Mr. Lamont Brooks
Assistant Director
Clerk Craft Division
American Postal Workers Union, AFL-CIO)
1300 L Street, NW
Washington, DC 20005-4128

Re: USPS #Q10C-4Q-C15125503 APWU #HQTC20150333

Dear Mr. Brooks:

Recently we met in pre-arbitration discussions regarding the above referenced dispute. The interpretive issue in this dispute is whether the notices dated February 20, 2015 and March 31, 2015 regarding the Postal Service determination to eliminate scheme requirements from all clerk craft bid duty assignments is a unilateral action in violation of the Collective Bargaining Agreement (CBA). The APWU also challenged the Postal Service changes to dexterity training and the elimination of dexterity qualification requirements from bid duty assignments. The APWU incorporated this challenge into the dispute referenced above.

After further review and discussion, it is mutually agreed to resolve this dispute in accordance with the following:

- The Postal Service may continue to include scheme requirements on bid duty assignments. Such decisions will be made by management based on operational needs and in accordance with the M-5, Section 3.
- The parties agree that with the elimination of the Specialized Operations Networking Integrated Keyboard Systems (SONIKS), any required scheme or dexterity training will be provided manually unless and until the Postal Service develops new training methods. Scheme training and qualification will be in accordance with Article 37 and the M-5 Handbook.
- The Postal Service will update scheme and dexterity training materials as appropriate and notice will be provided to the APWU pursuant to Article 19 of the CBA.
- 4. Effective with the signing of this settlement agreement, the parties agree that for the purposes of the day to day assignment of overtime when needed, and in accordance with Article 8.5.C.1.a, scheme qualifications will be considered a necessary skill.

Accordingly, the parties agree that any case held pending this national dispute will be resolved in accordance with this agreement and local fact circumstances. If the parties are unable to resolve the cases held in accordance with this settlement agreement because they contain issues not covered by this agreement, they may continue through the Article 15 grievance/arbitration process.

Patrick M. Devine

Manager, Contract Administration United States Postal Service

Date: Uth S. L

Lamont Brooks

Assistant Director Clerk Division American Postal Workers Union

(AFL-CIO)

Date: