



BEFORE THE NATIONAL MEDIATION BOARD

Representation Election Procedure

Docket No. C-6964

COMMENTS OF THE TRANSPORTATION TRADES DEPARTMENT, AFL-CIO

On behalf of the Transportation Trades Department, AFL-CIO (TTD) and our 32 affiliated unions¹, we want to express our support for the National Mediation Board's (NMB or the Board) proposed revisions in 29 CFR Parts 1202 and 1206 to reflect contemplated changes in the Board's representation election procedure. 74 Fed. Reg. 56750, 56754 (Nov. 3, 2009).

Specifically, the Board proposes that in secret ballot representation elections conducted by the NMB, the choice of collective bargaining representation will be determined by the majority of valid ballots cast by the eligible employee voters. 74 Fed. Reg. at 56750, 56751-2, 56754. Instead of presuming that all employees who fail to cast a ballot oppose representation, the Board will now allow all eligible voters a fair and equal opportunity to cast a deliberate vote that registers their own choice for ("yes") or against ("no") collective bargaining representation. 74 Fed. Reg. at 56751-2. As the notice explains:

¹ TTD is the transportation umbrella organization of the AFL-CIO and our member unions represent thousands of workers covered under the RLA. Attached at 1 is a complete list of TTD's affiliated unions.

Transportation Trades Department, AFL-CIO

888 16th Street, NW • Suite 650 • Washington, DC 20006 • tel: 202.628.9262 • fax: 202.628.0391 • www.ttd.org
Edward Wytkind, President • Patricia Friend, Secretary-Treasurer

