

November 4, 2009

Elizabeth Daugherty, Chair  
Harry Hoaglander, Member  
Linda Puchala, Member  
National Mediation Board  
1301 I Street N. W.  
Suite 250 East  
Washington, D.C. 20005-7011

**Re: Proposed NMB Rule Change For Union Representation Elections -  
Docket No. C-6964**

Dear NMB Members:

I write to register my strong support for a change in the National Mediation Board's ("NMB") policy to allow a majority of workers who cast ballots to determine the outcome of union representation elections in the airline and railroad industries as is the case in all other industries. The NMB is alone among governmental agencies in requiring of an airline or railroad in order to win union representation. Thus, under the current rule, if fewer than fifty percent of the workforce participates in the election, non-voters are counted as "no votes" and union representation is lost regardless of the number of employees who actually voted in favor of the union. Thus, airline and railroad management are rewarded for suppressing their own employees' participation in an NMB-sponsored election. This is unfair and stands in contrast to the rules applied in our democratic system in America's general elections where a majority of votes cast determine the outcome regardless of the number of voters that participated in the election.

The NMB's policy first applied in 1934, more than seven decades ago, which may have been born of concerns concerning communications with employees in distant locations, is no longer valid in the modern era. With today's multiple means of electronic and telephonic communications, and the NMB's own electronic voting system, a "super majority" vote is no longer necessary to insure broad participation and the Board's policy should be updated to become more democratic in meeting the needs and realities of the 21st Century.

Respectfully,

*Susan Gablowski*  
CSA - NORTHWEST / DELTA