

Local Grievance # _____

Issue Statement (Block 15 on PS Form 8190):

Did management violate Article 29 of the National Agreement when they issued Letter Carrier **[name]** a notice of Revocation of Driving Privileges dated **[date]** and refused to reinstate his/her driving privileges, and if so, what should the remedy be?

Union Facts and Contentions (Block 17 of PS Form 8190):

Facts:

1. The grievant has **[number of years]** years of faithful service with the Postal Service. He/she has been involved in **[#]** vehicle accidents during his/her entire career with the Postal Service.
2. The Notice of Revocation of Driving Privileges states, “...**In making this determination, the following elements of your on-duty driving record have been carefully reviewed and considered:**”
3. The notice goes on to list **[number of dates]** dates where the grievant allegedly committed safety violations.
4. The first date was **[date]**. (List and explain the allegations for each entry)

Contentions:

1. The decision to revoke the grievant’s driving privileges under the circumstances in this case was unreasonable, and a violation of Article 29 of the National Agreement.
2. The agency failed to consider the fact that the grievant has been involved in just **[#]** vehicle accident(s) during his/her entire tenure of **[number of years]** years with the Postal Service. The grievant has driven **[#]** miles five days per week for **[number of years]** years. Therefore, the grievant has driven **[#]** miles for the Postal Service with only **[#]** vehicle accidents.
3. The agency also failed to consider and view the grievant’s explanation objectively for the day in question.
4. The agency hasn’t offered any evidence of the grievant receiving any meaningful refresher driver training.
5. The agency failed to consider the grievant’s tenure and discipline-free service as a mitigating factor in this case.

6. Any policy requiring revocation of Driving Privileges without giving all the considerations outlined in Article 29 and the MOU re: Reinstatement of Driving Privileges cannot be viewed as legitimate.
7. The grievant has been deprived of overtime opportunities he/she would have enjoyed if not for the revocation of his/her Driving Privileges from **[date]** forward.
8. Management failed to show that the grievant's on duty driving record warranted revocation of his/her driving privileges. The Union respectfully requests that an appropriate remedy be granted.

Remedy (Block 19 of PS Form 8190):

1. That management cease and desist from future violations of Article 29.
2. That the notice of Revocation Of Driving Privileges dated **[date]** and issued to Letter Carrier **[name]** be withdrawn and removed from all employee records and files effective immediately, and that the grievant be returned to driving duties without further delay.
3. That the grievant be made whole for all wages and benefits lost as a result of this action to include any overtime hours the grievant would have enjoyed if not for his/her driving privileges being revoked, or whatever remedy the Step B Team or an Arbitrator deems appropriate.



National Association of Letter Carriers Request for Information

To: _____
(Manager/Supervisor)

Date _____

(Station/Post Office)

Manager/Station _____,

Pursuant to Article 17 and 31 of the National Agreement, I am requesting the following information:

1. Copies of any and all documents, statements, records, reports, audio/video tapes, photographs, or other information learned, obtained, developed or relied upon by the Postal Service in revocation of _____'s driving privileges.

I am also requesting time to interview the following individuals:

1. Letter Carrier(s) _____.

Your cooperation in this matter, will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

_____ Request received by: _____

Shop Steward
NALC

Date: _____



National Association of Letter Carriers Request for Steward Time

To: _____
(Manager/Supervisor)

Date _____

(Station/Post Office)

Manager/Supervisor _____,

Pursuant to Article 17 of the National Agreement, I am requesting the following steward time to investigate a grievance. I anticipate needing approximately _____ (hours/minutes) of steward time, which needs to be scheduled no later than _____ in order to ensure the timelines established in Article 15 are met. In the event more steward time is needed, I will inform you as soon as possible.

Your cooperation in this matter will be greatly appreciated. If you have any questions concerning this request, or if I may be of assistance to you in some other way, please feel free to contact me.

Sincerely,

_____ Request received by: _____

Shop Steward
NALC

Date: _____