



COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF LABOR RELATIONS  
PETITION FOR MEDIATION AND FACT-FINDING  
IN PUBLIC EMPLOYMENT OR VOLUNTARY  
INTEREST MEDIATION

DO NOT WRITE IN THIS SPACE

Case No.

Date Filed

PS-17-5987

5/16/17

The petitioner hereby requests that the DLR proceed under the applicable provisions of M.G.L. c.150E, Section 9, M.G.L.c.150, Section 6 and 456 CMR 21.00.

1. Employer's Name School Committee of the City of Boston		2. Telephone Number 617-635-9014
3. Employer's Address (street and no., city/town, state, and zip code) 2300 Washington Street, Roxbury, MA 02119		4. Fax Number
5. Employer's Labor Relations Representative David Murphy, Esquire	6. Email Address dmurphy6@bostonpublicschools.org	7. Telephone Number 617-635-9325
8. Employer's Representative's Address (street and no., city/town, state, and zip code) Office of Labor Relations, 2300 Washington Street, Roxbury, MA 02119		9. Fax Number 617-635-9059
10. Labor Organization's Name Boston Teachers Union Local 66, AFT Massachusetts		11. Telephone Number 781-359-9777
12. Labor Organization's Address (street and no., city/town, state, and zip code) 180 Mount Vernon Street, Dorchester, MA 02125		13. Fax Number 781-272-8692
14. Labor Organization's Representative's Name Matthew E. Dwyer, Esquire	15. Email Address mdwyer@ddlaborlaw.com	16. Telephone Number 781-359-9777
17. Labor Organization's Representative's Address (street, city/town, state, and zip code) Dwyer and Duddy, 25 Burlington Mall Road, S. 411, Burlington, MA 01803		18. Fax Number 781-272-8692

19 This Petition is being filed: (check one)

Jointly ☐ (If checked, complete sections 26 through 31 and skip section 32)

Employer Only ☐ (if checked, complete sections 26 - 28 & 32, skip sections 26-28)

Labor Org. Only ☒ (if checked, complete sections 29 - 31 & 32, skip sections 26-28)

20. Description of Collective Bargaining Unit Involved: See Attachment "A"	21. Number of Employee in Unit: 6500+
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22. Brief Statement of Issue(s) Over Which Impasse Exists:  
See Attachment "B"

23. Contract Expiration Date: August 31, 2016	24. Date Negotiations Commenced: February 2, 2016	25. # Negotiation Sessions to Date 30+
26. Employer's Representative Name	27. Signature 	28. Date
29. Labor Organization's Rep.'s Name Matthew E. Dwyer, Esquire	30. Signature 	31. Date May 16, 2017

32. CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this Petition on the representative of the opposing party.

Method of Service ☐ In hand ☒ First Class Mail ☐ Other (specify): \_\_\_\_\_

Signature and Title of Person making Certification

Attorney

801 CMR 4.00

4.02: 456 Department of Labor Relations

(4) The filing fee for a petition for mediation and fact-finding pursuant to M.G.L. Chapter 150, s.6 and 456 CMR 21.03 or for a request for voluntary interest mediation pursuant to 456 CMR 21.04 is \$1,000; provided, however, that the fee shall be paid in equal shares by the party seeking application and the answering party; provided, further, that the Director of the Department of Labor Relations may, where appropriate, provide for the waiver of the filing fee for any particular controversy or classes of controversies.

DLR FORM\_PS1 Revised 12/14

## Attachment "A"

Unit 1	Teachers, Nurses and Other Academic Personnel	(5,000+ employees)
Unit 2	Paraprofessionals	(1,000+ employees)
Unit 3	Substitute Teachers	(500+ employees)
Unit 4	ABA	(75-100 employees)

## Attachment "B"

Impasse exists over the following issues:

1. Salaries, longevity, educational degree payments and related economic items for all affected employees and for targeted groups
2. Layoff/Recall language
3. Length of Educator Plans
4. Job security of excess teachers
5. Inclusion classroom language
6. Class Size
7. Educator supports and job placement of educator supports personnel
8. SEIMS time for elementary teachers
9. Nurses
10. Assessments
11. Pay equity across different school types, including substitutes at extended learning time schools
12. Class size overage payments and indexing thereof
13. Parking
14. Itinerant services: FTE's as well as redistribution formula/workload model
15. Substitute paraprofessionals (or substitute teachers) for paraprofessional absences
16. Restorative Justice practice and program
17. Compensation for COSE's deprived of clerical support

DWYER AND DUDDY  
ATTORNEYS AT LAW, P.C.  
25 BURLINGTON MALL ROAD, SUITE 411  
BURLINGTON, MASSACHUSETTS 01803



MATTHEW E. DWYER  
CHRISTINA C. DUDDY†  
JILLIAN M. GUILFOYLE  
†ALSO ADMITTED TO PRACTICE IN THE STATE OF MAINE

TEL 781-359-9777

FAX 781-272-8692

May 16, 2017

VIA ELECTRONIC MAIL ONLY

Edward Srednicki, Executive Secretary  
Department of Labor Relations  
Charles F. Hurley Building  
19 Staniford Street, 1<sup>st</sup> Floor  
Boston, MA 02114

RE: Boston Teachers Union and School Committee of the City of Boston  
Petition For Mediation And Fact-finding In Public Employment

Dear Mr. Srednicki:

Enclosed herewith is a "Petition For Mediation And Fact-Finding In Public Employment" pursuant to Section 9 of General Laws c. 150E.

As you can see from the petition, the parties have been negotiating for a successor agreement for more than sixteen (16) months, without success, and have held in excess of thirty (30) bargaining sessions during that time. The existence of an impasse on so many issues, the considerable efforts made to date to achieve a successor agreement over the extended duration of negotiations and the number of affected employees all militate in favor of the prompt investigation of this impasse in accordance with G.L. c. 150E §9 and the convening of a mediation at the earliest possible date.

Accordingly, I urge the DLR to assign someone to investigate this matter promptly and have that individual notify the parties of the date established for said investigation.

Sincerely,

Matthew E. Dwyer

cc: Richard Stutman, President  
David Murphy, Labor Counsel

MED/kmg

Enclosure

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