

American Federation of Labor and Congress of Industrial Organizations



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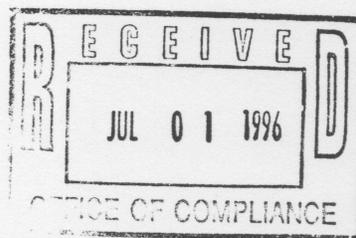
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July 1, 1996

Mr. Glen D. Nager, Chair
Board of Directors
Office of Compliance
Room LA 200
John Adams Building
110 Second Street, S.E.
Washington, D.C. 20450



Dear Mr. Nager:

I am writing on behalf of the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO) in response to the two Notices of Proposed Rulemaking issued by the Board of Directors setting forth proposed regulations under § 220(d) and § 220(e) of the Congressional Accountability Act. On April 11, 1996, the AFL-CIO submitted more detailed comments in response to the Advance Notice of Proposed Rulemaking issued by the Board.

As we noted there, the largest question facing the Board under § 220(e) is whether to grant a blanket exclusion to certain categories of "employing offices." For the reasons set forth in our comments, and as developed more fully in the Board's Notice of Proposed Rulemaking, we concur with the Board's decision not to grant any such blanket exemption.

We likewise support the Board's decision essentially to adopt the Federal Labor Relations Authority's regulations and apply those regulations to the legislative branch employees covered by the CAA. And without necessarily endorsing each and every modification of those regulations proposed by the Board, we submit that the statutory interests would be served best by promulgating the proposed regulations as expeditiously as possible so that legislative branch employees can begin to exercise the rights promised to them by § 220 of the Act.

Sincerely,

Jonathan P. Hiatt
General Counsel

JPH/LEG/hmp