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Via Electronic Mail at OLA-efile@nmb.gov

Eileen M. Hennessey, Investigator
Angela I. Heverling, Investigator
National Mediation Board
1301 K Street, NW, Suite 250 East
Washington, DC 20005

RE: US Airways / IBT / IAM
Mechanics and Related Employees
NMB Case No. R-7362

Dear Investigators Hennessey and Heverling:

The International Association of Machinists and Aerospace Workers, AFL-CIO ("IAM") hereby requests that the National Mediation Board ("NMB") investigate whether the forgery of authorization cards may have tainted the election application filed by the International Brotherhood of Teamsters ("IBT" or "Teamsters") to represent the mechanic and related employees at US Airways. The Transport Workers Union, AFL-CIO ("TWU") recently submitted declarations from sources who worked within the Teamster's organization indicating that authorization cards were forged in connection with the IBT's effort to represent mechanic and related employees at American Airlines. Although IBT initially dismissed TWU's forgery allegations as "baseless," yesterday in response to TWU's evidentiary submission the IBT conceded that the forgery charges "*are most troubling and raise very serious concerns for all involved.*" IBT Letter to NMB, dated 7/29/2013 (emphasis added). Significantly, IBT does not deny the TWU's charges.

Indeed, TWU's evidence is very concerning. TWU's declarations indicate that a paid IBT staff organizer engaged in the falsification of cards on a large scale, involving "authorization cards from at least 1500 workers who had never been seen, spoken to, or assessed." TWU Submission, Ex. 5. The declarants further attest that managers in the IBT organizing department were aware of the falsification of cards. Instead of taking corrective action, however, IBT management attempted to cover up the problem by transferring rather than terminating the organizer and by "concealing the facts from the NMB." *Id.* Thus, this matter goes beyond misconduct on the part of an individual organizer and suggests a systemic problem.

Equally troubling is the IBT's most recent response to TWU's charges. When TWU first raised the forgery issue and before it submitted evidence to the NMB in the form of declarations,

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IBT attempted to dismiss the allegations by characterizing them as “baseless.” However, now that TWU has submitted credible evidence and requested that the NMB investigate further, the IBT response is markedly changed. Now, IBT concedes that the charges are a “serious matter” and “are most troubling and raise very serious concerns for all involved.” IBT Letter to NMB, dated 7/29/2013. It bears emphasis that the Teamsters have not denied any of the factual allegations made by the TWU declarants.

In addition, IBT now requests a full month to respond to the TWU’s evidence, seeking an extension of time until August 23, 2013. The IBT makes this request despite arguing only a few weeks ago that the NMB should process its application more quickly. It is notable that the IBT is seeking to delay filing a substantive response to the TWU’s evidence until after the vote tally is scheduled at US Airways. Plainly, IBT seeks to insure that US Airways mechanic and related employees do not have the benefit of the Board’s full investigation of the falsification of cards prior to the end of their own election.

From the outset, the IBT’s campaigns at American and US Airways have been coordinated in anticipation of the soon-to-be-consummated merger of the two carriers. In light of the interrelated nature of the two campaigns, it is appropriate that the NMB investigate whether or not the IBT submitted forged cards in support of its application at US Airways. The Board should give no less scrutiny to the cards submitted in this closely related proceeding than it will to the cards submitted by the same organization only a month later at American.

In particular, the IAM encourages the Board to investigate closely authorization cards submitted on behalf of furloughed US Airways mechanic and related employees. In its own campaign efforts, the IAM has been unable to contact many furlougees at their last known address. Under the circumstances, the submission of cards purportedly from these furlougees would be suspect. In order to assist the Board, the IAM will provide to the investigators under separate cover a list of 425 furlougees who no longer reside at their last known address.

If you have any questions regarding this matter, please do not hesitate to contact me.

Yours truly,



Carmen R. Parcelli
Counsel for the IAM

CERTIFICATE OF SERVICE

I hereby certify that this 30th day of July 2013 a copy of the foregoing submission was served via electronic filing upon the following:

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A handwritten signature in cursive script, appearing to read 'C. Parcelli', is written over a horizontal line.

Carmen R. Parcelli
Counsel for the IAM