

Contract Talk by the Contract Administration Unit

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Brian Renfroe, Executive Vice President
Lew Drass, Vice President
Christopher Jackson, Director of City Delivery
Manuel L. Peralta Jr., Director of Safety and Health
Dan Toth, Director of Retired Members

Vehicle fires in an aging fleet

As has been previously written in *The Postal Record*, USPS is testing prototypes for the Next Generation Delivery Vehicle (NGDV) with the goal of replacing its aging fleet of Long Life Vehicles (LLVs). With the full deployment of the NGDV still months down the road, letter carriers will be operating LLVs for the foreseeable future.

As LLVs continue to age, the threat of vehicle fires and the risk to letter carriers increases. Letter carriers need to be aware of their rights and responsibilities when operating Postal Service vehicles and the steps to take should problems arise. In addition, shop stewards and branch officers should hold management accountable for proper maintenance and repairs to the fleet.

The Postal Service is required to provide safe working conditions for all employees. This requirement includes ensuring vehicles are maintained and safe to operate. Sections 1 and 2 of Article 14, on pages 56 and 57 of the 2016-2019 National Agreement, state in part:

Section 1. Responsibilities

It is the responsibility of management to provide safe working conditions in all present and future installations and to develop a safe working force.

Section 2. Cooperation

The Employer and the Union insist on the observance of safe rules and safe procedures by employees and insist on correction of unsafe conditions. Mechanization, vehicles and vehicle equipment, and the work place must be maintained in a safe and sanitary condition, including adequate occupational health and environmental conditions. The Employer shall make available at each installation forms to be used by employees in reporting unsafe and unhealthful conditions.

Letter carriers recognize that many LLVs are worn out and in need of repair. Repairs should be prompted by your daily inspection of the vehicle, which is your responsibility in accordance with Section 832 of *Handbook M-41, City Delivery Carriers Duties and Responsibilities*, and Section D of *Handbook EL-814, Postal Employees Guide to Safety*, below.

M-41 Section 832: Inspecting Vehicle

832.1 Inspect vehicle as described on Notice 76, Expanded Vehicle Safety Check (see exhibit 832.1) for deficiencies, body damage, or inoperable items.

EL-814 Section 10.D:

D. Vehicle Regulations

1. Vehicle Safety Inspections

Make a daily safety check of your assigned vehicle as outlined in Notice 76, Expanded Vehicle Safety Check, before leaving the post office parking lot or garage.

USPS Notice 76 is a checklist of 27 specific items that should be inspected prior to operating any postal vehicle, whether right or left-hand drive. A sample of the checklist is seen on page 84 of the *Handbook M-41*. Letter carriers also should inspect the vehicle upon returning to the office to determine if any issues arose while delivering on the street. Mechanical defects or failures as well as major body damage should be reported as soon as they are discovered, as stated in Section 842 of the *Handbook M-41*:

842.1 Reporting Defects

Driver must (a) report all mechanical defects or failures and major body damage on Form 4565, Vehicle Repair Tag (see exhibit 842.1) as soon as noted, and (b) immediately turn in the completed form to a dispatcher or manager. Minor body damage can sometimes await repair until the next regular inspection and need not be reported more than once.

842.2 Preparation of Form 4565

Whenever a motor vehicle requires repairs, complete Form 4565 in triplicate as follows:

- a. Enter vehicle number and the hour and date vehicle was checked in.
- b. Put check mark opposite item requiring repair, or, if not listed, enter opposite Other Repairs.
- c. Describe details of repair under Remarks. For example, if brake block is checked, state: pulls to the right, brakes fading, etc.

842.3 Disposition of Form 4565

842.31 Deliver to the garage dispatcher or manager for initialing. Driver copy will be returned to you and should be kept as proof that damage was reported.

842.32 Attach dispatcher copy to Form 4570.

842.33 Mechanic copy is sent to the garage with vehicle.

The *Postal Operations Manual* Section 736, Fleet Maintenance, states:

The VMF [Vehicle Maintenance Facility] is responsible for providing quality and timely maintenance to the Postal Service fleet as outlined in the guidelines established by Vehicle Maintenance, Headquarters.

Management should contact the VMF promptly upon submission of PS Form 4565, Vehicle Repair Tag, to initiate repairs. A second copy of PS Form 4565 should be provided once repairs are complete. Carriers should request a receipt of this document before putting the vehicle back in use.

If the vehicle is used fewer than 500 miles per month, it is to undergo routine servicing twice a year (26-week cycle). If driven more than 500 miles per month, it is to

Vehicle fires in an aging fleet (continued)

undergo servicing three times a year (17-week cycle). Letter carriers should request proof that vehicles are being properly serviced. If proper servicing is not taking place, carriers should contact their steward to investigate why the vehicles are not being properly maintained. USPS created PS Form 4546-B, United States Postal Service Preventive Maintenance Inspection Guidelines Light Delivery Vehicles, to identify the required elements of routine maintenance and to document that the maintenance was performed.

Whether the Postal Service completes the required maintenance itself or contracts out the work to non-postal facilities, letter carriers have the right to verify that routine maintenance is taking place. If the maintenance is not being completed, letter carriers should submit PS Form 1767, Report of Hazard, Unsafe Condition or Practice. They should speak to a shop steward or branch officer and, if necessary, initiate grievances, citing Article 14 of the 2016-2019 National Agreement.

If a vehicle fire occurs, stewards and branch officers should investigate to determine if management's failure to perform routine maintenance was a contributing factor. Use the steps below to determine what went wrong and how to correct the problem:

1. Request and review the vehicle maintenance records for the vehicle involved in the fire/mishap, then determine whether USPS conducted a required preventative maintenance inspection (PMI).
2. Request copies of PS Form 4546 for the involved vehicle. Review the forms and compare them with the PMI guidelines for light delivery vehicles beginning on page 22 of Vehicle Maintenance Bulletin V-07-98 found on the NALC website at nalc.org/safety.
3. If necessary, interview the mechanics (postal or contractor) to make sure that the inspection/PMI was done correctly.
4. Interview the carrier to determine what he or she recalls of the events leading up to the fire or equipment failure.
5. Prior to the fire or equipment failure, were we conducting thorough vehicle inspections? If so, did we report any items on PS Form 4565, Vehicle Repair Tag?
6. Was the vehicle properly serviced? If not, what did management do with the vehicle? Request copies of any and all repair tags submitted and resulting repairs.



On April 11, 2011, USPS issued Vehicle Maintenance Bulletin 04-11 (VMB-04-11), establishing the policies and procedures related to the reporting of fires involving USPS-owned vehicles. Stewards, branch presidents and regional union officials should ensure that these policies are being

followed when such incidents occur. Proper reporting assists USPS in identifying the causes of vehicle fires, thereby helping in prevention efforts.

Current business and safety needs require USPS to document the number and nature of Postal-owned vehicle fires. This information is necessary to pin down root causes, and to capture the data needed to determine commonalities, in these fires.

The following is a list that may prove helpful in your investigation and should be included in any grievance file. The information can be accessed on the NALC website at nalc.org/safety.

- PS Form 4546-B, United States Postal Service Preventive Maintenance Inspection Guidelines Light Delivery Vehicles
- Notice 76, Expanded Vehicle Safety Check
- Vehicle Maintenance Bulletin V-07-98—Preventive Maintenance Inspection Program
- *USPS Fleet Management Handbook PO-701*, rev. 2008
- June 10, 2014, OIG Management Advisory Report on delivery vehicle fleet replacement
- Aug. 5, 2014, letter from Phil Knoll, USPS manager of delivery programs, on proper maintenance and vehicle fire prevention
- Feb. 10, 2015, OIG report noting management's failure to properly maintain vehicles
- April 3, 2015, letter from Phil Knoll, USPS manager of fleet management, on proper maintenance and vehicle fire prevention
- August 2016 letter from Phil Knoll, USPS manager of fleet management, on the potential causes of vehicle fires
- Sept. 30, 2016, letter from Kevin McAdams, USPS vice president of delivery operations, on vehicle inspections and maintenance

Unfortunately, vehicle fires are a reality and letter carriers need to protect their personal safety. Instances have been reported in which letter carriers have unloaded mail and parcels while the vehicle is on fire. Preserving mail is an admirable intention, but do not put your safety at risk. Your safety is always priority No. 1!