

6. Daily vehicle utilization reports for each car used by any GS-360 grades 11-15, since June 18, 2000 (see attached Form HUD 21016).
7. All Daily Vehicle utilization reports for each car used by any GS-10 and below, since June 18, 2000 (see attached Form HUD 21016).
8. All Daily Vehicle utilization reports for each car used by all other bargaining unit employees, since June 18, 2000 (see attached Form HUD 21016).
9. All documents indicating travel on Saturday or Sunday by GS-360 grades 11-15 during hours corresponding to their normal tour of duty, since June 18, 2000.
10. All documents indicating travel on Saturday or Sunday by GS 10 and below during hours corresponding to their normal tour of duty, since June 18, 2000.
11. All documents indicating travel on Saturday or Sunday by all other bargaining unit employees during hours corresponding to their normal tour of duty, since June 18, 2000.
12. All documents indicating travel by any GS-360 grades 11-15 on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
13. All documents indicating travel by any GS-10 and below on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
14. All documents indicating travel by all other bargaining unit employees on a weekday, prior to the beginning of their normal tour of duty, since June 18, 2000.
15. HTMS records indicating time of Departure and time of arrival for GS-360 employees on travel since June 18, 2000.
16. HTMS records indicating time of Departure and time of arrival for GS-10 and below employees on travel since June 18, 2000.
17. HTMS records indicating time of Departure and time of arrival for all other bargaining unit employees on travel since June 18, 2000.
18. All HUD forms 25017 for each bargaining unit employee since May 1, 1998.

Particularized need: The Union believes that the Agency has violated the Grievants' rights to be properly compensated with Overtime Pay for work performed by the Grievants. The Union needs the requested information to prove the underlying facts and contentions in its Grievance.

The information is needed to indicate the amount of employees within the FHEO and 360 series, their corresponding work load and case load. The Union was believes that the work load/case load are indicative of working overtime hours in order to have case turnaround pursuant to HUD regulations.

Travel documents are needed to prove that Grievants did Agency work before their tour of duty, beyond their tour of duty, worked through lunch, on traveling days. These travel documents are also needed to demonstrate that Grievants have done Agency work and traveled on behalf of the Agency on weekends without compensation.

The vehicle logs are required to show the usage of government vehicles outside of normal tour of duty hours without compensation or without proper compensation.

HUD forms 25017 will show the exact tour of duty selected by bargaining unit employees.

NOTICE:

The information requested should be provided as it becomes available and not kept back until it is all ready. In the interest of transparency, it is requested that the Agency provide information to the Union in 15 days, as agreed, as to which documents it intends to provide on time, which it intends to provide but not on time, and which documents it intends to not produce (and why).

Sincerely,

Michael J. Snider, Esq.

Carolyn Federoff, President
AFGE Council of HUD Locals 222