

June 26, 2018

Richard P. Gilardi, Esq.
GILARDI, OLIVER & LOMUPO, P.A.
233 Fourth Avenue, 10th Floor
Pittsburgh, PA 15222

Dear Mr. Gilardi:

This is in response to your letter dated May 31, 2018.

First, let me correct an error in your letter when discussing my letter of May 2, 2018. You stated that I wrote "that the sector Agreement does not provide a dispute resolution procedure." (Emphasis added.) In fact, my May 2, 2018 letter acknowledged that the "Sector Agreement.....does provide for a dispute resolution procedure." I assume that this was merely an error, but wanted to correct it.

More importantly, however, CWA needs to better understand who you represent. The 2011 "PPMWS Agreement" containing the dispute resolution procedure was entered into by the "Laws and Finance Committee of the PPMWS." It is unclear from your letter whether you, in fact, represent the "Laws and Finance Committee." The demand for arbitration names "PPMWS of the CWA" as the name of the party filing the demand and also names the "PPMWS" as the grievant.

In addition, the 2011 "PPMWS Agreement" names Laws and Finance Committee as the "executive committee on all matters pertaining to the PPMWS." It is not clear whether the Laws and Finance Committee has authorized the arbitration demand or whether the Laws and Finance Committee is the party seeking arbitration. The original demand for arbitration cites Executive Officer Wasser as the contact for the grievant. Did you file the demand for arbitration at his direction? If so, at whose direction did he ask you to file the demand for arbitration? If he did not direct you to file the demand, who did?

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Are any CWA funds being used to fund this demand for arbitration? If Laws and Finance has authorized and directed this demand, is Laws and Finance utilizing funds other than those belonging to CWA?

Please advise at your earliest convenience as to these matters.

Sincerely,



Patricia M. Shea
General Counsel

cc: Chris Shelton
Ameenah Salaam
George Kohl
Jody Calcmine