



Office of the General Counsel

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August 22, 2011

Lester A. Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street, NW
Washington, DC 20570

Re: Notice of Proposed Rule Making RIN 3142-AA08;
76 Federal Register 36812 (June 22, 2011)

Dear Mr. Heltzer:

The Office of Domestic Social Development/Department of Justice, Peace, and Human Development, United States Conference of Catholic Bishops ("DSD/USCCB") submits the following comments to the National Labor Relations Board ("NLRB") on the above referenced proposed rule that would amend 29 CFR parts 101, 102, and 103, which govern union representation. The proposed regulation would make changes to the pre- and post-election procedures in the representation case process.

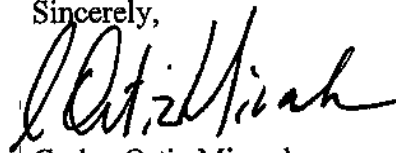
The DSD/USCCB commends the Department of Labor for efforts to protect the rights of workers. The DSD/USCCB is not addressing the merits of post-election procedures; the interest in pre-election procedures extends only to the extent to which proposed changes facilitate the ability of workers to have a free, fair, and prompt election. The Catholic bishops of the United States are not labor lawyers nor experts in union/employer relations; comments regarding the merits of the proposed regulation are not based on case law, but rather a Catholic tradition that teaches workers have a right to choose or not choose to join a union and maintains their dignity as the central interest in every economic decision.

The Catholic bishops of the United States have a long history of support for workers and their unions, and the bishops acknowledge the tensions that can exist between labor and employers. Both sides have rights and responsibilities to ensure that workers receive just remuneration for their labor and have a safe and healthy workplace.

Catholic teaching recognizes the human right of association, which in the workplace is often manifest in the form of unions and collective bargaining. At their best, unions exist to protect the rights of workers and advance the common good. Pope Benedict XVI stated, "Through the combination of social and economic change, trade union organizations experience greater difficulty in carrying out their task of representing the interests of workers, partly because Governments, for reasons of economic utility, often limit the freedom or the negotiating capacity of labour unions. . . . The repeated calls issued within the Church's social doctrine . . . for the promotion of workers' associations that can defend their rights must therefore be honored today even more than in the past." (*Charity in Truth*, no. 25)

DSD/USCCB urges the NLRB to issue a final rule that reflects these rights of workers and facilitate free, fair, and prompt elections.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Ortiz Miranda". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Carlos Ortiz Miranda
Associate General Counsel