



American Postal Workers Union, AFL-CIO

1300 L Street, NW, Washington, DC 20005

May 19, 2003

William Burrus
President
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By Facsimile and First Class Mail

President's Commission on the
United States Postal Service
1120 Vermont Avenue, N.W., Suite 971
Washington, D.C. 20005

RE: Statement Concerning Testimony by Professor Michael
Wachter

National Executive Board
William Burrus
President

Cliff "C.J." Guffey
Executive Vice President

Robert L. Tunstall
Secretary-Treasurer

Greg Bell
Industrial Relations Director

James "Jim" McCarthy
Director, Clerk Division

Steven G. "Steve" Raymer
Director, Maintenance Division

Robert C. "Bob" Pritchard
Director, MVS Division

Dear Commissioners:

In its April 29, 2003, hearings on workforce issues, the Commission solicited and received oral testimony from Professor Michael Wachter, who is one of a substantial number of advocates employed by the parties to present their positions in collective bargaining and interest arbitration. We respectfully submit that the Commission erred in requesting such testimony. Professor Wachter is the most ardent and extreme of the advocates employed by Postal Service in its presentations in interest arbitration.

It is appropriate, perhaps necessary, for the Commission to be aware of the status of collective bargaining and aware of the major issues that divide the parties in collective bargaining. To this end it is reasonable for the Commission to receive and consider papers outlining the issues and the positions of the parties. Becoming informed about the nature of the issues is, however, far different from attempting to form judgments about the merits of the parties' positions on those issues. Given the short time available to the Commission for consideration of all the major issues affecting the Postal Service, it would be impossible for the Commission to form a valid opinion on the merits of the parties' collective bargaining disputes, and it would be a mistake for the Commission to try.

As Neutral Interest Arbitrator Stephen Goldberg stated, in his January 11, 2002, opinion, "[t]he evidence relating to private sector comparability is both voluminous and contradictory." Opinion at 7.

Regional Coordinators

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Northeast Region


Terry R. Stapleton
Southern Region

Omar G. Gonzalez
Western Region

Postal interest arbitrators normally hold more days of hearings on the issue of comparability than this Commission will hold on all the issues before it combined. The Commission has not heard very much about Professor Wachter's calculations; it has heard nothing from the many other witnesses whose testimony would have to be considered if this Commission were to try to form an opinion on the issue of comparability. None of the neutral interest arbitrators in APWU and Postal Service arbitrations who have considered comparability has accepted Professor Wachter's human capital approach to compensation comparability. We respectfully submit that, in the absence of a full record and ample time to consider it, the Commission should not presume to pass judgment on these issues.

Thank you for your attention to this important matter.

Sincerely,


William Burrus
President