
Position Paper

DATE: August 15, 2008

SUBJECT: Methodology for Selection of Comps - Size

In attempting to select comparators consistent with the intent of the statute, employers and unions have historically focused on the customary, self-evident measurement of a jurisdiction's size; namely, population.

Police and fire interest arbitration awards since 1980 reflect the trend of arbitrators to apply a criterion of 50% (+-) the target jurisdiction.

Date	Arbitrator	Parties	Minimum Population	Maximum Population
05/27/97	Axon	Everett v. EPOA	-31%	+31%
07/30/96	Axon	Sno Co v. Teamsters	-50%	+50%
06/20/96	Abernathy	Camas v. IAFF	-50%	+50%
02/06/92	Axon	Pullman v. PPOG	-10%	+86%
06/17/91	*Beck	Bellingham v. IAFF	-28%	+90%
02/12/90	Krebs	Pasco v. PPOG	-30%	+30%
10/04/90	Levak	Pasco v. IAFF	-50%	+50%
06/17/91	Beck	Moses Lake v. IAFF	-38%	+60%
04/02/96	Latsch	Bellingham v. Teamsters	-50%	+50%
09/17/97	Lumbley	Centralia v. IAFF	-9%	+46%
07/01/97	Beck	Vancouver v. VPOG	-40%	+48%
07/01/80	Abernathy	Lynnwood v. Teamsters	-20%	+20%
06/01/87	Beck	Cowlitz Cnty v. Teamsters	-33%	+33%
08/01/83	Beck	Seattle v. Police Mgmt.	-27%	+45%
06-01-90	Beck	Clark #6 v. IAFF	-33%	+44%
06-01-91	Beck	Moses Lake v. IAFF	-38%	+60%
05-25-93	Axon	Mount Vernon v. Police Guild	-19%	+28%
06-05-97	Gaunt	Pullman v. Police Guild	-49%	+98%
05-21-97	Lumbley	Centralia v. IAFF	-9%	+46%
01-01-97	Krebs	Kennewick v. IAFF	-53%	+51%
07-01-98	Abernathy	Milton v. Police	-50%	+50%
05-01-98	Axon	Bremerton v. Police Guild	-47%	+9%

* In the Bellingham decision, both the union and the city had agreed to -50%, +100% and Beck awarded -28%, +90%.

Arbitrator Beck, in Seattle v. Seattle Police Management Association (Beck, 1983) concluded that Seattle, a City 80% larger than Sacramento is not similar in size. He also concluded that, "...to include such cities as San Diego that have a population of 75% or more than that of Seattle would, in the opinion of your Chairman, not be in accord with the statutory mandate to compare cities of similar size." (pp. 12)

In City of Bellingham v. IAFF Local 9 1 06 (Beck, 1991) at

pp. 6-7 and (Beck, 1994) at p. 6., when the comparables were finally selected, Arbitrator Beck selected the closest five up and five down in population, and the resulting range was much narrower. In that case, Bellingham's population was listed as 47,290.

The largest population selected by Arbitrator Beck was Clark County at 80,000 (+69%) and the smallest population selected was Kennewick at 36,880 (-22%). See p. 22 (Beck, 1991). Finally, a +/-30% population band was agreed upon in King, 16 v. IAFF Local 42459 (Beck, 1988).

Based upon the above data it would appear that the use of a methodology using 50%+, 50%- is appropriate and in keeping with virtually all recent arbitration decisions.