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May 20, 2016

*Via Email: eric.yost@sedgwick.gov
and U.S. Mail*

Eric Yost
County Counselor
Sedgwick County Counselor's Office
525 N. Main, Suite 359
Wichita, KS 67203

*Via Email: Michael.North@sedgwick.gov
and U.S. Mail*

Michael L. North
Assistant County Counsel
Sedgwick County Counselor's Office
525 N. Main, Suite 359
Wichita, KS 67203

Re: Impasse in Negotiations; Fact-Finding; IAFF Local No.2612 and Sedgwick
County Fire District No. 1; PERB Case No. 75-I-4-2016
Our File No. 2612.0002

Gentlemen:

Pursuant to Mike's request of earlier this week, I am enclosing in type-written form the counter-proposal which the Union gave to the Employer on May 11, 2016. As I have indicated to you, if the Fire District agrees to the attached proposal, we will have an agreement for a Collective Bargaining Agreement through the year 2018.

Also, at the May 11 hearing, there was a dispute as to the actual cost of the Union's pay increase. I cannot give you the exact amount of the cost of our proposal. However, I have attached the testimony of Mr. Ronald York from the Fact-Finding hearing. In line with the testimony of David Thompson, Mr. York estimates that the cost of fixing the pay steps and the pay matrix was a one-time cost of \$48,000.00.

Also, and most importantly, Mr. York determined that the cost of a 2½% pay increase for the entire Fire Department (not just the bargaining unit), was \$263,000.00. (Please see pages 162-165 of his testimony.) Thus, it is clear that the cost of the attached pay proposal for 2017 will be something less than \$263,000.00. We doubt that it would cost that much for 2018.

Since the Commissioners specifically requested that we provide this information, I request that you provide a copy of this letter, the attached written proposal, and the attached testimony of Mr. York to all of the Commissioners who sit as the members of the Board of Directors of the Fire District. I specifically request that you direct their attention to pages 161-165 of Mr. York's testimony.

Eric Yost
Michael L. North
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Also, next week we will provide you with case authority demonstrating that the Board's authority to unilaterally implement a contract is limited to one year.

As I have previously advised you, the Union continues to remain ready, willing and able to negotiate over these matters to try to reach agreement on their Collective Bargaining Agreement. In that regard, we look forward to receiving a formal written response to our proposal which is attached.

As always, please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve", with a stylized flourish extending from the end.

Steve A.J. Bukaty

SAJB/ds

Enclosure

cc: Dave Thompson, President (*Via Email: jraticrat@cox.net*)
IAFF Local 2612
Bo Whelchel (*Via Email: bhwhelchel@gmail.com*)
IAFF Local 2612

Proposal of Sedgwick County
Firefighters Local No. 2612

May 11, 2016

The Union offers to settle all remaining issues with regard to the outstanding Collective Bargaining Agreement on the following basis:

1. For 2016: Institute the Pay Plan Matrix which was in effect prior to the 2014-2015 Agreement, which would result in restitution of the 3% spread between steps. The pay matrix would remain unfrozen so that for the life of the Contract, firefighters would move through the pay matrix on the appropriate anniversary date.
2. For 2017: A 2% across-the-board wage increase in the pay matrix.
3. For 2018: A 2% across-the-board wage increase for the entire pay matrix.

Also, as part of this proposal, the Union would agree to leave the longevity system in place and would abandon for now its claim that firefighters should be placed at their appropriate place on the longevity scale based on their years of service.