MEMORANDUM OF UNDERSTANDING
BETWEEN THE
UNITED STATES POSTAL SERVICE
AND THE
AMERICAN POSTAL WORKERS UNION, AFL-CIO

The American Postal Workers Union and the United States Postal Service are committed to maintain the effectiveness of the arbitration process by ensuring that representatives of both parties maintain appropriate contact and communications with postal arbitrators. Accordingly, the parties agree that:

1. The parties' (APWU and USPS) representatives shall have no unilateral contact or discussion with an arbitrator concerning any subject which is, may be, or has been, before them.

2. As a general rule, no substantive written information shall be unilaterally sent to an arbitrator. In the context of an arbitration case which is currently designated to be heard by a specific arbitrator, however, it is understood that motions or briefs may be filed unilaterally, provided that copies are simultaneously provided to the opposing party. It is permissible, however, for either party to request subpoenas from an arbitrator unilaterally.

3. Matters such as scheduling or cancelling hearing dates, and establishing hearing locations are decided jointly by the parties. Accordingly, neither party is entitled to modify such hearing arrangements unilaterally.

4. Arbitrators may not participate in any, seminar, training program, or similar program hosted by either party unless the parties mutually agree in advance that the arbitrator's participation is appropriate.

5. All arbitrators are to conduct themselves in accordance with the standards of professional responsibility set forth in the "Code of Professional Responsibility for Arbitrators of Labor-Management Disputes."

The parties further agree that the limitations relative to arbitrator contact listed above are in addition to those expressed in the parties' Conditions of Appointment for Arbitrators.

Anthony J. Vegliante
Manager
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Moe Biller
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_11/21/95_
Date