

Article 37.3.A.2

Documentation

Explanation

All grievance paperwork	All paperwork developed and utilized in grievance procedure
Duty assignment(s) being reverted	Basis for dispute
History of duty assignment - initial and subsequent postings and awardings	Tells us how long job has been around and who has worked it
Written notification to Local APWU President	Collective Bargaining Agreement requires
Personnel memorandum which shows job being reverted	Ties down time (28 days to do) and gives management's reasons for doing
Paperwork which supports management's reasons, if applicable	Reversions allegedly based on operational changes should be supported by documentation - holds true for mail volume changes, automation, AMP, etc
Steward's interview with appropriate manager	Be sure it covers both procedure and merits. Make management be specific on why action taken. If no supporting documentation, challenge and note
Paperwork which supports Union's reasons why reversion improper	May involve volume reports, hours worked in a given operation before and after reversion, statements same job still being done - must specifically tie down by duties and hours each day
Paperwork on supplemental hours, if applicable	Has management given work to casuals, loaners, PTFs? If so, may also be a violation of Article 7.3.B
Paperwork on overtime hours, if applicable	Helps to show work still there and management action improper
Applicable case law. Remember difference between precedent and persuasive value	Strengthens case through Step 4s, national arbitrations or pre-arbs, regional arbitrations or pre-arbs. Cites must be on point