



July 28, 2008

Mary L. Johnson
National Mediation Board
1301 K Street, N.W. Suite 250 East
Washington, D.C. 20572

**Re: Public Comments on the NMB's Representation Manual
35 NMB No. 61**

Dear Ms. Johnson:

The Transportation Trades Department, AFL-CIO (TTD), requests a 60 day extension of the comment period on the proposed changes to the Representation Manual described in your Notice dated July 15, 2008 (35 NMB No. 61). TTD consists of 32 affiliated unions, most of which represent workers covered by the Railway Labor Act (RLA) and would thus be directly affected by these proposed changes.

Your Notice includes several significant and hostile changes to rules that will govern how the Board will conduct representation elections and address other representation disputes. As a general matter, the changes being proposed are often ambiguous and open to wide interpretation.

The creation of a new sub-selection (19.701) alone would make it harder for workers to retain their union representation in a merger between two carriers where workers are represented at one carrier but not the other. Requiring a union to demonstrate membership of "more than a substantial majority, as determined by the Board" before certification is extended creates an ambiguous and artificially high burden on workers who simply want to enjoy the benefits of collective bargaining. Furthermore, the timing of this proposed change, coming after the merger between Delta and Northwest has been formally announced and is now pending, is especially suspect. We simply see no justification for this change and the Board has offered no explanation for why it is needed or issued any guidance on how the new policy would be implemented.

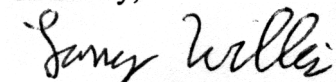
The Board's request for comments is of course welcome and it is our intent to submit comments. But given the reach and impact of the Board's proposal, 30 days is not sufficient for TTD and our affected unions to fully evaluate and analyze the proposal and respond in a comprehensive manner. Furthermore, TTD is aware that a number of Members of Congress, on both sides of aisle, are also concerned with the Board's proposed changes and may like the opportunity to participate in the comment process. We note that both the House and Senate are scheduled to recess later this week and will be in the middle of their annual August recess when the current comment period closes.



For these reasons, we believe that a 60 day extension (requiring comments to be filed by October 15, 2008) is both needed and justified. In addition, the Board should convene a public hearing on the proposal so that parties can more fully explain their concerns and the Board can directly respond to some of the ambiguities created by its Notice.

Thank you in advance for your consideration of our request. Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,



Larry I. Willis
General Counsel