



American Federation
of Teachers, AFL-CIO

AFT Teachers
AFT PSRP
AFT Higher Education
AFT Public Employees
AFT Nurses and Health
Professionals

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September 22, 2020

Roxanne Rothschild
Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington DC 20580-0001

Dear Ms. Rothschild:

The American Federation of Teachers requests that the National Labor Relations Board extend the comment period for the Notice of Proposed Rulemaking, Representation-Case Procedures: Voter List Contact Information; Absentee Ballots for Employees on Military Leave, 85 FR 45553 (July 29, 2020). We request an extension of no less than 30 days.

In the NPRM, the Board proposes to change the categories of information that will be included in voter lists based in large part on privacy concerns about employee data. The Board also proposes to introduce absentee ballots into the election process. These are significant changes that implicate not only a wide range of workplaces, but also the methods by which employees communicate, and how these methods have changed due to the COVID-19 pandemic.

In order to evaluate the full impact of the NPRM and prepare comments that would be most helpful to the Board, we request the NLRB extend the comment period by at least 30 days.

Sincerely,

/s Jessica Rutter

Jessica Rutter
Assistant Director, Legal Department
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The American Federation of Teachers is a union of professionals that champions fairness; democracy; economic opportunity; and high-quality public education, healthcare and public services for our students, their families and our communities. We are committed to advancing these principles through community engagement, organizing, collective bargaining and political activism, and especially through the work our members do.