacts of service were dependent on the outcome of proposed national service standard changes and the ultimate nodes in a new network. So most studies did not provide information about service impacts. The first phase of service standard changes are now in place, so it is possible to measure what volumes of mail by class will be upgraded or downgraded by these consolidations. It is requested that the Postal Service provide estimated volumes for all studies that did not have estimates and update any study that did estimate volume impacts before the service standard changes were finalized.
  15. Please identify the actual savings that the Postal Service anticipates by advancing the implementation of the consolidation of each of the accelerated implementation facilities.
  16. Has the anticipated savings of the accelerated implementation sites remained the same since the PMG announced that Phase II of the Network Consolidation Plan in May 2012, and if it has changed please explain? For example, has the One-Time Retirement Incentive reduced the staffing in these facilities and if so, how has that changed the anticipated savings? If it has not changed, please explain why there has been no change?
  17. Has the Postal Service updated the data used in the AMP studies since they were first approved? If so, what new factors were considered and how have they impacted the conclusions originally reported? For example, please see the USPS response to Senator Stabenow concerning Lansing MI. You will note that the current consolidation of Lansing had many differences from the plan and analysis done in the 2012 AMP. It is requested that the APWU be provided with the updated plans for the accelerated implementation of consolidations listed in your January 17, March 26 and 28 letters.

Please provide a response within fourteen (14) days from receipt of this letter, indicating whether the Postal Service intends to supply the requested information, and if so, when the information will be provided. If the Postal Service does not intend to provide the requested information, please provide an explanation why not.

Your cooperation in this matter would be greatly appreciated. I look forward to your prompt reply. If you have any questions regarding the information requested, you can contact Phil Tabbita at (202) 256-9642.

Sincerely,

A handwritten signature in cursive script that reads "Greg Bell".

Greg Bell  
Executive Vice President

GB:ah/opciu#2/alf-cio



## American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

Cliff "C.J." Guffey  
President  
(202) 842-4246

April 24, 2013

### National Executive Board

Cliff "C.J." Guffey  
President

Gary Bell  
Executive Vice President

Elizabeth Lutz Powell  
Secretary, Treasurer

Mike Morris  
Director, Industrial Relations

Rob Strunk  
Director, Clerk Division

Steven G. Raymer  
Director, Maintenance Division

Robert C. Bob Pritchard  
Director, MVS Division

Bill Munkley  
Director, Support Services Division

Sharon M. Stone  
Coordinator, Central Region

Mike Gallagher  
Coordinator, Eastern Region

John H. Dineen  
Coordinator, Northeast Region

Priscilla Vogel  
Coordinator, Southern Region

Debra M. Gonzalez  
Coordinator, Western Region

Patrick R. Donahoe  
Postmaster General and Chief Executive Officer  
United States Postal Service  
475 L'Enfant Plaza, S.W.  
Washington, D. C. 20260-0010

Dear Mr. Donahoe:

The purpose of this letter is to reiterate the American Postal Workers Union's opposition to the Postal Service's decision to accelerate the consolidation and closure of more than 70 mail processing facilities from 2014 to 2013. We request that you postpone these consolidations and any other pending consolidations.

Accelerating the consolidations will cause unnecessary disruption in the lives of employees, harm communities, delay service, and drive away customers.

Furthermore, we do not believe it is possible to implement the consolidations and meet current USPS service obligations. As you said in a video message to employees, the Postal Service is still trying to figure out how to maintain service standards while making the consolidations.

Equally as important, it is contrary to the public commitment you made to employees, customers, communities, members of Congress and other stakeholders. As you may recall, in a May 17, 2012 press release, you stated, "*We revised our network consolidation timeline to provide a longer planning schedule for our customers, employees and other stakeholders, and to enable a more methodical and measured implementation.*"

Letter to Patrick Donahoe  
April 24, 2013  
Page Two

We believe that when a commitment is made to give impacted stakeholders, including members of Congress, time to adapt, such commitments must be kept.

I hope that you reconsider.

Sincerely,

A handwritten signature in black ink, appearing to read "Cliff Guffey". The signature is fluid and cursive, with the first letter "C" being particularly large and stylized.

Cliff Guffey  
President

CG/lbb(sd)  
opeiu#2, afl-cio



April 25, 2013

Greg Bell  
Executive Vice President  
American Postal Workers  
Union (APWU), AFL-CIO  
1300 L Street, NW  
Washington, DC 20005-4128

**Certified Mail Tracking Number:**  
**7012 3460 0000 4468 6164**

**Re: Information Request (IR13-11)**

Dear Greg:

This is in response to your March 8 letter regarding the Postal Service's notice dated, January 17 (enclosed), of the decision to advance the implementation of 18 Area Mail Processing (AMP) sites from 2014 to 2013.

This request has been assigned information request tracking number IR13-11 and shall be processed in accordance with the applicable rules, regulations, and the USPS/APWU Collective Bargaining Agreement. In order to facilitate the timely processing of this request, please refer to the above-referenced tracking number in any future, related correspondence.

The March 8 letter requests that when the Postal Service provides unredacted copies of the AMP studies for the list first provided on February 22, 2012, and in accordance with the recent National Labor Relations Board (NLRB) settlement, in which the Postal Service agreed to provide AMP Feasibility Studies and Post Implementation Reviews (PIR) unredacted, that updated unredacted studies for any AMP in which the gaining facility has changed be provided also.

The Postal Service agrees and will provide unredacted studies for any completed and approved AMP in which the gaining facility has changed.

The Union further requested additional information specific to the List of 18 sites provided with the January 17 notice. Below are the Union's requests and the Postal Service' responses:

1. APWU cannot locate any AMP studies for
  - Clovis CSMPC to Roswell
  - Cumberland CSMPC to Baltimore
  - Valdosta CSMPC to Tallahassee

If there are no AMP studies for these consolidations, please provide whatever business plan analysis was performed and in particular any analysis and quantification of service performance changes that might result from the consolidation.

**Response:** The enclosed computer disc (CD) contains both redacted and unredacted copies of the above referenced AMP studies. Redacted versions were sent previously.

2. Please provide information about the service impacts for each of these sites and indicate the time frame for the analysis.

**Response:** The service impacts are addressed in the Executive Summary and Summary Narrative of the enclosed studies. The service impacts are in accordance with the interim service standards. The time frame of each study is also identified in the Executive Summary.

3. Please identify the actual savings that the Postal Service anticipates by advancing the implementation of the consolidation of each of the eighteen (18) sites.

**Response:** The enclosed spreadsheet shows the list of 18 sites with the anticipated savings as a result of the advanced implementation.

4. Has the anticipated savings of these 18 sites remained the same since the PMG announced that Phase II of the Network Consolidation Plan in May 2012, and if it has changed, please explain? For example, has the One-Time Retirement Incentive reduced the staffing in these facilities and if so, how has that changed the anticipated savings?

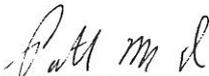
**Response:** The anticipated savings has not changed since the May 2012 announcement. Savings related to employee complements are based on reductions, whether through attrition, transfers, or local initiatives involving staffing and scheduling. Retirements related to the One-Time Incentive MOU would be an element of attrition and would count toward the reductions.

5. Please see the USPS response to Senator Stabenow concerning Lansing, MI. You will note that the current consolidation of Lansing had many differences from the plan and analysis done in the 2012 AMP. Please provide the updated plans for these consolidations.

**Response:** There is nothing in the Postal Service response to Senator Stabenow to indicate substantive changes to the AMP study as announced in February 2012. The plan is still to move ZIPs 488 and 489 into Grand Rapids, and ZIP 492 (Jackson, MI) into Michigan Metroplex. Consolidation of originating mail from the Lansing facility was finalized in February, while the consolidation of the destinating mail is scheduled for 2014. Some changes in transportation, as discussed in the response to Senator Stabenow, will be addressed in the Post Implementation Review (PIR) process.

If you have any further questions please contact Rickey Dean at extension 7412.

Sincerely,



Patrick M. Devine  
Manager  
Contract Administration (APWU)

Enclosures



May 1, 2013

Greg Bell  
Executive Vice President  
American Postal Workers  
Union (APWU), AFL-CIO  
1300 L Street, NW  
Washington, DC 20005-4128

**Certified Mail Tracking Number:  
7012 2920 0002 1174 9081**

Dear Greg:

This is in response to your April 11 letter concerning the Postal Service's notice dated January 17, regarding the advanced implementation of 18 sites for consolidation, and the subsequent March 26 and March 28 notices regarding the advanced implementation of 55 additional sites.

The Postal Service responded to your March 8 letter, regarding the January 17 notice, by letter dated April 25. With regard to the March 26 and March 28 notices the April 11 request has been assigned information request tracking number **IR13-14** and shall be processed in accordance with the USPS/APWU Collective Bargaining Agreement and applicable rules and regulations. In order to facilitate the timely processing of this request, please refer to the above-referenced tracking number in any future, related correspondence.

Please note that the requested information may not be within direct control of this office, and may require this office to make inquiries regarding the existence and location of such information. The amount of time needed to accomplish this is unknown and will depend on a myriad of practical factors, including the availability of the requested data, the scope and volume of the requested data, and other important tasks undertaken by those seeking to fulfill the information request. The search may be expensive, and the union is responsible for reasonable costs per Article 31, Section 3, of the Collective Bargaining Agreement and Section 4-6.5, *How to Assess Fees*, of Handbook AS-353, Guide to Privacy of the Freedom of Information Act and Records Management, which sets out the applicable costs for fees incurred in processing information requests. You will be notified if this request requires remittance on the part of the APWU for photocopies and/or time spent processing the information.

Moreover, if you feel this request is of an urgent nature and lack of the requested information may adversely affect the union's time limits in the grievance procedure; do not hesitate to contact me immediately to seek an extension of contractual time limits.

If you have any further questions please contact Rickey Dean at extension 7412.

Sincerely,

A handwritten signature in cursive script that reads "P. M. Devine".

Patrick M. Devine  
Manager  
Contract Administration (APWU)



MAY 10 2013

May 9, 2013

Greg Bell  
Executive Vice President  
American Postal Workers  
Union (APWU), AFL-CIO  
1300 L Street, NW  
Washington, DC 20005-4128

**Certified Mail Tracking Number:**  
**7012 2920 0002 1174 9234**

Dear Greg:

This is in response to your April 10 letter regarding the Postal Service's notice dated January 17, regarding the advanced implementation of 18 sites for consolidation, and the subsequent March 26 and March 28 notices regarding the advanced implementation of 55 additional sites. In that letter, the Union requests that "the Postal Service cancel plans to accelerate implementation of these and any other consolidations."

Please be advised that there has been no change in the plans to advance the implementation of consolidations at the sites identified in the notices referenced above.

The Union's April 10 letter also makes request for general information regarding the advanced implementations.<sup>1</sup> Please advise if the Union is still requesting that information.

If you have any further questions please contact Rickey Dean at extension 7412.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick M. Devine".

Patrick M. Devine  
Manager  
Contract Administration (APWU)

<sup>1</sup> In another letter from the APWU dated April 11, the Union requested information specific to the sites identified for advance implementation. That request was assigned Information Request IR13-14 and is being processed.



## American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

May 16, 2013

**Greg Bell**  
Executive Vice President  
1300 L Street, NW  
Washington, DC 20005  
(Office) 202-842-4250  
(Fax) 202-842-4297

### National Executive Board

**Cliff Guffey**  
President

**Greg Bell**  
Executive Vice President

**Elizabeth "Liz" Powell**  
Secretary-Treasurer

**Mike Morris**  
Director, Industrial Relations

**Rob Strunk**  
Director, Clerk Division

**Steven G. Raymer**  
Director, Maintenance Division

**Michael O. Foster**  
Director, MVS Division

**Bill Manley**  
Director, Support Services Division

**Shazryn M. Stone**  
Coordinator, Central Region

**Mike Gallagher**  
Coordinator, Eastern Region

**John H. Dirzius**  
Coordinator, Northeast Region

**Princella Vogel**  
Coordinator, Southern Region

**Omar M. Gonzalez**  
Coordinator, Western Region

Dear Local or State President:

Enclosed, for your information, you will find correspondence between the APWU and USPS regarding the Postal Service's decision to accelerate the consolidation of more than 70 mail processing plants that were originally scheduled for possible consolidation in 2014.<sup>1</sup>

The Postal Service's decision to accelerate consolidation of these plants reneges on the commitment the USPS made to communities, Congress and postal workers, and underscores the urgency of our continued struggle to get Congress to pass legislation that protects service standards and preserves the mail processing network.

The APWU's legislative outreach to members of Congress at the headquarters level, combined with the tireless efforts of locals and state organizations, continues to garner co-sponsors and support for the *Postal Service Protection Act* (H.R. 630 in the House and S. 316 in the Senate).

In addition, many locals have had success in persuading their members of Congress to send letters to the Postmaster General opposing mail processing consolidations.

However, the Postal Service continues to use the lack of action by Congress to justify moving forward with its mail processing consolidations plan. By accelerating plans to close mail processing centers, the Postal Service intends to make saving these facilities a moot point.

Enclosed you will find the following:

- April 10, 2013, Letter to USPS Labor Relations – Representing the APWU's position, request for information, and call for the Postal Service to cancel plans to accelerate implementation of these and any other consolidations.
- April 11, 2013, Letter to Labor Relations – Requesting information on specific discrepancies found between the list of 71 facilities identified for accelerated consolidation and previous AMP studies that the APWU either did, or did not, receive.

<sup>1</sup> The Postal Service's original network realignment plan called for the consolidation of 252 mail processing plants by the end of 2012. In May of 2012, it announced a modified consolidation plan that would result in the closure of 229 plants over two years – 140 consolidations by the end of 2013, following by another 89 by the end of 2014. The APWU filed a complaint with the Postal Regulatory Commission (PRC) in June 2012 seeking to prevent the Postal Service from implementing its consolidation plan and lowering service standards. However, the PRC denied the APWU's complaint.

Re: Accelerated Consolidations  
May 16, 2013  
Page 2

- April 24, 2013, Letter to Postmaster General Patrick Donahoe – Reiterating the APWU’s opposition to the USPS’s decision to accelerate the consolidation of mail processing plants and our request that the consolidations be postponed.
- April 25, 2013, Letter from USPS – In response to an APWU March 8, 2013, information request concerning the decision to advance the implementation of 18 consolidations from 2014 to 2013.
- May 1, 2013, Letter from USPS – In response to the APWU’s April 11, 2013, letter concerning the accelerated consolidations of more than 70 sites.
- May 9, 2013, Letter from USPS – In response to the APWU’s April 10, 2013, letter, informing the union that they have no intention of changing their plans to advance the implementation of the 71 identified consolidations.
- May 15, 2013, Letter from President Guffey to Congress – Asking them to support legislation that would provide the Postal Service financial relief, protect service standards, and preserve the mail processing network. It’s also intended to focus on the PMG’s violation of his commitment that the consolidations would not occur until 2014.
- A flyer suitable for distribution to the public about consolidations that is also available on [www.apwu.org](http://www.apwu.org).

In addition, by now you should be aware of the recent NLRB settlement requiring the Postal Service to provide the union with un-redacted copies of Area Mail Processing (AMP) studies and Post-Implementation Reviews (PIRs). A copy of the recent memo that was emailed to state and local officers explaining the settlement and how to obtain un-redacted copies of these studies is available at [www.apwu.org/dept/vp](http://www.apwu.org/dept/vp).

A careful review of these studies may reveal discrepancies or misstatements of fact that could help persuade your legislators that the Postal Service is not acting in good faith. If you have any questions about the NLRB settlement, AMP studies or need assistance in reviewing the un-redacted AMPs, contact my office or your regional coordinator.

If you have questions regarding the above correspondence, please contact me at 202-842-4250.

Yours in Union Solidarity,



Greg Bell  
Executive Vice President

Enclosures

GB/lbb  
opeiu#2, afl-cio



**American Postal Workers Union, AFL-CIO  
Mid Hudson Area Local**

P.O. Box 10116, Newburgh, NY 12552

Exhibit # 5  
6 pages

March 29, 2013

(This was forwarded to your office by Ed Kerner)

TO: Ed Kerner/Plant manager

Labor Relations Westchester District  
Bob Lukas

FROM: Debby Szeredy/President

SUBJECT: NLRB Settlement Agreement for Un-redacted copy of AMP Feasibility Studies, with the supporting data underlying each AMP study prior to public input meetings and a final Decision

The Mid-Hudson Area Local is requesting a complete un-redacted copy of the AMP study for the Mid-Hudson P. & D Center with all supporting data underlying this AMP study. We are also requesting all the documentation of comments, reports, memos, letters, post cards, petitions, e-mails, resolutions, etc that were collected during the 2011 Mid-Hudson Public Hearing and during the time period that consumers had to participate in the survey. This also would include the sign-in sheets at the Public Hearing in 2011. We know that the report you submitted regarding the public response was incomplete. The report was manipulated. This time we want all the public evidence.

We are also requesting that once the Mid-Hudson Area Local has received such requested information that within a reasonable amount of time for our review, a Public Hearing be scheduled in our area at a facility that is large enough to hold at least 500 people. The scheduling of the meeting should be conducive to our community as well.

Failure to abide by the NLRB Settlement Agreement will cause a new charge to be filed with penalties and fines to be included.

Sincerely,

Debby Szeredy/President  
Mid-Hudson Area Local

**AGREEMENT TO PROVIDE UNREDACTED COPIES OF  
APPROVED AREA MAIL PROCESSING FEASIBILITY STUDIES  
AND POST IMPLEMENTATION REVIEWS,  
SUBJECT TO LIMITED NON-DISCLOSURE**

**THIS IS AN AGREEMENT**, effective as of the date signed by the United States Postal Service, by and between the United States Postal Service, an independent establishment of the Executive Branch of the United States Government ("POSTAL SERVICE"), and the American Postal Workers Union, AFL-CIO, Local # 3722 with its principal place of business as Mid-Hudson Area Local ("APWU").

Newburgh, NY 12552 WITNESSETH

**WHEREAS**, the POSTAL SERVICE agrees to provide the APWU Local # 3722 with redacted and unredacted copies of approved Area Mail Processing ("AMP") Feasibility Studies and Post Implementation Reviews ("PIRs") concerning AMP's that impact employees working in facilities under their jurisdiction .

**WHEREAS**, the POSTAL SERVICE has asserted that the redacted portions of the AMP Feasibility Studies and Post Implementation Reviews contain restricted and confidential information ("CONFIDENTIAL INFORMATION"), in the nature of: names and addresses of persons, the public disclosure of which is prohibited by 39 U.S.C. § 412, as well as commercially sensitive disaggregated current and proposed volume, work hours and productivity information; and proposed transportation cost estimates;

**NOW, THEREFORE**, in order to protect the claimed restricted, sensitive and confidential nature of the CONFIDENTIAL INFORMATION, the POSTAL SERVICE and the APWU Local # 3722 agree as follows:

1. The APWU Local # 3722 shall be under no obligation to hold in confidence any information disclosed by the Postal Service in the redacted copies of the AMP Feasibility Studies and PIRs.

2. The APWU Local # 3722 acknowledges that the CONFIDENTIAL INFORMATION is not owned by the APWU, and that nothing contained in this Agreement shall give the APWU any right, title, or interest in the CONFIDENTIAL INFORMATION except as provided and limited by this Agreement. It is hereby understood and agreed between the parties, however, that the APWU Local # 3722 may make notes and/or make copies of the CONFIDENTIAL INFORMATION, subject to the restrictions set forth in this Agreement.

3. The APWU Local # 3722 agrees that it shall hold in confidence in perpetuity all CONFIDENTIAL INFORMATION, the disclosure of which is prohibited by 39 U.S.C. § 412 – i.e., the names and addresses of persons in the "Stakeholder Notification" portion of the AMP Feasibility Studies or PIRs.

4. The APWU Local # 3722 agrees that it shall hold all other commercially sensitive CONFIDENTIAL INFORMATION provided to it for a period of five (5) years from the date the CONFIDENTIAL INFORMATION is provided by the POSTAL SERVICE. For that five (5) year period, unless written consent is obtained from the POSTAL SERVICE, disclosure of any CONFIDENTIAL INFORMATION by the APWU Local # 3722 shall be restricted, and shall not be disclosed or disseminated, except to the following individuals ("RECIPIENTS"):

- a. Local president and official representatives of local unions affiliated with the APWU Local # 3722, including any grievance/arbitration advocate designated to handle any related grievance, subject to the terms of paragraph 5 of this Agreement; and
- b. Any arbitrator hearing any grievance or dispute involving the APWU and the POSTAL SERVICE, provided that: (i) the arbitrator is informed of the confidential nature of the CONFIDENTIAL INFORMATION; (ii) the arbitrator agrees to keep such information confidential and, (iii) to the extent the arbitrator relies on CONFIDENTIAL INFORMATION in his or her decision, the arbitrator and parties agree that any portion of the decision discussing CONFIDENTIAL INFORMATION will be maintained under seal.

5. The APWU Local # 3722 shall use the CONFIDENTIAL INFORMATION only for purposes related to the examination and consideration of the AMP Feasibility Studies and PIRs, and consistent with its duties as bargaining agent for the Postal Service bargaining unit

employees, and not inconsistent with any of the provisions of this Agreement. The APWU Local # 3722 shall use the same degree of care as it employs with its own confidential information, but in all events shall use at least a reasonable degree of care.

6. The POSTAL SERVICE shall provide unredacted copies of the approved AMP Feasibility Studies and PIRs to the individuals listed in sub-paragraph 4(a) of this Agreement only upon written request and only after obtaining a signed copy of this Non-Disclosure Agreement, signed by the individuals who will have access to the CONFIDENTIAL INFORMATION. The Local president of the Local union affiliated with the APWU (including Local # 3722 ) shall submit written requests for unredacted copies of the AMP Feasibility Studies and PIRs to the District Labor Relations Manager for the District in which the impacted facility or facilities are located. Any dispute that may arise between the parties at a particular local facility, should one occur, shall not have any effect or impact on this Agreement between the Postal Service and the APWU or any other locals affiliated with the APWU to the CONFIDENTIAL INFORMATION under the terms of to this Agreement.

7. The APWU Local # 3722 shall not remove any restricted, proprietary, copyright, trade secret, or other legend from any form of the CONFIDENTIAL INFORMATION.

8. The APWU Local # 3722 shall be under no obligation under the provisions of paragraph 3 to hold in confidence any CONFIDENTIAL INFORMATION which:

- a. Is or becomes public through no fault of the APWU Local # 3722 or the RECIPIENTS;
- b. Was known prior to the time of disclosure by the POSTAL SERVICE;
- c. Is properly received by it on a non-confidential basis from any third party who is lawfully entitled to make such disclosure;
- d. At the time of disclosure to the APWU Local # 3722 was known by the APWU Local # 3722 free of restriction as evidenced by documentation in possession of the APWU Local # 3722;
- e. Is required by a final court order, or an order of the National Labor Relations Board, to be disclosed without confidentiality restrictions; or

- f. Is independently developed by the APWU Local # 3722 without breach of this Agreement.
9. The parties shall designate representatives who are familiar with the information and data described in this Agreement who shall have the authority to resolve any technical issues of production of the information and data.
10. This Agreement expresses the entire agreement and understanding of the parties with respect to the subject matter hereof and supersedes all prior oral or written agreements, commitments, and understandings pertaining to the subject matter hereof. This Agreement shall not be modified or changed in any manner except in writing and signed by both parties.
11. The APWU Local # 3722 enters into this Agreement without prejudice to its position that such information, or any part of it, must be disclosed without necessity of the restrictions in this Agreement. The APWU Local # 3722 reserves the right to request disclosure of this information, or any part of it, without the restrictions contained in this Agreement, and to seek legal, administrative, and/or arbitral redress should the POSTAL SERVICE refuse. It is understood that the APWU, Local # 3722 unless the POSTAL SERVICE agrees otherwise, is obligated to comply with the terms of this Agreement until such time as a legal administrative or arbitral tribunal issues a final decision requiring disclosure without restrictions, or with different restrictions.
12. This Agreement shall not be cited and/or used as precedent by either the APWU Local # 3722 or the POSTAL SERVICE, except that either party may rely upon or cite to the terms of this Agreement in order to implement its terms, or in a grievance, arbitration or other dispute between the POSTAL SERVICE and the APWU Local # 3722 concerning the disclosure of confidential information relating to facility consolidation or closure.

IN WITNESS WHEREOF, the POSTAL SERVICE and the APWU Local # 3722 have executed this Agreement effective as of the date signed by the POSTAL SERVICE.

AMERICAN POSTAL WORKERS  
UNION, AFL-CIO Local # 3722

UNITED STATES POSTAL SERVICE

By: Debby Inzerly

By: \_\_\_\_\_

Title: President

Title: \_\_\_\_\_

Date: 5-28-13

Date: \_\_\_\_\_

# AMERICAN POSTAL WORKERS UNION, AFL-CIO

REQUEST  
FOR  
INFORMATION

MID-HUDSON AREA LOCAL P.O. BOX 10116 NEWBURGH, NEW YORK 12552

GRIEVANT/UNION Class Action/Szeregy	NATURE OF ALLEGATION AMP impact and feasibility studies	ARTICLES Article 5,12,17,19,31, JICM
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*Exhibit # 6*  
*2 pages*

*4-22-2013*  
DATE OF REQUEST:

TO: Ed Kerner TITLE: Plant Manager  
FROM: Debby Szeregy TITLE: Steward/President

SUBJECT: REQUEST FOR INFORMATION & DOCUMENTS RELATIVE TO PROCESSING A GRIEVANCE:  
WE REQUEST THAT THE FOLLOWING DOCUMENTS AND/OR WITNESSES BE MADE AVAILABLE TO US IN ORDER  
TO PROPERLY IDENTIFY WHETHER OR NOT A GRIEVANCE DOES EXIST AND IF SO, THEIR RELEVANCY TO THE GRIEVANCE

Copy of all memos, notes, documents, plans etc. that was made a part of the meeting held at Mid-Hudson with Albany Managers 4-10-2013

Copy of all transportation memos, notes, documents, plans etc. that were discussed at the Albany Mid-Hudson Meeting on 4-10-2013.

Copy of any and all documents, provided to a Congressional Member or other person on 4-11-2013 that had to be provided by Joseph Lubrano by 5pm on that date (that involved the Mid-Hudson AMP study)

Name of person or persons that were requesting documentation on the Mid-Hudson Plant from 4-10-2013 until present

RECEIVED  
APR 22 2013  
BY:

NOTE: ARTICLE 17, SECTION 3 REQUIRES THE EMPLOYER TO PROVIDE FOR REVIEW ALL DOCUMENTS, FILES, AND OTHER RECORDS NECESSARY IN PROCESSING A GRIEVANCE. ARTICLE 31, SECTION 2 REQUIRES THAT THE EMPLOYER MAKE AVAILABLE FOR INSPECTION BY THE UNIONS ALL RELEVANT INFORMATION NECESSARY FOR COLLECTIVE BARGAINING OR THE ENFORCEMENT, ADMINISTRATION, OR INTERPRETATION OF THIS AGREEMENT. UNDER 8a(5) OF THE NATIONAL LABOR RELATIONS ACT, IT IS AN UNFAIR LABOR PRACTICE FOR THE EMPLOYER TO FAIL TO SUPPLY RELEVANT INFORMATION FOR THE PURPOSE OF COLLECTIVE BARGAINING. GRIEVANCE PROCESSING IS AN EXTENSION OF THE COLLECTIVE BARGAINING PROCESS.

REQUEST APPROVED:

REQUEST DENIED:

DATE

DATE



# NOTICE TO EMPLOYEES



## POSTED PURSUANT TO A SETTLEMENT AGREEMENT APPROVED BY A REGIONAL DIRECTOR OF THE NATIONAL LABOR RELATIONS BOARD AN AGENCY OF THE UNITED STATES GOVERNMENT

### FEDERAL LAW GIVES YOU THE RIGHT TO:

- Form, join, or assist a union;
- Choose a representative to bargain with us on your behalf;
- Act together with other employees for your benefit and protection;
- Choose not to engage in any of these protected activities.

WE WILL NOT do anything to prevent you from exercising the above rights.

WE WILL NOT refuse to provide the American Postal Workers Union, AFL-CIO, with information that is relevant and necessary to its role as your bargaining representative of the following employees which constitute a unit appropriate for the purposes of collective bargaining within the meaning of Section 9(b) of the Act:

All maintenance employees, motor vehicle employees, postal clerks, special delivery messengers, mail equipment shop employees, and material distribution center employees, employed by the Respondent.

WE WILL provide the American Postal Workers Union, AFL-CIO, with unredacted copies of the completed Area Mail Processing (AMP) Feasibility studies that it requested on October 4, 2011.

WE WILL NOT in any like or related manner interfere with your rights under Section 7 of the Act.

UNITED STATES POSTAL SERVICE

(Employer)

Dated:

3/29/13

By:

*[Signature]*  
(Representative)

*[Signature]*  
(Title)

The National Labor Relations Board is an independent Federal agency created in 1935 to enforce the National Labor Relations Act. It conducts secret-ballot elections to determine whether employees want union representation and it investigates and remedies unfair labor practices by employers and unions. To find out more about your rights under the Act and how to file a charge or election petition, you may speak confidentially to any agent with the Board's Regional Office set forth below. You may also obtain information from the Board's website: [www.nlr.gov](http://www.nlr.gov) and the toll-free number (866) 687-NLRB (6572).

National Labor Relations Board, Region 5  
100 South Charles Street, Suite 600, Baltimore, MD 21201  
Telephone: (410) 582-2822  
Hours of Operation: 8:15 a.m. to 4:45 p.m.

Washington Resident Office  
1099 14<sup>th</sup> Street, NW, Washington, DC 20570  
Telephone: (202) 208-3000  
Hours of Operation: 8:15 a.m. to 4:45 p.m.

**THIS IS AN OFFICIAL NOTICE AND MUST NOT BE DEFACED BY ANYONE.**

THIS NOTICE MUST REMAIN POSTED FOR 60 CONSECUTIVE DAYS FROM THE DATE OF POSTING AND MUST NOT BE ALTERED, DEFACED, OR COVERED BY ANY OTHER MATERIAL. ANY QUESTIONS CONCERNING THIS NOTICE OR COMPLIANCE WITH ITS PROVISIONS MAY BE DIRECTED TO THE ABOVE REGIONAL OFFICE'S COMPLIANCE OFFICER.



Exhibit #7  
2 pages

**American Postal Workers Union, AFL-CIO  
Mid Hudson Area Local**

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May 29, 2013

General Counsel  
US Postal Service  
475 L'Enfant Plz SW Rm 6004  
Washington, DC 20260

Dear Brian,

I am contacting your office just in case you may want to meet to review PRC Case #C2013-3,4,5,6,7,8,9 for possible settlement language.

I have spoken to Pat Donahoe and he doesn't seem to want to slow down on the 55 Consolidation/Closings that are slated for this summer. I'm an optimist and I hope we can look at spending more time with the government who is reaching into our retirement monies. We need to hold off on any more movement of mail to other facilities, and concentrate on the monies we should be given the right to utilize. If you are interested in meeting to discuss the PRC Cases please contact me at 845-567-1866 or 845-705-6981. My address is P.O. Box 10116 Newburgh New York 12552.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read 'Debby Szeredy', is written over a large, light-colored checkmark or flourish.

Debby Szeredy  
Local President for  
Mid-Hudson Area Local

**Cc: PRC**

# PostalReporter News Blog

## Federal Government Loots USPS; Nobody Seems to Notice

APWU Web News Article 068-2013, May 28, 2013

When Treasury Secretary Jacob Lew told Congress last week of plans to take money from two federal employee retirement funds to avoid defaulting on the national debt, there was hardly a peep. No outrage. No dismay. Not even a question.

APWU President Cliff Guffey wants to know why not.

Guffey is ticked off because the federal government is taking a chunk of money that properly belongs to the Postal Service – while the USPS teeters on the edge of bankruptcy.

"Postal customers and employees have overpaid \$3 billion into the Federal Employees Retirement System, but Congress has refused to return the surplus – even while the USPS is forced to shutter thousands of post offices, close hundreds of mail sorting facilities, lower service standards, and delay mail delivery," he said.

"The government is helping itself to money that was paid by postal customers and employees, not taxpayers," Guffey pointed out.

"The federal government won't let the Postal Service touch that money, but they're taking it themselves," the union president said. "How brazen can they be?"

"The government has borrowed before from federal employee pension accounts and repaid the money," Guffey noted. "We fully expect it to be repaid this time as well. But that's not the point."

In addition to the federal pension funds, the Treasury is tapping the controversial Postal Service Retiree Health Benefits Fund. "The one that's bankrupting the USPS," Guffey said.

"The fund has more than \$46 billion in it that the government won't let the Postal Service use, even though the agency is on the verge of a financial collapse," he said, "but they're helping themselves to it."

Congress created the fund in 2006 when it passed the PAEA, which forces the Postal Service to pre-fund a 75-year liability in a 10-year period. The payments, which are approximately \$5 billion annually, account for approximately 70 percent of the Postal Service's current net deficit for the period from 2007 to 2012.

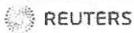
"Congress insists the USPS must pre-fund. They say the money must be there, but they don't object when the government grabs it," Guffey said.

Exhibit #8

January 15, 2013  
HUFF POST BUSINESS

# U.S. Postal Service Told To Speed Up Cost-Cutting Measures, Could Run Out Of Money By October

Reuters | Posted: 01/14/2013 7:24 pm EST | Updated: 01/15/2013 12:59 pm EST



By Elvina Nawaguna

WASHINGTON, Jan 14 (Reuters) - The U.S. Postal Service's Board of Governors has directed the cash-strapped agency to speed up cost-cutting and revenue-boosting measures, as legislation to restructure the mail carrier remains stalled.

The Postal Service didn't specify what measures it intends to pursue. Spokesman David Partenheimer said it will reveal those steps at a later date after informing postal employees of the details.

The 238-year-old institution has recently been bucking under the pressure of massive payments for future retiree benefits and dwindling revenue as more Americans communicate by email.

The agency lost almost \$16 billion in the past year, ran into its legal borrowing limit and defaulted twice on required payments to the federal government.

While it has tried to scale back its expenses, the Postal Service has been banking on Congress passing legislation to overhaul its operations and put it on sounder financial footing.

But with lawmakers consumed by budget fights and other priorities, the outlook for Postal Service legislation has not been good. Without quick action, the Postal Service could run out of money by October, according to some estimates.

"Citing the fact that the Postal Service cannot wait indefinitely for legislation, the USPS Board of Governors has directed management to accelerate the restructure of Postal Service operations to further reduce costs in order to strengthen Postal Service finances," the P. Service said in a statement on Monday.

Although the specific cost-cutting plan is unclear, the Postal Service's regulator warned that overly aggressive action could backfire.

Ruth Goldway, chairman of the Postal Regulatory Commission, said in an interview that the regulator had advised the Postal Service phase in cost-cutting measures.

"If they speed this up without the proper adjustments for managing the mail, they could really damage the quality of service," Gold said.

If the public feels that the new moves by the Postal Service lead to deteriorating quality of service, Goldway said, people can lodge complaint with the Postal Regulatory Commission, which would then review the measures taken.

"I do hope that Congress pays attention to this issue and moves as quickly as they can so that we don't have to have more rapid and drastic measures," Goldway said.

Since 2006, the Postal Service says, it has reduced its annual costs by about \$15 billion and shed about 168,000 jobs.

The postmaster general has been pushing to eliminate Saturday mail delivery, close some of its facilities, and alter its benefit payment obligations, but it needs congressional approval for the more significant measures.

Lawmakers such as Democratic Senator Tom Carper of Delaware and Representative Darrell Issa of California have pledged to make Postal Service legislation a priority in this Congress.

In a written statement, Carper said it was no surprise that the Postal Service would move forward on implementing cost-cutting moves, as it awaits congressional action.

But he says the Postal Service still needs a long-term solution.

"Unfortunately, the reality is that these piecemeal efforts undertaken by the Postal Service are likely not enough on their own to fundamentally fix the Postal Service's serious financial problems," he said.



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