



June 16, 2010

The National Labor Relations Board
Washington, DC 20570

Dear Chairman Liebman and Members of the Board:

We are writing to express our strong concern with the National Labor Relations Board's (NLRB) recent request for information regarding the use of electronic voting during union organizing elections. Among other adverse impacts, using electronic means to permit off-site, or remote, voting during union organizing elections will subject employees to a level of intimidation and coercion that does not occur during an on-site, private ballot election that is directly supervised by the NLRB.¹ Furthermore, electronic voting bears a striking resemblance to the card-check scheme that Americans – and union households – are overwhelmingly opposed to because it effectively eliminates the secret ballot.

The Coalition for a Democratic Workplace (CDW), a group of more than 580 organizations, is united in opposition to legislation pending in the U.S. Congress, the *Employee Free Choice Act* (EFCA), because we believe this bill severely undermines the employee privacy protections that have been a long-standing hallmark of federal labor law. Similarly, CDW is committed to ensuring that the principles of EFCA--- namely, restructuring the way union elections are conducted in order to give professional union organizers an advantage at the expense of employee privacy and a full debate over the merits of unionization---are not enacted by the Board through the regulatory process or otherwise. Electronic voting from off-site locations raises the same concerns as the card-check process outlined in EFCA.

The most glaring flaw in a plan to employ electronic voting is the inability of the NLRB to oversee the actual casting of ballots. By requiring employees to vote from their home computer or other location where the Board cannot ensure privacy equal to that of the ballot booth, the

¹ While the Board currently allows mail ballot elections in rare situations where barriers exist to conducting an onsite election because eligible voters are scattered due to locations, work schedules, strikes or lock outs, the RFI suggests services are sought to replace secret ballot elections rather than the Board's existing mail ballot procedures. Specifically, the RFI states, "*The NLRB's requirements are for the acquisition of electronic voting services to support conducting secret-ballot elections to determine representation issues.*"

Board will expose employees to increased risks of intimidation and coercion by professional union organizers or co-workers.

The National Labor Relations Act currently allows professional union organizers to target individuals by visiting them at their homes, and any other location outside the workplace; a privilege of which they regularly take advantage. It does not take much imagination to envision a professional union organizer visiting an individual's home to make sure they had voted electronically, and even offering to "help" them cast their vote.

The departure from the traditional, private ballot election would be a drastic change that could have a negative impact on hard-working men and women throughout the country, subjecting them to greater harassment during union organizing campaigns, and potentially imposing on them a union they did not want. Such a dramatic policy change should not be enacted through regulatory fiat or other Board action.

And, finally, CDW has often recognized that the current private ballot process benefits both the employee and the unions. NLRB annual reports consistently show that a majority of elections are conducted within 38 days (down from 50 days in 1980), and that more than 90% of elections are conducted in less than two months. Along with that, in 2009, unions won 68.5% of workplace elections held. These numbers hardly seem to merit sacrificing the employee protections that come with on-site, NLRB-supervised, private ballot elections.

Thank you for your consideration of our concerns, and we hope that the Board will continue to act in the best interest of *employees* rather than special interests.

Sincerely,

The Coalition for a Democratic Workplace

60 Plus Association
Advanced Supply Chain International
Aeronautical Repair Station Association
Aerospace Industries Association
Affiliated Chambers of Commerce of
Greater Springfield (MA)
Alabama Chapter of ABC
Alabama Restaurant Association
Alaska Cabaret, Hotel, Restaurant &
Retailers Association
Alaska Chapter of ABC
Alaska Hotel & Lodging Association
Alliance for Worker Freedom
Aluminum Association
American Apparel & Footwear Association
American Association of Homes & Services
for the Aging

American Bakers Association
American Beverage Association
American Boiler Manufacturers Association
American Concrete Pressure Pipe
Association
American Conservative Union
American Council of Engineering
Companies
American Fire Sprinkler Association
American Foundry Society
American Frozen Food Institute
American Health Care Association
American Home Furnishings Alliance
American Hospital Association
American Hotel & Lodging Association
American International Automobile Dealers
Association

American Meat Institute
American Moving & Storage Association
American Mushroom Institute
American Nursery & Landscape Association
American Pipeline Contractors Association
American Rental Association
American Rental Association of California
American Rental Association of Maryland
American Rental Association of Massachusetts
American Rental Association of Nebraska
American Rental Association of Wisconsin
American Resort Development Association
American Seniors Housing Association
American Shareholders Association
American Society for Healthcare Human Resources Administration
American Society of Employers
American Staffing Association
American Supply Association
American Trucking Associations
American Wholesale Marketers Association
Americans for a Limited Government
Americans for Prosperity
Americans for Tax Reform
Antelope Valley Chamber of Commerce
API
Arcadia (CA) Chamber of Commerce
Arizona Builders Alliance of ABC
Arizona Chamber of Commerce & Industry
Arizona Hotel & Lodging Association
Arizona IEC
Arizona Restaurant & Hospitality Association
Arkansas Associated Builders & Contractors
Arkansas Hotel & Lodging Association
Arkansas IEC
Arkansas Rental Association
Arkansas State Chamber of Commerce
Asheboro/Randolph (NC) Chamber of Commerce
Ashland & Tri State Area Chapter IEC
Asian American Hotel Owners Association
Assisted Living Federation of America
Associated Builders & Contractors
Associated Builders & Contractors Heart of America Chapter
Associated Builders & Contractors of Alabama
Associated Builders & Contractors of Hawaii
Associated Builders & Contractors of Los Angeles/Ventura
Associated Builders & Contractors of Michigan
Associated Builders & Contractors of Texas
Associated Equipment Distributors
Associated General Contractors
Associated Industries of Massachusetts
Associated Rental Stores of Kansas City
Association for Manufacturing Technology
Association of Equipment Manufacturers
Association of Millwork Distributors
Association of Washington Business
Association of Woodworking & Furnishings Suppliers
Atlanta Hotel Council
Automotive Aftermarket Industry Association
Baltimore Metro Chapter of ABC
Bearing Specialists Association
Brick Industry Association
Burnsville (MN) Chamber of Commerce
Business & Industry Association of New Hampshire
Business Solutions Association
California Chamber of Commerce
California Delivery Association
California Hotel & Lodging Association
California Manufacturers & Technology Association
California Restaurant Association
California/Nevada/Arizona Automotive Wholesalers Association
Camarillo (CA) Chamber of Commerce
Capital Associated Industries Inc
Carolina Ready Mixed Concrete Association
Carolinas Chapter of ABC
Center for Freedom & Prosperity
Center for Individual Freedom
Center for the Defense of Free Enterprise

CenTex Chapter IEC
Central Alabama Chapter IEC
Central California Chapter of ABC
Central Florida Chapter of ABC
Central Indiana IEC
Central Michigan Chapter of ABC
Central Missouri IEC
Central Ohio AEC/EIC
Central Ohio Chapter of ABC
Central Pennsylvania Chapter of ABC
Central Pennsylvania Chapter of IEC
Central Texas Chapter of ABC
Central Washington IEC
Centre County (PA) IEC
Chamber of Commerce of Southwest
Indiana
Chamber of Medford/Jackson County (OR)
Charleston (SC) Metro Chamber of
Commerce
Chattanooga Area (TN) Chamber of
Commerce
Chesapeake Chapter of ABC
Chesapeake IEC
Chicago Auto Trade Association
Chicagoland Chamber of Commerce
Cincinnati Regional Chamber of Commerce
Citizen Outreach Project
Cleveland-Bradley (TN) Chamber of
Commerce
Coalition of Franchisee Associations
College & University Professional
Association for Human Resources
Colorado Association of Commerce &
Industry
Colorado Association of Homes & Services
for the Aging
Colorado Concern
Colorado Hospital Association
Colorado Hotel & Lodging Association
Colorado Restaurant Association
Commerce & Industry Association of New
Jersey
Connecticut Business & Industry
Association
Connecticut Chapter of ABC
Connecticut Restaurant Association

Consumer Electronics Association
Copper & Brass Servicenter
Cornhusker Chapter of ABC
Costa Mesa (CA) Chamber of Commerce
Council for Citizens Against Government
Waste
Cumberland Valley Chapter of ABC
Custom Electronic Design & Installation
Association
Dakotas Inc IEC/Dallas Chapter IEC
Daytona Beach/Halifax (FL) Chamber of
Commerce
Delaware Chapter of ABC
Delaware Restaurant Association
Denver Metro Chamber of Commerce
Detroit (MI) Regional Chamber of
Commerce
Duluth (MN) Area Chamber of Commerce
East Tennessee Chapter of ABC
East Tennessee IEC
East Texas IEC
Eastern Pennsylvania Chapter of ABC
Eastern Shore Chapter of ABC
Eastern Washington Chapter IEC
El Paso Chapter IEC
Electronic Security Association
Empire State Chapter of ABC
Environmental Industry Associations
Equipment Marketing & Distribution
Association
Fairfax County (VA) Chamber of
Commerce
Federation of American Hospitals
Fertilizer Institute (The)
Flagstaff (AZ) Chamber of Commerce
Florida Chamber of Commerce
Florida East Coast Chapter of ABC
Florida First Coast Chapter of ABC
Florida Gulf Coast Chapter of ABC
Florida Independent Concrete & Associated
Products, Inc.
Florida Restaurant & Lodging Association
Florida West Coast Chapter IEC
Food Marketing Institute
Forging Industry Association
Fort Worth/Tarrant County IEC

Freedom Works
Fruita Area Chamber of Commerce
Gases and Welding Distributors Association
Georgia Chamber of Commerce
Georgia Chapter of ABC
Georgia Hotel & Lodging Association
Georgia IEC
Georgia Restaurant Association
Glendale (AZ) Chamber of Commerce
Golden Gate Chapter of ABC
Goleta Valley (CA) Chamber of Commerce
Grand Junction Area (CO) Chamber of Commerce
Greater Albuquerque (NM) Chamber of Commerce
Greater Bakersfield (CA) Chamber of Commerce
Greater Cincinnati IEC
Greater Columbia (SC) Chamber of Commerce
Greater Columbus (GA) Chamber of Commerce
Greater Decatur (IL) Chamber of Commerce
Greater Delray Beach (FL) Chamber of Commerce
Greater Elkhart (IN) Chamber of Commerce
Greater Findlay (OH) Chamber Inc.
Greater Hamilton (OH) Chamber of Commerce
Greater Houston Chapter of ABC
Greater Lafayette Chamber of Commerce (LA)
Greater Louisville (KY) Inc.
Greater Medina (OH) Chamber of Commerce
Greater Pittsburgh (PA) Chamber of Commerce
Greater Pittsburgh (PA) Hotel Association
Greater Raleigh (NC) Chamber of Commerce
Greater Reading Chamber of Commerce
Greater Shreveport Chamber of Commerce
Greater Spokane Incorporated
Greater St. Louis IEC
Greater Syracuse (NY) Chamber of Commerce

Green Bay Area (WI) Chamber of Commerce
Guam Contractors Association of ABC
Hampton Area (NH) Chamber of Commerce
Hampton Roads Chapter IEC
Hartford (CT) Chamber of Commerce
Hawaii Hotel & Lodging Association
Hawaii Restaurant Association
Healthcare Distribution Management Association
Heart of America Chapter of ABC
Heating, Airconditioning & Refrigeration Distributors International
Henderson (NV) Chamber of Commerce
Hilliard (OH) Chamber of Commerce
Hispanic Alliance for Progress Institute
Hobbs (NM) Chamber of Commerce
Hospitality Association of South Carolina
Hotel Association of New York City
Hotel Association of Washington DC
Houma Chamber of Commerce
Idaho IEC
Idaho Lodging & Restaurant Association
Illinois Chamber of Commerce
Illinois Chapter of the Associated Builders & Contractors
Illinois Hotel & Lodging Association
Illinois IEC
Illinois Restaurant Association
Independent Electrical Contractors Inc
Indian River County (FL) Chamber of Commerce
Indiana Chamber of Commerce
Indiana Chapter of ABC
Indiana Motor Truck Association
Industrial Fasteners Institute
Industrial Supply Association
Inland Pacific Chapter of ABC
Interlocking Concrete Pavement Institute
International Association of Amusement Parks & Attractions
International Association of Refrigerated Warehouses
International Council of Shopping Centers
International Dairy Foods Association

International Foodservice Distributors Association
International Franchise Association
International Housewares Association
International Sign Association
International Truck Parts Association
International Warehouse Logistics Association
Iowa Association of Business & Industry
Iowa Chapter of the Associated Builders & Contractors
Iowa Restaurant Association
Iowans for Right to Work
Kansas Chamber (The)
Kansas City IEC
Kansas Restaurant & Hospitality Association
Kentuckiana Chapter of ABC
Kentucky & Southern Indiana Chapter IEC
Kentucky Chamber of Commerce
Kentucky Electrical Contractors Association
Kentucky Motor Transport Association
Kentucky Restaurant Association
Keystone Chapter of ABC
Lake Havasu Area (AZ) Chamber of Commerce
Larue County Chamber of Commerce
Las Vegas (NV) Chamber of Commerce
Las Vegas Chapter of ABC
Licking County (OH) Chamber of Commerce
Little Rock (AR) Chamber of Commerce
Long Beach Area Chamber
Louisiana Association of Business & Industry
Louisiana Rental Association
Louisiana Restaurant Association
Louisiana Retailers Association
Lower Bucks County (PA) Chamber of Commerce
Lubbock Chapter IEC
Maine Chapter of ABC
Maine Innkeepers Association
Maine Restaurant Association
Management Association of Illinois (The)
Manufactured Housing Institute

Manufacturers' Association of NW Pennsylvania
Maryland Hotel, Motel & Resort Association
Maryland Motor Truck Association
Massachusetts Chapter of ABC
Massachusetts Restaurant Association
Material Handling Equipment Distributors Association
MEC-IEC of Dayton, OH
Messenger Courier Association of the Americas
Metals Service Center Institute
Metro Washington Associated Builders & Contractors
Metro West (MA) Chamber of Commerce
Michigan Beer & Wine Wholesalers Association
Michigan Chamber of Commerce
Michigan Manufacturers Association
Michigan Restaurant Association
Mid Gulf Coast Chapter of ABC
Mid Tennessee Chapter of ABC
Mid-America Lumbermens Association
Mid-Oregon Chapter IEC
Mid-South Chapter IEC
Midwest Equipment Rental Association
Midwest IEC
Minnesota Chapter of ABC
Minnesota Grocers Association
Minnesota Lodging Association
Minnesota Rental Association
Minnesota Restaurant Association
Minnesota Trucking Association
Mississippi Associated Builders & Contractors
Mississippi Economic Development Council
Mississippi Hospitality & Restaurant Association
Mississippi Manufacturers Association
Missouri Restaurant Association
Monroe (LA) Chamber of Commerce
Montana Chamber of Commerce
Montana IEC
Montana Motor Carriers Association
Montana Restaurant Association

Montgomery Area (AL) Chamber of
Commerce
Motor & Equipment Manufacturers
Association
Mountain States Employers Council, Inc.
Nashville IEC
Natchitoches Area (LA) Chamber of
Commerce
National Alliance for Worker & Employer
Rights
National Apartment Association
National Association of Chemical
Distributors
National Association of Home Builders
National Association of Manufacturers
National Association of Mutual Insurance
Companies
National Association of Real Estate
Investment Trusts
National Association of Sign Supply
Distributors
National Association of Theatre Owners
National Association of Wholesaler-
Distributors
National Automobile Dealers Association
National Center for Assisted Living
National Club Association
National Council of Agricultural Employers
National Council of Chain Restaurants
National Council of Farmer Cooperatives
National Council of Textile Organizations
National Electrical Manufacturers
Association
National Federation of Independent
Business
National Franchisee Association
National Grocers Association
National Lumber & Building Material
Dealers Association
National Mining Association
National Multi Housing Council
National Newspaper Association
National Pest Management Association
National Petrochemical & Refiners
Association
National Precast Concrete Association

National Private Duty Association
National Propane Gas Association
National Ready Mix Concrete Association
National Restaurant Association
National Retail Federation
National Roofing Contractors Association
National Small Business Association
National Solid Wastes Management
Association
National Stone, Sand & Gravel Association
National Systems Contractors Association
National Tank Truck Carriers, Inc.
National Taxpayers Union
National Tooling & Machining Association
National Utility Contractors Association
Nebraska Chamber of Commerce &
Industry
Nebraska Grocery Industry Association
Nebraska Hotel & Motel Association
Nebraska Restaurant Association
Nevada Hotel & Lodging Association
Nevada Manufactures Association
Nevada Restaurant Association
New England IEC
New Hampshire Lodging & Restaurant
Association
New Hampshire/Vermont Chapter of ABC
New Jersey Business & Industry
Association
New Jersey Chapter of ABC
New Jersey Electrical Contractors
Association
New Jersey Food Council
New Jersey IEC
New Jersey Motor Truck Association
New Jersey Restaurant Association
New Mexico Chapter of ABC
New Mexico Lodging Association
New Mexico Restaurant Association
New Orleans/Bayou Chapter of ABC
New York State Hospitality & Tourism
Association
New York State Restaurant Association
Newspaper Association of America
North Alabama Chapter of ABC

North American Die Casting Association
North American Equipment Dealers
Association
North Carolina Chamber of Commerce
North Carolina Restaurant & Lodging
Association
North Dakota Chamber of Commerce
North Dakota Hospitality Association
North Florida Chapter of ABC
North Las Vegas (NV) Chamber of
Commerce
Northeastern Retail Lumber Association
Northern Allegheny County (PA) Chamber
of Commerce
Northern Kentucky Chamber of Commerce
Northern New Mexico IEC
Northern Ohio Chapter of ABC
Northern Ohio Electrical Contractors
Association
Northern Palm Beach Chamber
Northwest Pennsylvania IEC
Northwest Washington IEC
NPTA Alliance
Offshore Marine Service Association
Ohio Chamber of Commerce
Ohio Hotel & Lodging Association
Ohio Manufacturers Association
Ohio Restaurant Association
Ohio Valley Chapter of ABC
OKC Inc IEC
Oklahoma Chapter of ABC
Oklahoma Hotel & Lodging Association
Oklahoma Rental Association
Oklahoma Restaurant Association
Oklahoma State Chamber
Optical Laboratories Association
Oregon IEC
Oregon Lodging Association
Oregon Restaurant Association
Owatonna Area (MN) Chamber of
Commerce & Tourism
Oxnard (CA) Chamber of Commerce
Pacific Northwest Chapter of ABC
Pacific Printing & Imaging Association
Pelican Chapter of the Associated Builders
& Contractors

Pennsylvania Chamber of Business &
Industry
Pennsylvania Restaurant Association
Pennsylvania Tourism & Lodging
Association
Petroleum Equipment Institute
Plumbing-Heating-Cooling Contractors
Association
Portland Cement Association
Precision Metalforming Association
Printing & Graphics Association Mid
Atlantic
Printing & Imaging Association Mountain
States
Printing & Imaging Association of Georgia,
Inc.
Printing & Imaging Association of Mid
America
Printing & Imaging Association of New
York State
Printing Association of Florida, Inc.
Printing Industries Association Inc. Serving
Northern Kentucky & Ohio
Printing Industries Association of San Diego
(CA)
Printing Industries Association of the South,
Inic.
Printing Industries Association, Inc. of
Arizona
Printing Industries Association, Inc. of
Southern California
Printing Industries of America
Printing Industries of Michigan, Inc.
Printing Industries of New England
Printing Industries of Northern California
Printing Industries of St. Louis (MO)
Printing Industries of the Gulf Coast
Printing Industries of the Midlands, Inc.
Printing Industries of Utah
Printing Industries of Virginia
Printing Industries of Wisconsin
Printing Industry of Illinois/Indiana
Association
Printing Industry of Minnesota, Inc.
Printing Industry of the Carolinas, Inc.
Professional Beauty Association

ProsperityAlaska.org
Public Service Research Council
Puget Sound Washington Chapter IEC
Recreation Vehicle Industry Association
Redwood Empire Chapter IEC
Regional Legislative Alliance of Santa
Barbara County (CA)
Restaurant & Hospitality Association of
Indiana
Restaurant Association of Maryland
Restaurant Association of Metropolitan
Washington
Retail Industry Leaders Association
Rhode Island Chapter of ABC
Rhode Island Hospitality & Tourism
Association
Rio Grande Valley Chapter of IEC Inc
Rockwell Collins
Rocky Mountain Chapter of ABC
Rocky Mountain IEC
Rogers-Lowell (AR) Chamber of Commerce
Ruston-Lincoln (LA) Chamber of
Commerce
Sacramento (CA) Metro Chamber of
Commerce
Saginaw Valley Chapter of ABC
San Antonio Chapter IEC
San Clemente Chamber of Commerce
San Diego Chapter of ABC
San Diego North Chamber of Commerce
San Jose Chamber of Commerce
Sierra Nevada Chapter of ABC
Snack Food Association
Society of American Florists
Society of Human Resource Management
South Carolina Trucking Association
South Dakota Retailers Association
South Florida Chapter Inc IEC
South Texas Chapter of ABC
Southeast Missouri IEC
Southeast Pennsylvania Chapter of ABC
Southeast Texas Chapter of ABC
Southeastern Michigan Chapter of ABC
Southern Arizona IEC
Southern Building Material Association
Southern California Chapter of ABC

Southern California IEC
Southern Colorado Chapter IEC
Southern Hills Business Association
Southern Indiana Chapter-Evansville IEC
Southern New Mexico IEC
SPI: The Plastics Industry Trade Association
St. Mary's County (MD) Chamber of
Commerce
Staten Island (NY) Chamber of Commerce
Steel Manufacturers Association
Stuart-Martin County (FL) Chamber of
Commerce
Taxpayers League of Minnesota
Tennessee Hospital Association
Tennessee Hotel & Lodging Association
Tennessee Restaurant Association
Texas Coastal Bend Chapter of ABC
Texas Gulf Coast Chapter IEC
Texas Gulf Coast Chapter of the Associated
Builders & Contractors
Truck Renting & Leasing Association
Truckload Carriers Association
Tucson (AZ) Metropolitan Chamber of
Commerce
U.S. Apple Association
U.S. Chamber of Commerce
U.S. Hispanic Chamber of Commerce
U.S. Human Resources and Ethics Services
United Chambers of Commerce-SFV &
Region
United Fresh Produce Association
United Motorcoach Association
Utah Chapter of ABC
Utah Hotel & Lodging Association
Texoma IEC
Textile Care Allied Trades Association
Textile Rental Services Association of
America
The Real Estate Roundtable
Tooling & Manufacturing Association
Treasure State IEC
Tri-State IEC
Utah IEC
Texas Hotel & Lodging Association
Texas Panhandle IEC
Texas Hospital Association

Texas Restaurant Association
Texas State IEC
Texas Warehouse Association
Utah Restaurant Association
Ventura Chapter IEC
Vermont Hospitality Council
Virginia Chamber of Commerce
Virginia Chapter of ABC
Virginia Hospitality & Travel Association
Virginia Manufacturers Association
Virginia Petroleum Convenience & Grocery
Association
Virginia Trucking Association
Visalia Chamber of Commerce
Washington IEC
Washington Restaurant Association
Washington State Hotel & Lodging
Association
WECA IEC
West Chamber Serving Jefferson County
(CO)
West Suburban Chamber of Commerce &
Industry
West Tennessee Chapter of ABC
West Texas IEC

West Virginia Chamber of Commerce
West Virginia Chapter of ABC West
Virginia Hospitality & Travel
Association
West Virginia Oil Marketers &
Grocers Association
Western Carolina Industries
Western CO Associated Builders &
Contractors
Western Colorado IEC
Western Growers Association
Western Michigan Chapter of ABC
Western Pennsylvania Chapter of
ABC Western Reserve Chapter IEC
Western Washington Chapter of ABC
Wholesale Florist & Florist Supplier
Association
Wichita Chapter IEC Wisconsin
Chapter of ABC Wisconsin Innkeepers
Association Wisconsin Manufacturers
& Commerce
Association
Wisconsin Motor Carriers Association
Wisconsin Restaurant Association
Wyoming Lodging & Restaurant
Association

CC: U.S. House of Representatives
U.S. Senate