

DECLARATION OF JOAN LEVY

I, Joan Levy, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the president of the Greater Connecticut Area Local No. 237 of the American Postal Workers Union (APWU).
2. Nationwide, APWU fights for dignity and respect on the job for more than 200,000 United States Postal Service (USPS) employees and retirees. The Connecticut local has 1,200 members spread over 200 post offices statewide. Our members are clerks, maintenance staff, or work in USPS' Motor Vehicle Service (MVS) or Vehicle Maintenance Facilities.
3. I have compiled the information in this declaration through personal knowledge and through review of documents and information provided to me by union members and officers statewide and nationally. I am in regular contact with members of my local across the state and with the presidents of Connecticut's three other APWU locals, which are based in Hartford, Stamford, and Danbury. In addition, I have personally visited 50 post offices statewide in just the last few months.
4. I also have significant personal knowledge of the workings of the USPS in Connecticut from my 28-year career as a clerk. I retired from the USPS in 2018.
5. From the time I began working at the USPS in 1979 and until just a few months ago, my colleagues and I were guided by a core directive: "Every piece, every day." We understood ourselves to be responsible for ensuring that all mail received in each post office, every day, was sorted and delivered. In every Connecticut post office I am familiar with this directive was taken seriously.

6. Unfortunately, since approximately July, that core directive no longer seems to govern the operations of the USPS in Connecticut. In my experience as a clerk and as local president, I have never seen the kinds of sorting and delivery delays and mail backlogs that are now routine in post offices across Connecticut. It is now no longer unusual for mail to be left, unsorted, in post offices. I am familiar with the now-routine delays in the state's post offices and processing facilities from my own observations and from reports from union members.

7. I also have direct experience with these delays. For example, my union office, located in North Haven, Connecticut, sends out biweekly paychecks to employees and contractors. The checks travel by First-Class Mail from North Haven to a USPS processing center in Hartford. They then travel to their destination post offices, often in towns in the same small geographic region. For years, those checks used to take, at most, two days to reach their in-state recipients. Now they take a full week to travel just a few miles across one of the nation's smallest and most compact states.

8. In June, the USPS administration began removing key mail processing and sorting equipment from facilities in Connecticut. I received a document from the APWU National Union that states that the USPS intends to remove 671 pieces of processing equipment by the end of September. A true and correct copy of the document I received is attached as Exhibit A.

9. Last week, I visited the mail processing center in Wallingford, Connecticut. I saw two mail processing machines known as Delivery Bar Code Sorter machines taken out of service. They were disassembled but still located on the work floor. I also heard from the APWU Hartford Local President that four mail processing machines were taken

out of service at the Hartford processing center. Those machines were disassembled and moved outside to a parking lot.

10. Based on my experience as a clerk, some of the machines being removed from Connecticut are capable of sorting upwards of 30,000 pieces of mail every hour. When they are working, the machines do the critical work of sorting mail not just by destination post office but also by letter carrier route and by address within the route. This automation means that mail arrives at its destination post office already sorted and ready for delivery. When the machines are removed, mail arrives at its destination post office still unsorted. Postal staff must fill in the gaps by hand-sorting mail. Clerks must spend time sorting the mail by letter carrier route, and the letter carriers must then sort the mail by address within the route.

11. Earlier this year, the Postmaster General issued directives to change certain mail processing policies. These new directives have caused many offices in Connecticut to dramatically curtail the use of overtime. In my experience, even in optimal circumstances – with all machines online, and at full staffing – USPS has used overtime to ensure that staff have the time to deliver every piece, every day even during periods of peak demand like the holiday season. But eliminating overtime during the COVID-19 crisis, while also removing processing machines, has increased the burden on postal workers.

12. COVID-19 has increased demand for the postal service while decreasing the supply of postal workers. As president of the local, I know from reports from the labor relations manager that many APWU members in Connecticut have fallen ill with COVID-19. Many others are unable to work because of their obligations to take care of out-of-school children or other relatives. In the offices that have curtailed overtime, this means fewer

staffing hours to do more work. As a result, I have seen that mail backs up and goes unsorted and undelivered.

13. Since the Postmaster General announced that he was postponing some of the policy changes, I have heard that some offices in Connecticut continue to curtail use of overtime.

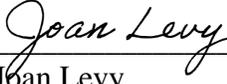
14. Delays due to curtailed overtime are exacerbated by new service changes that require trucks carrying mail for destination post offices to leave processing facilities at strictly fixed times, even if mail for those destinations remains unsorted and not yet loaded on the trucks. That mail, left behind, piles up in processing centers. That unsorted mail, too, cannot be delivered that day. The result, predictably, are even greater backlogs and delays. I am not aware of whether these service changes have been revoked since the Postmaster General's announcement about postponing policy changes.

15. These routine delays are deeply concerning at any time of year. Connecticut residents and businesses alike rely on USPS for medicine, checks, legal documents, and other critically important mail.

16. For as long as I have worked at USPS and as a union official, it has been USPS practice in Connecticut to afford special priority to election mail. When I was a clerk, management made clear to postal workers that it was our responsibility to bend over backwards to timely deliver ballots. I took pride in playing an important role in ensuring the right of Connecticut residents to vote. I am not aware of any plans for election mail in place since the Postmaster General stated that election mail will be afforded priority status.

17. In the past, USPS has taken steps to prepare for predictable increases in mail volume. Around the holiday season, for instance, USPS has typically hired temporary workers and increased overtime availability to ensure that postal workers are able to deliver on time. I am not aware of any steps that USPS in Connecticut has taken to prepare for increased mail volume around the November election season.

Executed this 8th day of September, 2020 at North Haven, CT.



Joan Levy
President, Greater Connecticut Area Local
American Postal Workers Union