



NATIONAL MEDIATION BOARD
WASHINGTON, DC 20572

(202) 692-5000

In the Matter of the
Application of the

THE ASSOCIATION OF FLIGHT
ATTENDANTS-CWA, AFL-CIO

alleging a representation dispute
pursuant to Section 2, Ninth, of
the Railway Labor Act, as
amended

involving employees of

NJI, INC./NETJETS AVIATION,
INC.

37 NMB No. 39

CASE NO. R-7225

FINDINGS UPON
INVESTIGATION

May 12, 2010

This determination addresses the application filed by the Association of Flight Attendants – CWA, AFL-CIO (AFA). The AFA seeks to represent the craft or class of Flight Attendants on NJI, Inc. (NJI). NetJets Inc. (NetJets or Carrier) requests the National Mediation Board (NMB or Board) to investigate whether NJI and NetJets Aviation, Inc. (NJA) are operating as a single transportation system. The Flight Attendants at NJI are currently unrepresented, and the Flight Attendants at NJA are currently represented by the International Brotherhood of Teamsters, Airline Division (IBT).

The investigation establishes that NJI and NJA do not constitute a single transportation system for purposes of the craft or class of Flight Attendants.

PROCEDURAL BACKGROUND

On November 5, 2009, the AFA filed an application alleging a representation dispute involving the Flight Attendants on NJI. The application was given NMB Case No. R-7225 and assigned to Investigator Cristina A. Bonaca. On November 20, 2009, the Carrier provided information raising system issues.

On November 30, 2009, the IBT notified the Investigator that it wished to be included as a participant in the NMB's investigation. Also on November 30, 2009, the Investigator requested the participants to comment on the system issue. The Investigator asked the Carrier to provide evidence in support of its position that NJI and NJA operate as a single transportation system. The Carrier and the AFA each requested an extension of time to file comments. The Investigator granted the request and the IBT, the AFA, and the Carrier each filed submissions on December 18, 2009.

On January 12, 2010, the case was reassigned to Investigator Susanna F. Parker. The IBT filed an additional submission on February 1, 2010. On March 1, 2010, the Investigator requested information regarding payroll services from the Carrier. The Investigator asked the participants to file any additional responses by March 8, 2010. The Carrier filed a reply on March 8, 2010. Neither the IBT nor the AFA filed additional information.

ISSUE

Are NJI and NJA operating as a single transportation system? If so, what are the representation consequences?

CONTENTIONS

AFA

The AFA contends that NJI and NJA do not constitute a single transportation system. The AFA argues that NJI and NJA operate under separate operating certificates, and have their own Chief Pilot, Chief Flight Attendant, scheduling department and travel department. Furthermore, the AFA asserts that NJI is held out as a separate company to the public and has its own website, <http://www.netjetsinternational.com>. The AFA contends that the Carrier, "the owner of NJI and NJA, has its own website as well. (NetJets.com). Thus, the parent company clearly views NJI as a separate carrier."

The AFA states that NJI's corporate headquarters are in Okatie, South Carolina and NJI does its own hiring, employee training, and maintenance of its aircraft. The AFA also states that NJI's flight attendants are currently unrepresented, their pay and benefits are dictated by NJI management, and they are qualified to fly only the Carrier's Gulfstream G4, G450, G5, and G550 aircraft.

In contrast, the AFA asserts that NJA's corporate headquarters are located in Columbus, Ohio and NJA does its own hiring, employee training, and maintenance of its aircraft. The AFA states that NJA's flight attendants are currently represented by the IBT and they are qualified to fly only the Carrier's Falcon and Boeing Business Jet aircraft.

According to the AFA:

NJA negotiated a Letter of Agreement (LOA) with the IBT that would have brought NJI flying under the NJA CBA concurrent with the final integration of the NJI/NJA pilot workforce. The LOA would have also provided for the interchange of flight attendants with NJI and the consolidation of the two workforces. Those provisions were voted down by the NJA flight attendants, and as a result, there is no agreed-upon plan between the IBT and NJA to integrate the NJI and NJA flight attendants.

Finally, the AFA contends that NJI and NJA do not constitute a single transportation system; therefore, the NMB should schedule an election for the NJI flight attendants without delay. The AFA provided a declaration from a flight attendant in support of its position.

IBT

In the IBT's initial statement, the IBT agrees with the AFA and states that NJI and NJA do not constitute a single transportation system for the flight attendant craft or class. The IBT states, "there is insufficient integration of operations, labor and personnel functions with respect to NJA and NJI flight attendants for a single transportation system to be found at this time." The IBT provided documents from the Carrier's website in support of its position.

In a subsequent submission, the IBT states, "Upon a review of the evidence submitted by the Carrier and upon its own investigation of that evidence, however, the IBT has confirmed that there has been a substantial integration of operations, financial control, and labor and personnel functions at NJA and NJI such that a single transportation system should be found to exist for the craft or class of flight attendants."

CARRIER

The Carrier states that NJI and NJA operate as a single transportation system. The Carrier explains that NetJets is owned by Berkshire Hathaway Inc., and NJI and NJA are subsidiaries of NetJets. According to the Carrier, NetJets “provides overall management of the enterprise.” The Carrier asserts that “the financial, legal, labor relations, human resources, aircraft acquisition and disposal, procurement, telecommunications, and owner services functions of NJI, Inc. and NJA are administered in an integrated fashion.” The Carrier states that NetJets is responsible for hiring and training flight crews, scheduling flights, and maintaining the aircraft. The Carrier argues that while NJI and NJA maintain “separate DOT operating certificates, NetJets’ North American Operations, including NJI, Inc. and NJA are the responsibility of President Bill Noe, formerly President of NJI, Inc.” The Carrier states that Bill Noe reports directly to David Sokol, the Chairman and sole Director of NJI, NJA, and NetJets.

The Carrier argues that “NJI and NJA are not ‘merging’ in the traditional FAA sense,” but contends that “NJA and NJI are far down the path to achieving full integration, which will occur on or before November 21, 2010. By that time, the NJI, Inc. and NJA pilots will be covered by the NJA collective bargaining agreement. The flight attendants at NJA have negotiated a provision in their collective bargaining agreement with NJA that will bring the NJI, Inc. flying under the NJA agreement concurrent with the final integration of the pilot workforce. NJA and IBT also negotiated a tentative agreement providing for the interchange of flight attendants with NJI, Inc., and the consolidation of the two workforces.” Although the tentative agreement failed to ratify, NetJets maintains that its failure was not related to its “provisions for integration and consolidation.”

The Carrier asserts that NJI and NJA are “virtually indistinguishable,” owners fly both NJI and NJA aircraft, the livery is similar, and “NJI, Inc. and NJA present itself to the general public under the ‘NetJets’ brand in advertising, signage and marketing.”

The Carrier provided declarations and other documentary evidence in support of its position.

FINDINGS OF LAW

Determination of the issues in this case is governed by the Railway Labor Act (RLA), as amended, 45 U.S.C. § 151, *et seq.* Accordingly, the Board finds as follows:

I.

NJI and NJA are common carriers as defined in 45 U.S.C. § 181, First.

II.

The AFA and the IBT are labor organizations as defined in 45 U.S.C. § 151, Sixth, and § 152, Ninth.

III.

45 U.S.C. § 152, Fourth, gives employees subject to its provisions “the right to organize and bargain collectively through representatives of their own choosing. The majority of any craft or class of employees shall have the right to determine who shall be the representative of the craft or class for purposes of this chapter.”

IV.

45 U.S.C. § 152, Ninth, provides that the Board has the duty to investigate representation disputes and to designate who may participate as eligible voters in the event an election is required. In determining the choice of the majority of employees, the Board is “authorized to take a secret ballot of the employees involved, or to utilize any other appropriate method of ascertaining the names of their duly designated and authorized representatives . . . by the employees without interference, influence, or coercion exercised by the carrier.”

STATEMENT OF FACTS

Background

NetJets is a fractional aircraft ownership company that allows individuals and corporations to purchase shares of a NetJets aircraft. NetJets is owned by Berkshire Hathaway Inc., and NJI and NJA are wholly-owned subsidiaries of NetJets. NetJets operates approximately 500 aircraft in the United States through NJI and NJA.

Corporate Transactions and Representation

NJI currently employs 157 flight attendants. The NJI flight attendants are currently unrepresented.

On July 12, 2001, the IBT was certified as the representative of the craft or class of Flight Attendants on Executive Jet Aviation, Inc. (R-6820).^{*} NJA currently employs 127 flight attendants.

NJI and NJA have separate Air Carrier Certificates issued by the FAA: NJI's Certificate Number is N93A610K, effective October 1, 2003; and NJA's Certificate Number is DXTA401D, effective December 1, 1978, reissued April 24, 2002.

Management and Labor Relations

NetJets provides the following combined services: Financial, Brent Smith, Senior Vice President, Chief Financial Officer; Legal, Jordan Hansell, Senior Vice President, General Counsel; Labor Relations, Michael Maratto, Vice President, Labor Relations; Human Resources, Linda Miller, Vice President, Global Human Resources; Sales, Marketing, and Global Asset Management, Ben Murray, Executive Vice President of Business Development; Procurement, Todd Deavers, Vice President, Purchasing; Information Technology, Ken Green, Interim Chief Information Officer; and Owner Services, Mary Flynn, Senior Vice President, to NJI and NJA through its wholly-owned subsidiaries NetJets Services, Inc. and NJ Executive Services, Inc. NetJets' North American Operations, including NJI and NJA, have one Chairman and sole Director, David Sokol. Bill Noe, formerly president of NJI, NetJets North America President and Chief Operating Officer, "provides strategic guidance . . . to . . . the two entities. This includes both policy decisions and day-to-day communications and involvement with respect to coordination of the two carriers' operations." Noe holds weekly meetings with the Presidents of NJI and NJA. Additionally, Noe "approves overall budgets and expense authorizations for both NJI and NJA with the involvement of Brent Smith, Senior Vice President, Chief Financial Officer of NetJets."

Michael P. Maratto, Vice President, Labor Relations, NJ Executive Services, testified that NetJets has plans to further integrate NJI and NJA. These plans include: "continued integration of organizational relationships and combined management; an Operational Excellence Initiative, which involves a review and harmonization of flight manuals for pilots and flight attendants, as well as overall centralization of personnel policies; and combined payroll services for NJI and NJA as of January 1, 2010." Maratto reports directly to Noe and is in charge of labor relations at both NJI and NJA. Linda Miller, NetJets Vice President, Global Human Resources, is responsible for the human

^{*} Executive Jet Aviation, Inc. is now NJA.

resources function of both NJI and NJA. As of November 21, 2010, NJI and NJA pilots will be covered under a single collective bargaining agreement.

NJI has its own website, <http://www.netjetsinternational.com>, that has a “Careers” section which directs interested applicants to email their resumes to njintlemployment@netjets.com or mail them to NJI, Inc., ATTN: RECRUITING, 108 Traders Cross Road, Suite 100, Okatie, SC 29909.

NJA’s website, <http://www.netjets.com>, states that although they are not currently hiring for flight attendant positions, interested applicants should submit a “profile” for future consideration. The website continues:

This is the best way to provide your qualifications to a NetJets recruiter. Using this feature, you can also sign up to receive email notification as new jobs that match your career interests become available. Before you begin, we recommend you have your cover letter, resume and any letters of recommendation available. You can officially apply for a job using your online profile at that time.

. . . .

If you need assistance with applying for a job online, please email recruiting@netjets.com or call 614-849-7566.

Public Relations and Marketing

NJI and NJA each have their own website, <http://www.netjetsinternational.com> and <http://www.netjets.com>. NJI’s website contains limited information and has a link to NJA’s website. NJA’s website is also the official “NetJets” website and contains significant information about NetJets. The only mention of NJA specifically is under a section entitled “NetJets Companies.”

Pursuant to the NJA collective bargaining agreement with the IBT, NJA flight attendants are prohibited from flying on NJI aircraft. Similarly, NJI flight attendants cannot fly on NJA aircraft. NJI flight attendants are qualified to fly on the Gulfstream G4, G450, G5 and G550 aircraft. NJA flight attendants are qualified to fly on the Falcon and Boeing Business Jet aircraft. According to Maratto, NJI and NJA flight attendants use common lockers and closets

maintained by NetJets and overnight together at Hilton family hotels.

The livery and aircraft numbers on NJI and NJA are similar. The first letter and the last two letters of the aircraft numbers on NJI and NJA aircraft are the same; only the numbers differ. The aircraft numbers on both NJI and NJA are: N###QS.

Owners book flights with NetJets through a single “owner services” function on the NetJets.com website and can request flights on either NJI or NJA. Owner Services is based solely in Columbus, Ohio and is headed by Senior Vice President Mary Flynn, who reports directly to Noe. According to Maratto, NetJets reviews travel requests and builds “a daily schedule that maximizes the number of ‘revenue’ flights (flights for owners) and minimizes the number of ‘ferry’ (or positioning) flights.” Maratto stated in his declaration: “Approximately one third of all NJI flights carry NJA owners and guests. Either NJA owners select NJI aircraft or vice versa. In addition, NetJets frequently upgrades owners to NJI aircraft for marketing purposes or to optimize efficient aircraft utilization throughout the network.”

NetJets marketing campaign focuses on the “NetJets” brand. In the 2009 “Only NetJets” marketing campaign, NetJets stated the following:

- As a NetJets Owner, you have at your disposal, your own, dedicated Owner Services Team.
- With aircraft accommodating 6-18 passengers and flight ranges of up to 7,700 statute miles, we offer a jet type to meet every need.
- With 800 aircraft, guaranteed availability and two type-rated captains on every flight, we set the standards for the industry.

In 2008, NetJets also marketed the “NetJets” brand.

Signs, Logos, and Uniforms

NJI and NJA flight attendants have distinct uniforms. According to Maratto, “[a] corporate initiative was established in 2009 to change the uniform, but the project was suspended due to cost concerns.” Additionally Maratto states that FAA regulations for maintaining separate Air Carrier Certificates require NJI and NJA flight crews to have “distinct employee badges or uniform markings displaying NJI or NJA as the ‘operating entity’ for FAA purposes. A standardized ‘NetJets’ logo also may be added in the future, but

the separate FAA certificates require NJI and NJA identifiers to remain visible to passengers and outsiders.”

According to Maratto, the NetJets logo is displayed “on the buildings and parking lots of the two NetJets owners’ lounges in Teterboro, New Jersey and White Plains, New York.”

Offices and Equipment

NJI’s corporate headquarters are located in Okatie, South Carolina and NJA’s corporate offices are located in Columbus, Ohio. Maratto stated in his declaration: “NJI and NJA, as non-hub and spoke operations, do not own a significant amount of ground equipment, but rather use equipment available at individual airport facilities.”

DISCUSSION

I.

The Board’s Authority

45 U.S.C. § 152, Ninth, authorizes the Board to investigate disputes arising among a carrier’s employees over representation and to certify the duly authorized representative of such employees. The Board has exclusive jurisdiction over representation questions under the RLA. *General Comm. of Adjustment v. M.K.T. R.R.*, 320 U.S. 323 (1943); *Switchmen’s Union of N. Am. v. Nat’l Mediation Bd.*, 320 U.S. 297 (1943). In *Air Line Pilots Ass’n, Int’l v. Texas Int’l Airlines*, 656 F.2d 16, 22 (2d Cir. 1981), the court stated, “the NMB is empowered to . . . decide representation disputes arising out of corporate restructurings.”

II.

Single Transportation System

The Board’s Representation Manual (Manual) Section 19.4 provides that: “Any organization or individual may file an application, supported by evidence of representation or a showing of interest . . . seeking a NMB determination that a single transportation system exists.” The instant application together with the information provided by the Carrier raise the issue of the scope of the Carrier’s system and whether a single transportation system exists. Manual Section 19.501 provides the factors for making a determination whether a single transportation system exists.

In *Trans World Airlines/Ozark Airlines*, the Board cited the following indicia of a single transportation system:

[W]hether a combined schedule is published; how the carrier advertises its services; whether reservation systems are combined; whether tickets are issued on one carrier's stock; if signs, logos and other publicly visible indicia have been changed to indicate only one carrier's existence; whether personnel with public contact were held out as employees of one carrier; and whether the process of repainting planes and other equipment, to eliminate indications of separate existence, has been progressed.

Other factors investigated by the Board seek to determine if the carriers have combined their operations from a managerial and labor relations perspective. Here the Board investigates whether labor relations and personnel functions are handled by one carrier; whether there are a common management, common corporate officers and interlocking Boards of Directors; whether there is a combined workforce; and whether separate identities are maintained for corporate and other purposes.

14 NMB 218, 236 (1987).

The Board finds a single transportation system only when there is substantial integration of operations, financial control, and labor and personnel functions. *Delta Air Lines, Inc./Northwest Airlines, Inc.*, 36 NMB 36 (2009); *Burlington N. Santa Fe Ry. Co.*, 32 NMB 163 (2005); *Huron & Eastern Ry. Co., Inc.*, 31 NMB 450 (2004); *Portland & Western R.R., Inc.*, 31 NMB 71 (2003). Further, the Board has noted that a substantial degree of overlapping ownership, senior management, and Boards of Directors is critical to finding a single transportation system. *Precision Valley Aviation, Inc., d/b/a Precision Airlines and Valley Flying Serv., Inc., d/b/a Northeast Express Reg'l Airlines*, 20 NMB 619 (1993).

NetJets is owned by Berkshire Hathaway, and NJI and NJA are wholly-owned subsidiaries of NetJets. NJI and NJA have one Chairman and sole Director. Although NJI and NJA are run by a common management team, NJI's corporate headquarters are located in Okatie, South Carolina and NJA's

corporate offices are located in Columbus, Ohio. Additionally, NJI and NJA have their own Chief Pilot and Chief Flight Attendant.

NJI and NJA fly under two separate operating certificates with separate flight crews. The fact that NJI and NJA hold separate certificates strongly supports the Board finding separate transportation systems. *See GoJet Airlines, LLC and Trans States Airlines, Inc.*, 33 NMB 24, 37-38 (2005); *Frontier Airlines*, 24 NMB 635, 643 (1997). Although NJI and NJA have announced an integration date of November 21, 2010 for completing consolidation, only the pilots will be covered under a single collective bargaining agreement. There is no plan in place for integration of the flight attendants.

Owners book flights with NetJets through a single “owner services” function on the NetJets.com website. Although service for owners can be fulfilled by either NJI or NJA, NJA flight attendants are prohibited from flying on NJI aircraft and NJI flight attendants cannot fly on NJA aircraft. NJI flight attendants are qualified to fly on the Gulfstream G4, G450, G5 and G550 aircraft. NJA flight attendants are qualified to fly on the Falcon and Boeing Business Jet aircraft.

NJI and NJA have their own websites and applicants for positions at either NJI or NJA must apply through the designated web address or mail address. Although the livery and aircraft numbers on NJI and NJA are similar, they are not the same. Flight manuals and personnel policies are being integrated, but they remain separate at this time.

NJI and NJA flight attendants have distinct uniforms. Additionally, NJI and NJA flight crews have distinct employee badges displaying either NJI or NJA as the operating entity.

At this time, there is insufficient evidence of operational integration to find that NJI and NJA are a single transportation system. This decision is based on the facts and circumstances of this case. Future changes on NJI and NJA may lead to a different result. *See Allegheny Airlines, Inc.*, 29 NMB 160 (2002).

CONCLUSION

The Board finds that NJI and NJA are not operating as a single transportation system for representation purposes under the RLA for the craft or class of Flight Attendants.

Due to the unusual circumstances of this case, the Investigator will continue to accept additional authorization cards for 14 calendar days from the date of this determination. Any Intervenor has 14 calendar days from the date of this determination to file an application supported by a showing of interest of at least 35 percent of the flight attendants at NJI.

By direction of the NATIONAL MEDIATION BOARD.



Mary L. Johnson
General Counsel

Copies to:

Harry Risetto, Esq.
Jonathan Fritts, Esq.
Jennifer Beale, Esq.
Edward Gilmartin, Esq.
Veda Shook
Deirdre Hamilton, Esq.
David Bourne
Allen Price
Joshua McInerney, Esq.

Chairman Dougherty, dissenting.

I dissent from the Board's decision finding that NJI and NJA do not constitute a single transportation system.

At NJI and NJA, there is complete consolidation and integration of the following functions: labor relations, human resources, financial, legal, sales and marketing, information technology, purchasing, aircraft acquisition, and owner services. The same individual is the Chairman and sole Director of both carriers. See *Chautauqua Airlines/Shuttle America/Republic Airlines/Midwest Airlines/Frontier Airlines/Lynx Aviation*, 37 NMB 148 (2010) (consolidation of senior managers, personnel functions and labor relations are often indicia of single transportation systems); *Delta Air Lines, Inc./Northwest Airlines, Inc.*, 36 NMB 36 (2009)(the Board finds a single transportation system only when there is substantial integration of operations, financial control, and labor and personnel functions); *Precision Valley Aviation, Inc., d/b/a Precision Airlines*

and Valley Flying Serv., Inc., d/b/a Northeast Express Reg'l Airlines, 20 NMB 619 (1993)(finding a substantial degree of overlapping ownership, senior management, and Boards of Directors is critical to finding a single transportation system).

NetJets holds NJI and NJA out to the travelling public as a single carrier. Both NJI and NJA are marketed under the same "NetJets" brand. Livery is virtually identical. Owners/customers can book flights on either entity through the same portal on the NetJets website, and they are likely unaware there is any difference between the two. NetJets fulfills customer requests using either entity at its discretion.

Integration of operations is further indicated by the fact that flight manuals for pilots and flight attendants and personnel policies are being integrated, and payroll services for both entities were combined as of January 1, 2010. Additionally, NJI and NJA flight attendants use common lockers and closets and overnight together at the same hotels.

Based on the Board's "substantial integration" criteria, NJI and NJA are operating as a single transportation system.

The only two details that do not support a finding of *total* integration are the existence of separate operating certificates and the fact that the flight attendants have not been integrated. These facts do not dictate a finding that NJI and NJA do not operate as a single carrier.

The lack of a single operating certificate is not dispositive, and the Board frequently finds the existence of a single carrier in spite of separate operating certificates. See *Chautauqua Airlines/Shuttle America/Republic Airlines/Midwest Airlines/Frontier Airlines/Lynx Aviation*, 37 NMB 148 (2010), *Atlas Air, Inc./Polar Air Cargo Worldwide, Inc.*, 35 NMB 259 (2008); *US Airways, Inc./America West Airlines, Inc.* 33 NMB 339 (2006); *US Airways, Inc./America West Airlines, Inc.* 33 NMB 221 (2006); *US Airways, Inc./America West Airlines, Inc.* 33 NMB 151 (2006); *US Airways, Inc./America West Airlines, Inc.* 33 NMB 49 (2006); *American Airlines, Inc./Trans World Airlines, LLC*, 29 NMB 240 (2002); *American Airlines, Inc./Trans World Airlines, LLC*, 29 NMB 223 (2002); *American Airlines, Inc./Trans World Airlines, LLC*, 29 NMB 201 (2002); *Flagship Airlines, Inc./Executive Airlines, inc./Wings West Airlines, Inc./Simmons Airlines, Inc./AMR Eagle, Inc./AMR Corp., and American Airlines*, 22 NMB 331 (1995); *Continental Airlines/Continental Express*, 20 NMB 326 (1993); *Midway Airlines, Inc.*, 14 NMB 447 (1987).

In *Atlas Air, above*, the Board found a single transportation system in spite of separate operating certificates and separate crews where the two entities at issue shared common management and labor relations functions and company publications identified the close link between the two entities.

The Board has also found existence of a single carrier where the work groups at issue have not been integrated. *USAir, Inc. and Shuttle, Inc. d/b/a USAir Shuttle*, 19 NMB 388 (1992). Significantly, in that case, the carriers also had separate operating certificates.

Cases where the Board has failed to find a single transportation system are clearly distinguishable. In *Airtran Airways*, 25 NMB 24 (1997), the Board found no single transportation system where the management structure had not been combined and labor relations and personnel functions were administered separately. In *Frontier Airlines*, 24 NMB 635 (1997), the Board found that there was no single carrier for representation purposes where the Carriers operated under separate management structures. In *GoJet Airlines, LLC and Trans States Airlines, Inc.*, 33 NMB 24 (2005), the Board found there was no single transportation system where the two carriers continued to operate under separate management, separate labor relations and terms and conditions of employment, and each carrier retained its own website with no links or information about the other.

The Board's standard for finding the existence of a single carrier is *substantial* integration, and it is well settled that the Board does not require *total* integration. *US Airways/America West Airlines*, 35 NMB 65 (2008); *Allegheny Airlines, Inc. and Piedmont Airlines, Inc.*, 32 NMB 21 (2004); *Air Methods/CJ Sys.*, 35 NMB 59 (2008); *American Airlines, Inc./TWA Airlines, LLC*, 29 NMB 201 (2002); *Mountain Air Express/Air Wisconsin Airlines Corp.*, 26 NMB 185 (1999). Given the complete consolidation of corporate functions, the integration of personnel policies and procedures, and the unified way the entities are held out to the travelling public, it is difficult to see how the integration of the two carriers is not substantial. Because I believe these entities easily meet the Board's test, I would find the existence of a single carrier. For these reasons, I dissent from the Majority decision.