

April 1, 2019

Mary Johnson
General Counsel
National Mediation Board
1301 K Street, NW
Ste. 250E
Washington, D.C. 20005

RE: MNB-2019-0001-0001

Dear Ms. Johnson:

The National Air Carrier Association (NACA) represents a diverse group of 17 airlines which includes ultra-low-cost carriers, charter airlines, and all-cargo carriers. We would like to take this opportunity to comment on the National Mediation Board (NMB) proposal to amend its regulations providing for a straightforward procedure for the decertification of representatives (NMC-2019-0001-0001).

The vast majority of United States airlines have labor representation for various groups of people they employ, such as unions representing pilots, mechanics, , and flight attendants. The National Railway Labor Act is well-established law that protects employees' rights to select their representatives for collective bargaining. The process for starting and formally enacting labor representation is both well documented and easily understood by employees in any sector that has the option to unionize.

However, the ability of employees in a union to leave or seek other representation has been historically difficult. There is no reason leaving a union should be far more difficult than joining such a union. This comes down to a fundamental issue of fairness for employees who should not be beholden to an organization that they have determined inadequately represents their interests. The process for decertifying should be as straightforward, fair, and legally protected as that to join a union.

We appreciate the NMB taking this action and fully support the proposal.

NACA Airlines: Air Transport International, Amerijet, Allegiant Air, Atlas Air, Everts Air Cargo, Frontier Airlines, Kalitta Air, Lynden Air Cargo, Miami Air International, Northern Air Cargo, Omni Air International, Spirit Airlines, Sun Country Airlines, Swift Air, USA Jet Airlines, Western Global Airlines, World Atlantic Airlines

Thank you for taking the time to consider our comments. Please do not hesitate to contact me if you have any additional questions.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "George Novak", written in a cursive style.

George Novak
President
National Air Carrier Association