

From: 'Steve Stoecker' via Legal <legal@nmb.gov>

Date: Mon, Apr 1, 2019 at 2:30 AM

Subject: Docket No. C-7198

To: <legal@nmb.gov>

I am currently a flight attendant with Allegiant Air. Beginning in 2014 and ending in 2016, I spearheaded the effort by Allegiant flight attendants to decertify our union (NMB Case No. R-7438). I was also the straw man, so my name was front and center in everything that went on during that 15 month period. I was tasked with convincing half of my work group, approximately 815 flight attendants at the time, to sign an authorization card that stated that I wanted to represent them, even though I didn't want to. Trying to explain to the rest of the work group that in order to decertify and become unrepresented, they have to sign a card authorizing me to represent them was confusing to say the least.

Once the required showing of interest was satisfied and an election was granted, then my focus shifted to educating hundreds of flight attendants on how to vote. I had a short window of time to campaign and remind my colleagues to not vote for me but rather to vote "no representation." It was a lot of work that took a lot of time and explaining. At the time, I thought about how convoluted the entire decertification process was under the Railway Labor Act.

The straw man also has a target on his back since his name is on all the authorization cards and on every election ballot. Transport Worker's Union, the union that my colleagues and I attempted to decertify, spread lots of lies about me and said lots of nasty things about me. Elimination of the straw man will be beneficial from the standpoint that no one individual will have to bear the brunt of union attacks during a decertification effort.

Freedom of Association is a right guaranteed to us in the Bill of Rights. The Essentials of Human Rights describes this right as "coming together with other individuals to collectively express, promote, pursue and/or defend common interests."

It is no secret that current NMB rules are stacked in favor of union representation. If the union wins a decertification election, as was the case with the Allegiant flight attendants in 2016, there is a 2 year bar on elections for the employees. If the employees win the decertification election there is only a one year bar on elections for the union. The straw man requirement makes the decertification process extremely complex and difficult to navigate. Fair and equitable this is not. The NMB should not be in the business of discriminating against employees who collectively have come together to seek to be unrepresented. This is a clear breach of the Board's responsibility to uphold the right of Freedom of Association among employees.

The time to provide a straightforward procedure for the decertification of representatives is long overdue, and I commend the Board for recognizing this. If unions are provided a direct route to certification then employees need to also be provided a direct route to decertification. It is imperative that the Board finally place decertification on equal footing with certification. I encourage the Board to adopt these proposed amendments to its regulations as soon as is practicable.

Sincerely,

Steven Stoecker
Allegiant Air flight attendant
Bellingham, WA