



TEAMSTERS LOCAL UNION NO. 315

Affiliated With The International Brotherhood Of Teamsters

Teamsters General Truck Drivers, Chauffeurs, Warehousemen & Helpers in Contra Costa, Napa & Solano Counties, Automotive Employees in Contra Costa County, Bakery Wagon Drivers, Salesmen, Transport & Inside Workers in Napa, Solano, San Francisco, San Mateo, Marin, Sonoma, Lake and Mendocino Counties, California.

ALBERTO RUIZ
President

DON E. GARCIA
Secretary-Treasurer
Principal Officer

December 4th, 2017

Brian Person, UPS Regional Labor Relations Coordinator
United Parcel Service
4455 7th Ave South
Seattle, WA, 98108

Via Certified-Regular Mail

Re: 70 Hour Workweek Implementation

Dear Mr. Person,

This letter is Teamsters Local 315's response to the Company's recent notification of its intent to unilaterally implement an 8-day / 70-hour workweek for our package drivers' Hours of Service. This new rule is a clear indication to us that the Company failed to staff for the annual and largest peak season: the holidays. The parties bargained to permit the Company to make unlimited seasonal hires in recognition that the seniority workforce is insufficient to handle peak season needs. Instead of utilizing this contractually bargained staffing tool, the Company has decided to exhaust its seniority workers' health through excessive overwork. This sends a message to our local Union that the Company does not feel accountable for the health of their hard-working employees, nor are they looking out for core family values during the holiday volume season.

Teamsters Local 315 understands the significance of peak season and that every member must chip in. Our members work hard for UPS and care about its success. The business's core values lie in delivering family gifts to vendors and customers, but the Company's new hours of service strategy places our members' health at risk, mentally and physically. I don't think I am engaging in hyperbole when I state that it is immoral to subject our members to extreme work schedules in order to compensate for the Company's failure to hire seasonally.

Our legal staff is reviewing the legal and contractual validity of the 70-hour work week as applied in Nor-Cal. We demand to sit down and bargain over this change in working conditions and the impacts of this last minute decision on our members' lives.

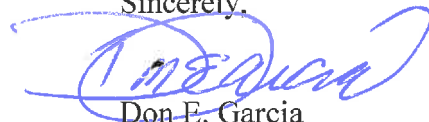
We also hereby request the following documents:

1. All documents referring or related to the Company's decision to implement the new hours of service rule, including but not limited to all correspondence with (to and from) the state and federal agencies that regulate driver hours of service rules;

2. All documents referring or related to the October 12 and 19, 2017 meetings between the Company and the Union regarding the Company's seasonal staffing plan;
3. All Company memoranda regarding potential effects on the seniority workforce from the Company's decision;
4. All documents showing the total number of seasonal hires and for each such hire, the total number of hours worked, for each of the prior two years.

In the meantime, we demand that you immediately cease-and-desist this 8-day/70-hour work week. In the event that the 70-hour workweek schedule remains, we will work to apply all legal and lawful action to prevent the deterioration of our members' health and respect. In 1916, the Company's founder James Casey approached the Teamsters to organize his Company's workers. As Casey once said, "Ideals of our company cannot be carried out from the top alone. They must become a part of the makeup of our entire organization. They must be instilled in the minds of all men down through the ranks." Putting profits over people is a short-sighted practice, and our members are what truly drive business for the Company.

Sincerely,



Don E. Garcia
Secretary-Treasurer

DG/jm

Certified Mail No. 7017 1450 0000 8232 3742

CC: Alberto Ruiz, President, Teamsters Local 315

Marty Frates, Nor Cal Chairman

Andy Marshall