

From: Rebecca Smith

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Subject: Docket No. C-7198

To: legal@nmb.gov <legal@nmb.gov>

I would like to comment on the

“The National Mediation Board (NMB or Board) is proposing to amend its regulations to provide a straightforward procedure for the decertification of representatives. The Board believes this change is necessary to fulfill the statutory mission of the Railway Labor Act, protecting employees’ right to select their representative. This change will ensure that each employee has a say in their representative and eliminate unnecessary hurdles for employees who no longer wish to be represented.”

I assisted pilots in their struggles to understand a system that makes it impossible to decertify or reject representation that it in place. Under the NLRB, it is quite straightforward and there is no confusion on the question or the intent of filing a decertification. Under the NMB I have had to create videos walking thru the process step by step and no matter how well I explain it to those who ask, on voting day there is still confusion over the “straw man”. This confusion leads to people voting for the “strawman” because they believe it reflects their choice to not be represented.

By making the process strait forward it also clarifies for those who want to be represented where to cast their vote since the current ballot gives them what appears to be several choices for representation.

The fact that you have to add a “strawman” to a ballot when the question is simply do I want to be represented or not defies common sence or the definition of a simple understandable process. Most people in the airline industry just assume the convoluted process is more of an attempt to keep them from breaking ties with a union than giving them the ability to choose.

I would like to thank the NMB for stepping forward with a plan to simplify a process and for being concerned foremost with protecting an employees right to choose thru this amendment.

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