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Subject: Seniority Integration Process

The time period for reaching a Seniority Integration Protocol Agreement that had been extended by agreement of the parties has now expired. Under Section 10.a. of the MOU, the next deadline we are facing will come on March 9. Unless direct negotiations have resulted in a merged seniority list by that date, we are obligated to select a panel of three neutral arbitrators within fifteen days.

We propose that, in the event that no integrated seniority list has been agreed to by the March 9 deadline, each of the three parties submit a list of names of three proposed arbitrators to serve on the panel of neutrals. If any arbitrators' names appear on all three lists, that person or those persons shall be on the panel. For those names that appear on one or more, but not all three, lists, the parties shall strike among them to determine which shall serve on the panel. The strike order shall be determined by coin toss.

Please let me know if this is acceptable. Thanks.

Paul

Sent from my iPad

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