

**Memorandum of Understanding  
Between the  
United States Postal Service  
and the  
American Postal Workers Union, AFL-CIO**

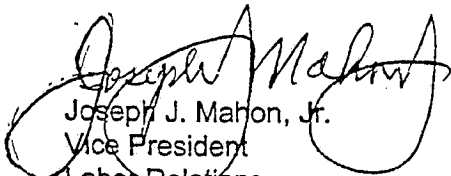
As a result of discussions between the parties in the recent "Summit" meetings, the parties are committed to eliminating the current grievance/arbitration backlog; preventing future re-occurrences through improvement of the labor-management relationship and addressing root causes that generate grievances. To this end, the parties have agreed to three initiatives:


1. Co-Mediation: Two Performance Clusters per Area will be selected as sites for implementation of the new mediation process described in Article 15.3.
2. FMCS Mediation: Two Performance Clusters will be selected as sites for use of the mediation services of the Federal Mediation and Conciliation Service.
3. Accelerated Arbitration: Two Performance Clusters per Area with the largest docket of cases pending arbitration will be selected. Sufficient numbers of arbitrators, advocates and arbitration dates will be assigned to complete hearings of all pending cases at specific locations on a first in first out basis, in a compressed mutually agreed to time frame. The National Summit Committee will insure that a sufficient number of arbitrators are made available to the parties, if necessary. After elimination of the current backlog, the arbitration docket will be monitored. Should the docket reach a mutually agreed threshold, the parties will again provide sufficient number of arbitrators and hearing dates to complete hearings in a compressed mutually agreed to time frame.

The parties will collect data, study and monitor these processes and evaluate the outcomes on a quarterly basis at the national level with the intent of finding ways to resolve labor-management disputes at the lowest possible step.

The Area Human Resources Managers/Labor Relations Specialists and Regional APWU Coordinators will submit their joint implementation plans for accelerated arbitration by May 30, 1997 to the National Summit Committee.

It is further understood that these initiatives will expire with the 1994-1998 National Agreement unless the parties otherwise agree.

  
Joseph J. Mahon, Jr.  
Vice President  
Labor Relations

  
William Burrus  
Executive Vice President  
American Postal Workers Union,  
AFL-CIO

Date: 5/8/97

Area Accelerated Arbitration Plans  
June 11, 1997

Area	Review Process Completed	Begin Date for Arbitration	Additional Arbitrators?	Dates per month per arbitrator	Cases per Date	Threshold Number of Grievances
Allegheny	August 30	September 1	4 additional arbitrators for each site.	9	5	1400 in Philadelphia, 500 in Pittsburgh
Mid-Atlantic	July 30	September 1	4 additional arbitrators for each site.	9	5	200 in PC
Northeast	November 30	November 30	Additional arbitrators only if needed. Will seek dates from current arbitrators first.	Unspecified	Unspecified	100 in Boston, 250 in Connecticut
Pacific	September 3	September 8	Will be decided within next 90 days.	Unspecified	2 (Regular) 7 (Accelerated)	Will be determined during review.
Southeast	October 1	October 1	Additional arbitrators if needed.	3	6	50 in large offices, 100 in rest of PC
Southwest	October 1	October 1	Additional arbitrators if needed.	3	6	50 in large offices, 100 in rest of PC
Western	July 31	September 1	10 additional arbitrators.	5	6	250 in District
Capital Metro	July 30	September 1	4 additional arbitrators.	9	5	100 in PC
Great Lakes	No agreement reached.					
Midwest	No agreement reached.					
New York Metro	No agreement reached.					

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LABOR RELATIONS




This is to inform you that you have been selected as an arbitrator to participate in a new initiative between the Postal Service and the APWU. We have agreed that, in certain offices, we will conduct an intensified, accelerated arbitration process and we request that you adjust your schedule accordingly for availability to serve on our panel.


While serving as an arbitrator in this effort, the schedule for your services will include:

1. On dates that you have agreed to hear cases, you may be expected to hear multiple cases per day. Your services shall be needed from the hours of 10:AM to 5:PM on each hearing date and you are requested to insist that cases be presented for each full hearing date.
2. Your presence at the assigned location should be for consecutive days consistent with your contracted dates.
3. Upon your arrival, the parties will provide you with a joint scheduling letter showing the sequence of hearing the pending cases. This scheduling letter will represent a commitment by the parties to hear unresolved cases in the order listed.
4. The Regional/Area representative or their designees will provide you with a copy of their signed agreement on the accelerated arbitration procedure and hearings are to proceed accordingly.
5. Your written decisions on completed cases shall be expected no later than 90 days from your final assignment each calendar month. The success of this effort is dependent upon the hearing of all pending disputes and timely decisions.

The American Postal Workers Union and the U.S. Postal Service have jointly committed to resolving disputes in a timely manner. We are excited about the possibilities of this effort in assisting us in reaching this goal. Your services as an arbitrator are an important link and we request your full cooperation.

  
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Pete Bazylewicz  
Manager, Grievance and  
Arbitration  
U.S. Postal Service

Dated: 6/11/97

  
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William Burrus  
Executive Vice President  
American Postal Workers  
Union, AFL-CIO

Dated: 6/11/97