



**ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS**

*Proudly representing the Flight Attendants of American Airlines*

April 1, 2019

Dear Chairman Fortson:

The Association of Professional Flight Attendants (APFA), the largest independent flight attendant union in our country, vehemently opposes the current proposed rule (Docket No. C-7198) on union decertification procedures under the Railway Labor Act (RLA).

The RLA has been in existence, largely without edit, for nearly 100 years now. This is not by accident. Indeed, the National Mediation Board (NMB) has previously specifically declined any rulemaking that would go beyond that *required* by statute. This proposed rule is not only a departure from precedent, but a departure from the RLA itself, which is purposely silent on decertification. The world in which railway and air workers operate is vastly different than any other in this country, and as such, the rules and procedures that govern us are different. Again, this is not by accident. The workers under the RLA's scope are well-versed with its requirements and the uniqueness under which we operate, including how to organize and how to change representation if desired. The proposed rule is attempting to fix something that is not broken.

As for the proposed two-year bar, it is nothing but a blatant attack on destabilizing the work force. The existence of the two-year bar once a union is brought on a property has been well-explained: it's to protect a new union's ability to obtain a first contract. Again, due to the uniqueness of the RLA, obtaining a first (or any) contract is often a lengthier process than under the National Labor Relations Act (NLRA). To strip a work force's right to have initial representation for less than two years is an attack on organized labor.

While we respect the NMB and its rulemaking authority, we do not believe the proposed rule is within the scope of the NMB's jurisdiction, and oppose it and the damaging effect we believe it will have on this nation's work force.

Respectfully,

Lori Bassani  
National President  
Association of Professional Flight Attendants