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March 26, 2008

Mr. Lester A. Heltzer
Office of the Executive Secretary
National Labor Relations Board
1099 14th Street, NW., Room 11600
Washington, DC 20570-0001

Mr. Heltzer:

This correspondence is in response to the National Labor Relations Board (NLRB) request for public comment on the proposed rule change to permit an employer and labor organization to jointly file a petition for a prompt and expeditious certification election, absent a showing of interest. Catholic Healthcare Partners (CHP)¹ supports this proposed rule change.

A few months ago, CHP used a similar process to resolve a question of representation at an acute care facility, the Community Regional Medical Center, located in Lorain, Ohio. On November 29, 2007, CHP filed five RM petitions covering unrepresented employees relying upon written demands for recognition from the Service Employees International Union (SEIU) and its claim that a majority of employees would like to be represented. On the date the petitions were filed, CHP and SEIU also signed Consent Election Agreements stipulating to election details such as an election date 14 days from the filing date, polling locations, a

¹ CHP is one the largest not-for-profit, faith-based providers of health care in the United States and the 6th largest employer in the State of Ohio. Its mission is to extend the healing ministry of Jesus by improving the health of our communities with emphasis on people who are poor and under-served. Over 37,000 dedicated and highly trained CHP associates bring that mission to life everyday, working in over 100 facilities (including 34 hospitals), located in the states of Ohio, Tennessee, Kentucky, Pennsylvania and Indiana.

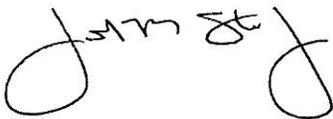


description of the bargaining units, and the payroll period eligibility date. CHP also provided SEIU with the full names and addresses of employees eligible to vote in the election.

On December 13, 2007, approximately 900 CHP employees had an opportunity to decide if they wanted to join SEIU using the expedited process. Two units decided to join (Nonprofessional and Skilled Maintenance) while three units decided not to join (Professional, Technical and Business Clerical). After the election, CHP and SEIU retained the services of a third-party consultant, The Institute for Employee Choice, to conduct focus groups and evaluate the election process. Virtually every manager and employee interviewed supported the election process, including the short timeframe between the petition filing and the election.

Relying on these recent experiences, CHP supports the proposed rule change to establish a voluntary option for employers and labor organizations to jointly file certification petitions for expeditious NLRB elections. In certain situations, employers and labor organizations may decide that the tension associated with a traditional card signing campaign and the legal delay caused by unresolved pre-election issues are not in the interests of the employer, labor organization, or employees. Although jointly filed petitions are not appropriate for all representation questions, CHP fully supports the option for employers and labor organizations to enter into such arrangements voluntarily.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John M. Starcher". The signature is written in a cursive, somewhat stylized font.

John M. Starcher
Senior Vice President, Human Resources