



## American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

January 28, 2020

**Michael O. Foster**  
Director  
Motor Vehicle  
Service Division  
202-842-4240 (Office)  
202-842-8517 (Fax)

Sent by Facsimile and First-Class Mail

**Rickey Dean, Manager**  
Contract Administration  
United States Postal Service  
475 L'Enfant Plaza SW  
Washington DC 20260

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Coordinator, Northeast Region

Kennith L. Beasley  
Coordinator, Southern Region

Omar M. Gonzalez  
Coordinator, Western Region

Re: **First Article Test of the Mercedes Metris Right Hand Drive (RHD) Van  
Manufactured by Mercedes-Benz**

Dear Rickey,

On January 15-16, 2020, certified national APWU representatives attended the First Article Test (FAT) of the Mercedes Metris Right Hand Drive (RHD) Van manufactured by Mercedes-Benz.

The APWU submits the following concerns and issues for response, pursuant to Article 39.3.B of the Collective Bargaining Agreement, in the interest of Safety and Health and other considerations.

1. The main issue of concern for the testers was the visibility. The vehicle was equipped with only the standard mirrors that come on any passenger vehicle. There was the two (2) side mirrors, and the one (1) rearview mirror. The left-side mirror doubles as a convex mirror. The left-side sliding door was equipped with a window allowing for more vision to the left than the current long-life vehicles (LLVs) used by the Postal Service. However, there were many blind spots/areas that would not allow the driver to safely operate/maneuver this vehicle without some sort of assistance.
  - a. There were no pot lid mirrors attached to this vehicle.
  - b. The rearview mirror served no purpose at all. A plate attached to the cage was blocking the view.
  - c. There were discussions of installing/mounting a camera on the rear of the vehicle to act as a rearview mirror.
  - d. There was also no visibility of the front of the vehicle at the curb. Mailboxes and other objects are not visible. The vehicle has no assistive device(s) to enable viewing, or being made aware of, items at the curb. Sensors mounted to the vehicle could alert the driver of close objects.
2. The rear cargo area was poorly lit, there was not enough light to distinguish items.
3. Shelving in the rear cargo area is too short. There is room for lengthening the shelving.

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Rickey Dean  
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4. The driver door opening was too high from the ground to access mailboxes.
5. The mail tray front bracket is very weak, and the tray is too low.
6. Sliding door rollers and brackets are also very weak.
7. There was a recommendation that a jump seat be installed for training purposes.
8. The vehicle was equipped with key fobs. We were told that the Postal Service will not be allowed to reproduce or program fobs; this could be very costly.

Please contact my office at 202-842-4240 with any questions. Your prompt response is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "M. Foster". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

for: Michael O. Foster, Director  
Motor Vehicle Service Division



February 12, 2020

Mr. Michael Foster  
Director  
Motor Vehicle Service Division  
American Postal Workers Union, AFL-CIO  
1300 L Street, NW  
Washington, DC 20005-4128

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Re: First Article Testing Mercedes Metris Van

Dear Mike:

This letter is in response to the APWU's January 28 letter noting observations regarding the First Article Testing of the Mercedes Metris Van in North Charleston, SC which occurred on January 15 and 16. The APWU presented eight (8) concerns regarding this van. The Postal Service has restated the APWU's concerns below, followed by the response.

1. The main issue of concern for the testers was the visibility. The vehicle was equipped with only the standard mirrors that come on any passenger vehicle.
  - A. There were no pot lid mirrors attached to this vehicle.

**Response: The Metris conforms to Federal Motor Vehicle Safety Standards, pot lid mirrors are not an option available from the manufacturer, however the Postal Service will pursue the option of audible sensors for the front of the vehicle.**

- B. The rearview mirror served no purpose at all. A plate attached to the cage was blocking the view.

**Response: The plate which is attached to the interior cage is being lowered so as not to obstruct vision.**

- C. There were discussions of installing/ mounting a camera on the rear of the vehicle to act as a rearview mirror.

**Response: The Postal Service will explore options for a rear view camera using the existing mirror as a monitor.**

- D. There was also no visibility of the front of the vehicle at the curb. Mailboxes and other objects are not visible. The vehicle has no assistive device(s) to enable viewing, or being made aware of, items at the curb. Sensors mounted to the vehicle could alert the driver of close objects.

**Response: The Postal Service will look into front bumper sensors with audible notification.**

2. The rear cargo area was poorly lit, there was not enough light to distinguish items.

**Response: After further review, it is determined the existing cargo light is sufficient.**

3. Shelving in the rear cargo area is too short. There is room for lengthening the shelving.

**Response: Interior shelving configuration has been reviewed and determined to be sufficient.**

4. The driver door opening was too high from the ground to access mailboxes.

**Response: After further review, it is determined the driver door opening is sufficient for mail delivery. The deployed vehicles do have four levers to adjust the driver's chair which would allow the Letter Carrier to adjust his position. One lever for height adjustment, for forward/backward motion, to adjust the seat back and to tilt the seat cushion. The prototype vehicle reviewed did not have this four (4) way driver chair adjustability.**

5. The mail tray bracket is very weak, the tray is too low.

**Response: The mail tray configuration is being reviewed for possible alternatives.**

6. Sliding door rollers and brackets are also very weak.

**Response: The sliding door components are not configurable by the manufacturer. Additionally, there is insufficient data to support the unacceptable quality of the components.**

7. Recommendation that a jump seat be installed for training purposes.  
**Response: The contractor is looking into an option for removing the tray and mounting a jump seat.**
8. The vehicle was equipped with key fobs. We were told that the Postal Service will not be allowed to reproduce or program fobs; this could be very costly.

**Response: The contractor's security risk prohibits the ability of the Postal Service to program key Fobs.**

If there are any questions, please contact Robert Ocasio at extension 2057.

Sincerely,



Rickey R. Dean  
Manager  
Contract Administration (APWU)