



PETITION FOR ACT 312 ARBITRATION
EMPLOYMENT RELATIONS COMMISSION
Michigan Department of Labor and Economic Opportunity

Mayor and Council,

As expected, the City's Full-Time Fire Union (IAFF) has filed for 312 Arbitration. Please see their filing below. The City's Labor Counsel will attend the Executive Session on February 27th to walk Council through the process.

- Victor

MEDIATION CASE NO:				MEDIATOR:			
1. PUBLIC EMPLOYER NAME City of Novi				EMPLOYER Shifman Howard L Brandon			
ADDRESS (STREET NO. & NAME) 45175 Ten Mile Road				ADDRESS (STREET NO. & NAME) 31600			
CITY Novi		STATE MI		ZIP CODE 48375		CITY Bingham	
TELEPHONE WITH AREA CODE		FAX NO.		E-MAIL		TELEPHONE 248-597-3700	
2. LABOR ORGANIZATION NAME Novi Professional Fire Fighters Union, Local 3232, IAFF				LABOR CONTACT/REPRESENTATIVE NAME: Michael L. O'Hearon, PLC Michael L. O'Hearon Michael D. McFerren			
ADDRESS (STREET NO. & NAME) 40800 Five Mile Road - Suite B				ADDRESS (STREET NO. & NAME) same			
CITY Plymouth		STATE MI		ZIP CODE 48170		CITY	
TELEPHONE WITH AREA CODE 734-437-3073		FAX NO. 734-437-9216		E-MAIL mlohearon@hotmail.com		TELEPHONE WITH AREA CODE same	
						FAX NO. same	
						E-MAIL same	
PURSUANT TO RULE 423.505: THE FOLLOWING DOCUMENTS MUST BE ATTACHED TO THIS PETITION: ☐ A COPY OF THE MOST RECENT LABOR AGREEMENT BETWEEN THE PARTIES ☐ THE ISSUES HAVE BEEN IDENTIFIED AS EITHER ECONOMIC OR NON-ECONOMIC ☐ A COPY OF THE ISSUES IN DISPUTE							
THIS PETITION IS FILED BY: ☐ EMPLOYER ☒ UNION							
DATE MEDIATION REQUESTED: July 12, 2022 and August 25, 2022							
DATES AND TIMES OF MEDIATION MEETINGS:							
UNIT DESCRIPTION: All full-time employees of the Employer's fire department, excluding the fire chief, assistant fire chief, director of public safety, director of emergency services and fire operations, and civilian employees.							
NO. OF EMPLOYEES IN UNIT: 26				CONTRACT EXPIRATION DATE: June 30, 2022			

THE PETITIONER HAS ENGAGED IN GOOD FAITH BARGAINING AND MEDIATION, AND THE PARTIES HAVE NOT SUCCEEDED IN RESOLVING THE DISPUTED MATTERS.

I HAVE READ THE ABOVE PETITION AND THE STATEMENTS THEREIN ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Michael L. O'Hearon / Attorney

PRINT NAME/TITLE

February 14, 2023

DATE

SIGNATURE

SERVE ORIGINAL PETITION ON THE OTHER PARTY OR ITS REPRESENTATIVE AND FILE THREE COPIES AND A PROOF OF SERVICE WITH THE COMMISSION. ALSO ATTACH A COPY OF THE DOCUMENTS DESCRIBED ABOVE.

The Department of Labor and Economic Opportunity will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, handicap or political beliefs.

OFFICE USE ONLY: Date Petition Received: Date Panel Issued: Date of Last Best Offer: Date of Hearing: Date of Final Award:

**STATE OF MICHIGAN
EMPLOYMENT RELATIONS COMMISSION
STATUTORY ARBITRATION PURSUANT TO PA 312 OF 1969 (as amended)**

**NOVI PROFESSIONAL FIRE FIGHTERS
UNION, LOCAL 3232, I.A.F.F.,**

Petitioner,

and

Case No. 22-F-1278-CB

CITY OF NOVI,

Respondent.

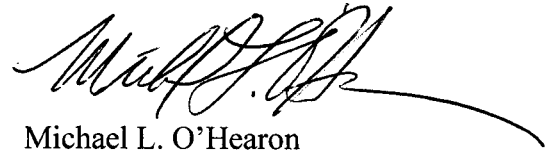
PETITIONER'S LIST OF ISSUES IN DISPUTE

1. Wages - Increase (Each year pled as a separate issue.) (Economic)
2. Wages – Pay adjustments (Each year pled as a separate issue.) (Economic)
3. Wages – Retroactivity for current employees (Economic)
4. Wages – Retroactivity for former employees (Economic)
5. Promotions – Promotional probation (Economic)
6. Promotions – Pay rate upon promotion (Economic)
7. Hours of Work – Captains and Lieutenants (Economic)
8. Hours of Work – Rest/Sleep time for Captains and Lieutenants
9. Acting Shift Supervisor – Qualifications (Economic)
10. Overtime – Provide option for compensatory time (Economic)
11. Overtime – Compensatory time maximum accrual (Economic)
12. Overtime – Compensatory time payout (Economic)
13. Auxiliary Firefighters – Chain of command (Non-economic)
14. “All-Call” – Eligibility (Economic)
15. Training – Eligibility (Economic)
16. Combined Time Off – Increase (Economic)
17. Defined Contribution Retirement Plan – Employer contribution (Economic)
18. Defined Contribution Retirement Plan – Employee contribution (Economic)

19. Retiree Healthcare – Terms and duration of obligation (Economic)
20. Classification Designations – Modify (Non-economic)

Respectfully submitted this 14th day of February 2023

MICHAEL L. O'HEARON, PLC

A handwritten signature in black ink, appearing to read "Michael L. O'Hearon", with a long, sweeping horizontal line extending to the right.

Michael L. O'Hearon