



National Association of Letter Carriers

July 28, 2015

Fredric V. Rolando
President

To Whom it May Concern

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RE: Ergonomics & Safety

The purpose of this statement is to assist NALC Stewards and Officers on the handling of ergonomics issues.

As background to my involvement on ergonomics in the USPS I offer the following:

Ergonomics enters the Letter Carrier Craft

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The USPS and the NALC committed to bringing the principles of ergonomics into customer service, following the positive outcome of the ergonomics program in mail processing. The USPS and the NALC pilot tested ergonomics in customer services in Albany, New York. Subsequently the USPS and the NALC agreed to select the San Diego District to expand ergonomics with other districts to follow.

I believe that in early 2005, USPS headquarters sent Loring Shiver and Eric Clark (both had oversight responsibility on ergonomics) to conduct a briefing for all unions and management in preparation for the San Diego District roll out.

Representatives from management and the craft unions were selected to be members of the ergonomics work team. During this time I was one of the Regional Administrative Assistants (RAA) for Region 1 of the NALC. In March of 2005 I was assigned by the NALC to undergo the two days of ergonomics training conducted by an ergonomist.

After this initial training, a number of other teams were developed for use throughout the entire San Diego District. In April of 2005 District

Manager John Platt and I participated in three on site Ergonomic Risk Reduction Program (ERRP) briefings in San Diego, San Bernardino and Palm Desert, so that all affected letter carriers and their managers were made aware of this program.

On August 1, 2005, San Diego District Manager John Platt and National Business Agent (NBA) Dale Hart issued a joint commitment letter addressing the value of ERRP.

Following the experiences and knowledge acquired through our joint efforts on ergonomics with customer service, the national parties decided to establish a document to share information with all parties in the field.

National Support for Good Ideas

On April 24, 2008, William H. Young, National President of the NALC and Doug A. Tulino, Vice President of Labor Relations, USPS Headquarters, memorialized their agreement on ergonomics tools (M#01773). This document included the following observations:

Consistent with its ongoing commitment to improve safety, the National Joint Labor-Management Safety Committee evaluated several tools designed to reduce injuries associated with lifting, loading, and handling mail. Pilot testing and the Customer Service Ergonomic Risk Reduction Process indicated that three of the evaluated tools may help reduce injuries and Muscular/Skeletal Disorders (repetitive motion injuries related to lifting, reaching, and handling cumbersome or heavier objects).

The three tools listed in the document are:

- Utility/Mail Hooks—plastic rods with a hook to extend the reach of the carrier in loading/unloading mail into and from Long Life Vehicles and Flexible Fuel Vehicles.
- Hamper Inserts—inserts used with 1046P hampers to raise the level of trays/tubs of mail loaded into the hamper, to reduce the lift height in loading and unloading the mail.

- Mail Elevation Units-"milk crates" used to elevate the height of trays and tubs of mail distributed to carrier cases, reducing bending and the lift height (but care must be taken to avoid increased twisting while lifting). Sort bins attached to carrier cases are also alternatives for raising flats off the floor. (Flats Sequencing System sites should coordinate plans for future equipment based on anticipated flat volume to be handled at the case.)

OSHA Job Safety Analysis Requirement

In addition to the signed national level agreement, the National Joint Labor-Management Safety Committee prepared a Job Safety Analysis (JSA) as required by OSHA as found in 29 CFR Section 1910.132(d)(2)¹ for each of the above three items (see attached).

Each of the three JSAs identify the "Job Description", the "Sequence of Basic Steps" needed to perform the task, the "Potential Hazards and Effects", and the identified "Safe Work Practice". The JSAs therefore establish what the USPS and the NALC at the headquarters level recognized as the safe way to perform each task.

Ergonomics in the Employee and Labor Relations Manual

Further, the Employee and Labor Relations Manual contains the following two relevant ergonomic references:

811.22 Vision Statement

¹ The employer shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated; the person certifying that the evaluation has been performed; the date(s) of the hazard assessment; and, which identifies the document as a certification of hazard assessment.

The Postal Service will become a leader in occupational safety and health for the federal government and private sector by demonstrating a commitment to integrating safe work practices into all of our services. The Postal Service is committed to participation in the OSHA Voluntary Protection Programs (VPP). (See 811.25.) **The Postal Service also engages in innovative safety efforts such as the Ergonomic Risk Reduction Program** and joint labor-management safety and health committees (see 816). (emphasis added)

833 Safety and Health in Design, Procurement, and Construction

833.1 Standards, **Ergonomics**, and Engineering: OSHA and applicable consensus safety and health standards, **ergonomic considerations**, and sound safety and fire protection engineering techniques **must be used** to plan, build, design, construct, modify, repair, and procure new equipment, vehicles, and facilities. **Consideration must be given to employee work environment**, equipment, tools, supplies used, and the material on which work is performed. Purchasing, **delivery, and engineering personnel must consult safety personnel to ensure that safety engineering, health protection, and ergonomic considerations are integrated into all activities of the Postal Service.** Managers responsible for purchasing, design, and construction are accountable for compliance with OSHA standards and applicable fire protection and building codes. (emphasis added)

NALC seeks to expand Ergonomics

During a number of opportunities since 2011, the NALC has repetitively surfaced ergonomics during our national safety task force meetings, seeking to further expand on this process.

Ergonomics in the EL-809

By letter dated November 13, 2013, (received by the NALC on November 14, 2013) the USPS provided the NALC with notice of Article 19 changes to the EL-809, Guidelines for Area/Local Joint Labor Management Safety and Health Committees. Attached to the notification letter is an explanation of the purpose of the changes and the anticipated impact.

In Section V the USPS explained the purpose to be:

Suggests including ergonomics as a permanent agenda item for each meeting to review ergonomics resources and provide possible solutions for their local sites.

This section also defined the anticipated impact to be:

Opportunity for reduction of MSD [Musculoskeletal Disease] related injuries and illnesses to employees at their sites.

In Section VII the USPS explained the purpose to be:

Provides available ergonomic resources to the local committee.

This section also defined the anticipated impact to be:

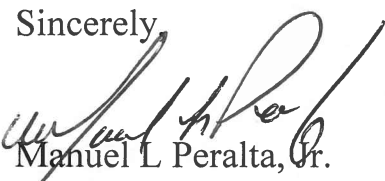
Provides ergonomic awareness on available resources.

The NALC did not contest the proposed changes and they have since been published and remain in effect as of the time of this preparation of this document.

It is my hope that this statement is of value to you understanding the evolution of the ergonomics process as I saw it through my duties as an RAA, NBA and now Director of Safety and Health. Further, we encourage you to use this information to raise suggestions on ergonomic at your work location.

If you have any questions on this matter, please contact me at 202-662-2831.

Sincerely,



Manuel L. Peralta, Jr.
Director, Safety and Health