



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD

Washington, D.C. 20570

March 31, 2014

The Honorable John Kline, Chairman
The Committee on Education and the Workforce
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Phil Roe, M.D., Chairman
The Subcommittee on Health, Employment, Labor, and Pensions
U.S. House of Representatives
2181 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Kline and Chairman Roe:

I write in response to your March 25, 2014, letter requesting a 30-day extension of the comment period for the National Labor Relations Board's (Board) February 6, 2014 representation-case procedures proposed rule (RIN 3142-AA08).

I appreciated the opportunity to meet with you and discuss the representation-case procedure proposed rule earlier this month. As I shared with you in our discussion, the Board is unanimous in its support for effective representation case procedures. All Members agree that there are important issues involved in this proposal. We want to ensure that the public has adequate time to consider the proposed changes and offer comment.

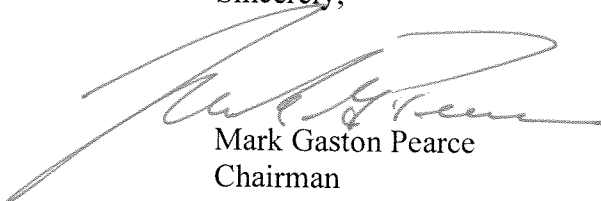
As you know, the Notice of Proposed Rulemaking (NPRM) established a 60-day initial comment period to be followed by a 7-day reply period. In addition, the Board issued a notice of public hearing during the reply comment period in order to receive oral presentations on the proposal. Every request to speak at the hearing was granted. Furthermore, the NPRM makes it clear that the Board will consider all comments and oral testimony submitted in response to the June 22, 2011 NPRM. So, it is not necessary for any person or organization to resubmit any comment or repeat any argument that has already been made.

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A majority of the Board believes that all persons interested in the proposed amendments, including those in the best position to provide informed comment on the details of the Board's representation case procedures -- the attorneys and other practitioners who regularly participate in representation proceedings -- will have ample time and opportunities to do so within the 60-day comment period.

If you have any further questions or need further assistance, please feel free to contact Celine McNicholas, Special Counsel for Congressional and Intergovernmental Affairs, at (202) 273-0808.

Sincerely,



Mark Gaston Pearce
Chairman

cc: The Honorable George Miller, Senior Democratic Member,
The Committee on Education and the Workforce