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*Rhode Island's resource for business advocacy, action, progress and policies.*



August 16, 2011

To: National Labor Relations Board

As President of the Greater Providence Chamber of Commerce, Rhode Island's largest business advocacy organization (serving 1800 members), I am writing in opposition to the National Labor Relations Board's ("NLRB" or "Board") proposal that alters its process for union representation.

The proposed rules represent one of the most significant changes in union election rules in decades, and these modifications are concerning to the business community. As drafted, the rules do not properly balance the rights of employees, employers and labor unions. Specifically, the shortened timeframe for union election campaigns; the limitations to employers filing the Statement of Position; the ambiguous nature of the Employee Disclosure Mandate; and deferral of representational disputes until post union elections; deprives employers of their due process rights under the National Labor Relations Act. The proposed rules would have a particularly adverse impact on the nation's small business community, at a time when our country's unemployment rate is over 9%. The economic turmoil currently impacting commerce across the country has particularly been detrimental to Rhode Island's small business community, which comprises over 95% of our membership.

I do not believe that there is a need for such wholesale changes to the election rules, nor do I believe that the need for such drastic changes has been adequately demonstrated. The detrimental impact of the altered provisions to employers will likely increase litigation related to election proceedings, rather than expedite them; and the costs associated with fighting these rules could, potentially be the last straw for our already fragile business climate.

Given the burdensome impact of these regulations on employers and the nation's challenging economic conditions, I respectfully request that this proposal be withdrawn.

Regards,

Laurie White  
President