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July 6, 2011

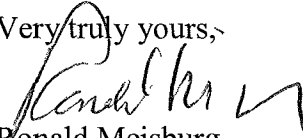
BY FAX

Mr. Lester Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street N.W.
Washington, DC 20570

Re: RIN 3142-AA08 (Notice of Proposed Rule Making)
Request to Extend Time for Submission of Comments,
Reschedule Existing Hearing and Schedule Additional Hearings

Dear Mr. Heltzer:

Faxed herewith is a Request to Extend Time for Submission of Comments, Reschedule Existing Hearing and Schedule Additional Hearings, which is filed by their respective counsel on behalf of the parties identified in the Request. Copies of the original will be sent to you by overnight delivery. Thank you for your attention to this matter.

Very truly yours,

Ronald Meisburg

Enclosure

cc: Peter N. Kirsanow, Esq.
Charles I. Cohen, Esq.
Philip A. Miscimarra, Esq.
Harold P. Coxson, Esq.
Harold R. Weinrich, Esq.
Andrew M. Kramer, Esq.
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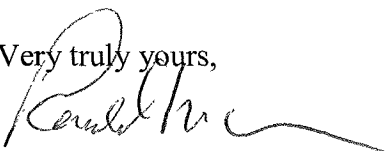
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1099 14th Street N.W.
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Re: RIN 3142-AA08 (Notice of Proposed Rule Making)
Request to Extend Time for Submission of Comments,
Reschedule Existing Hearing and Schedule Additional Hearings

Dear Mr. Heltzer:

Enclosed herewith are the original and eight copies of a Request to Extend Time for Submission of Comments, Reschedule Existing Hearing and Schedule Additional Hearings, which is filed by their respective counsel on behalf of the parties identified in the Request. Thank you for your attention to this matter.

Very truly yours,



Ronald Meisburg

Enclosure

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NATIONAL LABOR RELATIONS BOARD

In the Matter of:)	
)	RIN 3142-AA08
)	(76 Fed. Reg. 15037
NOTICE OF PROPOSED RULE MAKING)	and
)	76 Fed. Reg. 37291)
)	
Representation Case Procedures)	

REQUEST TO EXTEND TIME FOR SUBMISSION OF COMMENTS, RESCHEDULE
EXISTING HEARING AND SCHEDULE ADDITIONAL HEARINGS

The parties identified below hereby request that the Board to enter an order:

1. Extending the time within which public comments will be received by the Board for ninety days, from August 21, 2011, to and including November 19, 2011, with the understanding that because the ninety-day extension period ends on a Saturday, the comment deadline will be Monday, November 21, 2011.
2. Providing 14 days from November 21, 2011, to and including December 5, 2011, for the filing of responsive comments.
3. Postponing the public hearing currently scheduled in Washington, DC, for July 18 and 19, 2011, to a date or dates at least thirty days after December 5, 2011.
4. Scheduling, on dates at least thirty days after December 5, 2011, at least four additional hearings at locations around the United States convenient to persons and organizations who may wish to testify before the Board with respect to the proposed regulations.

As grounds for granting this request, the parties state that:

(1) the significant and substantial changes that may be brought about by the proposed regulations, some of which may not be readily apparent without further consideration and study, do not allow for the filing of complete and comprehensive comments within the time currently allowed;

(2) the problem of the short current deadline is compounded by the fact that the proposed regulations must be studied and comments on them developed, drafted, revised and filed over the months of July and August, when many of the persons necessary to carefully evaluate the proposed regulations, such as managers, attorneys and other advisers, may be effectively unavailable because of travel and family plans and commitments;

(3) typically in rulemaking the public hearings are utilized as an adjunct to written comments after the written comments have been filed, with the written comments serving as the basis of a give and take between the Board and members of the public, and furthering the goal of having a full explication of the proposed rules and suggested alternatives;

(4) the utility of hearings is enhanced when they are also held outside the confines of Washington, DC, at convenient locations around the United States, which allows the opportunity for a greater variety and cross section of affected parties to speak directly to the Board and allows the Board to ask questions of the speakers;

(5) both the substance and appearance of good government – and thus, the efficacy of the proposed rules – will be enhanced if the Board does not – and does not appear to – “rush to judgment”, but instead allows the reasonable time and occasions necessary all stakeholders – employers, unions, employees, and their representatives,

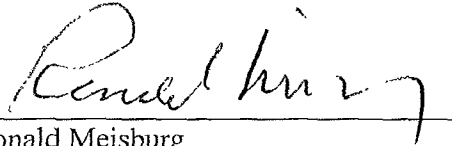
attorneys and advisers – to fully and fairly participate in a process which may potentially have great impact on their work, life and livelihood;

(6) the requested process is similar to that which was followed by the Board in the promulgation of the health care rules nearly thirty years ago, and the success of those rules is testament to the wisdom of utilizing the same or similar process with respect to the proposed rules under consideration in this proceeding.

The undersigned counsel represents that he has been authorized to present this request on behalf of each of the counsel who represent their respective clients named below. Each party has requested an opportunity to appear and make a presentation at the July 18-19 hearing, and the request for postponement of that hearing is made without prejudice to our respective requests to appear.

In view of the foregoing, the parties ask that this request be granted.

Respectfully submitted,



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