

**SETTLEMENT AGREEMENT
BETWEEN THE
UNITED STATES POSTAL SERVICE
AND THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO**

Re: POSTPlan Staffing Violation Remedy Agreement - Case No. Q10C-4Q-C 15206043

In accordance with the terms of this Settlement Agreement, the parties agree to a full and final resolution and remedy of pending disputes involving the POSTPlan Staffing Violations as identified in Arbitrator Stephen Goldberg's June 7, 2017 award in the above-referenced national level case, and grievances held pending the outcome of the issues in the above-referenced national level case as follows:

1. In compliance with the Goldberg Award, the parties have identified the number of hours improperly denied Clerk Craft employees that were worked in Level 4 or Level 6 Remotely Managed Post Offices (RMPOs) subsequent to December 22, 2014.
2. The Goldberg award provided that those Postmaster Relief (PMR) hours which the Postal Service could prove were spent performing work outside the Clerk Craft, or in performing window work in the unavailability of any trained Clerk Craft employee to perform that work, should be excluded from the calculation of hours improperly denied Clerk Craft employees.
3. Arbitrator Goldberg ordered that the same process is to be applied to work improperly performed by Postal Support Employees (PSEs) in Level 18 Post Offices subsequent to December 22, 2014.
4. Based on the arbitrator's ruling in this case, the parties have in good faith determined the appropriate remedy.
5. To satisfy the monetary remedy, the Postal Service will make payments totaling forty-nine million, nine hundred thousand dollars (\$49,900,000) to Clerk Craft bargaining unit employees to be identified by the Union. Ten percent (10%) of this payment will be held by the Postal Service in escrow to be disbursed at a later date and in a manner to be determined by the Union.
 - A. The Postal Service will cooperate to the extent possible to assist the Union in obtaining the information necessary for identification of the Clerk Craft employees entitled to payments in accordance with this agreement. This information will include, but is not limited to, reports of Clerk Craft bargaining unit employees (both career and PSE) on rolls, in POSTPlan offices subsequent to December 22, 2014 through the date of this remedy agreement.
 - B. The APWU will provide to the Postal Service a list of the Clerk Craft employees to be paid. The list will include the full name, Employee Identification Number (EIN), duty station, and amount to be paid, for each employee the Union determines is entitled to payment.
6. The parties acknowledge that Local/Area grievances directly related to this national dispute were filed locally in some locations. Those grievances may involve other issues which remain outstanding. The parties agree that this Settlement Agreement satisfies all monetary remedies requested by those local grievances directly related to the national dispute;

however, the parties may address the remaining outstanding and non-monetary issues in accordance with the Article 15 grievance/arbitration procedure at the local level.

7. Except as provided herein, it is understood by the parties that this Agreement is a full and final resolution of the grievance and disputes set forth in national case #Q10C-4Q-C 15206043. The Postal Service will be relieved from any further liability concerning this dispute.



Rickey R. Dean
Manager, Contract Administration
United States Postal Service

Date: 02/09/2018



Lamont Brooks
Assistant Clerk Craft Director
American Postal Workers Union, AFL-CIO

Date: 02/09/2018