



August 1, 2010
 Organization file # 017820501
 USPS TRACKING# **7006 2150 0001 4861 6966**

To: Liz Dewald
 Labor Relations
 1400 Douglas Street STOP 0710
 Omaha, NE. 68179-0710

Dear Liz,
 This will serve as my formal notice of appeal to you for the following claim:

Craft/Title	Engineer
Claimant	JW Amsbury
EMP ID	244214
Claim Date	06/19/2010
=PE/Receipt for Claim #	017820501
Declination #:	0178205
Amount Claimed	\$212.38

On Claim Date Claimant was:

Assigned At:	WD640
Working Assignment:	0019
Working From Board:	XE01

ADDITIONAL SPECIFICS OF CLAIM:

The payment should be made of \$212.38 for a 130 mile basic day for working off assignment. I.A.W. with the Yost Award(Denver Hub Agreement) number II seniority and work consolidation, Mr. Foley is not required to protect Pueblo trains from his current extra board WD640 XC01. He is only required to protect trains that are in zone 1 Denver.

ARGUMENT:

Claimant was authorized by corridor manager CHP to work off of his assignment WD640 XE01 0019 to go on to the Colorado Spring subdivision to dog catch CEGEY1 18 and bring it into the Denver Terminal when Pueblo extra board crews were available. Please review his work history that is attached to this claim for evidence.

Specific, relevant agreement provision(s) and/or arbitration award(s) supporting claim:

The Denver Hub Agreement and a previous time claim that was paid by UP Labor relations department.

II. Seniority and Work Consolidation.

The following seniority consolidations will be made:

B. The new UP/UTU seniority districts will be divided into the following three (3) Zones:

1. **Zone 1** will include Denver east to but not including Sharon Springs and the Oakley extra board, Denver north to but not including Cheyenne, Denver west to and including Bond and Axial, Pueblo east to Horace, and all road and yard operations within the Denver Terminal including any road switchers at Colorado Springs.

Note: The Oakley extra board is part of the Denver Hub and assignments at Oakley will be filled by the Denver Hub. The reference to Sharon Springs is for pool freight service and the work normally protected by the oakley extra board shall continue as part of the Denver Hub.

2. **Zone 2** will include Grand Junction to Denver (long pool only), Grand Junction to Montrose, Oliver, Minturn (not including Minturn helper service) and Bond and yard assignments.

3. **Zone 3** will include Pueblo to Denver, South Fork, and Minturn and to Dalhart not including Dalhart, but including Minturn helper service and yard assignments.

4. Road, road/yard or yard extra boards will not be part of any zone if they cover assignments in more than one zone. Extra boards that cover assignments in only one zone will be governed by zone rules and the current rules of the collective bargaining agreement for this Hub.

Respectfully

Cullen Kemper
Local Chairman UTU 953C