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JOINT LABOR-
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FOR MUNICIPAL
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JOHN W. HANSON
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May 29, 2024

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RE: JLM-23-10181 – Worcester Police Superiors Local 504 NAGE/IBPO and City of Worcester

This letter is to advise the parties in the above-referenced case that at its meeting on April 25, 2024, the Joint Labor-Management Committee (JLMC) voted to conduct a hearing, pursuant to Section 1, sub-section (3)(a) of Chapter 589 of the Acts of 1987.

The hearing will seek to identify:

1. The issues that remain in dispute.
2. The current positions of the parties.
3. The views of the parties as to how the continuing dispute should be resolved.
4. The preference of the parties as to the mechanism to be followed in order to reach a final agreement between the parties.

The hearing will take place on June 13, 2024, at 1:30 PM and will be held at Worcester City Hall 455 Main Street Worcester, MA 01608.

The 3(a) panel will be chaired by John W. Hanson and will include a management representative and a fire representative and or senior staff representatives.

The Panel may conduct a mediation session prior to the hearing. The parties are urged to prepare accordingly.

Each party is to be represented by an authorized agent. In addition, the parties are instructed to bring individuals with settlement authority to the 3(a) hearing.

Furthermore, the Committee instructs the parties to comply with the following procedure requiring the exchange and submission of issues before the 3(a) hearing:

3(a) Hearing Practice and Procedure

Each party shall file a Prehearing Memorandum by email no less than **seven (7) business** days prior to the date of the scheduled 3(a) hearing. The Prehearing Memorandum shall be filed by email to efile.dlr@massmail.state.ma.us and copied to the Chairman of the Committee, the assigned Committee members for both Labor and Management, the assigned senior staff for both Labor and Management, and the counsel or representative of record for the other party. **Any response or objection** to another party's Prehearing Memorandum shall be filed in the manner described above no less than **three (3) business** days prior to the date of the scheduled 3(a) hearing and shall state with particularity the grounds upon which it is based, and the relief requested.

The Prehearing Memorandum shall contain the following information:

- The issues that remain in dispute and which each party wishes the 3(a) Panel to identify for arbitration. (Each party may present its position on Wages, Duration and up to five (5) additional, separate, and distinct issues. The issues should be **narrowly and precisely defined.**)
- The current positions of the party.
- The views of the party as to how the continuing dispute should be resolved.
- The preference of the party as to the mechanism to be followed to reach a final agreement between the parties.

Other relevant guidance:

Issues not presented in negotiations prior to the deadline for submitting issues agreed to by the parties in their negotiation ground rules, will not be allowed.

Unless otherwise agreed to by the parties, only issues certified by the Investigator(s) will be identified for arbitration by the 3(a) Panel. Certification of an issue by the Investigator(s), however, does not bind the 3(a) Panel to identify that issue for arbitration.

Mediation is an off the record process to encourage discussion and open dialogue. Any discussion, offers, or counteroffers made in mediation are off the record. Unless otherwise agreed to by the parties, issues raised by the parties for the first time in mediation will not be identified for arbitration by the 3(a) Panel.

Unless otherwise agreed to by the parties, a party will not be allowed to substitute new issues on the day of the 3(a) hearing that have not already been presented in the party's Prehearing Memorandum.

Chapter 589 of the Acts of 1987 does not provide for an appeal of decisions made by a 3(a) Panel.

We strongly encourage the parties to continue negotiating and attempting to resolve this matter on their own throughout this process.

Please feel free to contact the senior staff representative assigned to your case if you have any questions.

Thank you for your cooperation.

Yours truly,

A handwritten signature in blue ink, appearing to read "John Hanson", with a stylized flourish extending to the right.

John Hanson, Chairman

Cc: John Hanson
Alan Andrews
Dean Mazzearella
Robert Markel