



February 9, 2010

James R. Davis, Jr.  
Director, Potomac Verizon Labor Relations  
1 E. Pratt Street  
10N17  
Baltimore, MD 21202

Re: Executive Level Grievance – Failure to Administer Article 35 Properly – Employees Layed Off Improperly Classified Voluntarily Separated

Dear Jim,

This is an Executive Level Grievance related to Verizon's failure to administer Article 35 properly. Over 90 CWA members were forced off the payroll on January 30<sup>th</sup> and were classified as voluntarily terminating their own employment. When Verizon declares a surplus under Article 35 and the number of available jobs is not equal to the number of employees they have declared surplus – by any reasonable definition – that is a lay off. According to Verizon Labor Relations Director, James Davis, only 5 jobs remained from the original canvas list on January 30<sup>th</sup>. By Verizon's failure to properly classify those employees separated from the payroll as **involuntary** those employees lost additional healthcare benefits.

CWA grieves on behalf of all affected bargaining unit employees within the jurisdiction of District 2.

CWA demands an immediate correction to the status of these layed off employees and further demands any member who suffered any loss of benefit be made whole and compensated accordingly. CWA seeks Verizon's immediate compliance with the terms and conditions of the General Agreement.

The following data request is made in reference to this grievance:

1. Identify the total number of employees affected by the 2009 Declared Surplus.
2. Identify the total number, by title and location, of known available jobs applicable to the 2009 Declared Surplus.
3. Identify the total number of employees accepting the voluntary EISP relative to the 2009 Declared Surplus.
4. Identify the total number of employees affected by the 2009 Declared Surplus who accepted a lateral move, promotion and/or downgrade.
5. Identify the total number of employees forced off the payroll as a result of the 2009 Declared Surplus.

I would like to meet with the company to discuss the grievance. Please contact me with available dates on 301 809-4164.

Sincerely,



Gail Evans  
Administrative Director

GE/dt

cc: Ronald Collins  
Jimmy Tarlau  
District 2 Staff  
Local Presidents

opeiu#2-afl-cio