

I am a Registered Nurse at Queen of the Valley Medical Center in Napa, Ca (Queen of the Valley) and I participated in two elections conducted by the National Labor Relations Board at my hospital. I also helped with a union organizing campaign and election at St. Jude Medical Center in Fullerton, CA (St. Jude). Queen of the Valley and St. Jude are both part of the St. Joseph Health System. The first election at my hospital was conducted on the Board's older election rules. The second election at my hospital and the election I assisted on at St. Jude were conducted under the Board's new election rules. Having experience with the election process under both the old rules and the new rules, I believe the Board should maintain and continue to enforce its current rules and procedures.

The first election I participated in at Queen of the Valley was held about 45 days after a petition was filed. This time lag between petition and election was unnecessarily long and resulted in a needless escalation of tensions between employees and management that ultimately led to a challenged outcome of election. Management used the extended timeline to their advantage. With 24/7 access to the facility, management targeted nurses with anti-union messages around the clock that left many confused and intimidated. Nurses were unsatisfied with the process and results and eventually a second election was held under the new Board rules, the outcome of which was not challenged. If the first election at Queen of the Valley had been conducted under the new Board rules, it's possible we could have avoided a second election, which would have saved everyone, including management, a lot of time, resources, and grief.

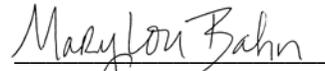
The election I assisted on at St. Jude was also conducted under the new Board election rules. The process was again much more clear and concise than my experience under the old rules. The time from petition to election at St. Jude was shorter than at my facility under the old rules (about one month compared to 45 days), though during that time management still had every opportunity to reach each nurse with their message. St. Jude utilized a robust security presence at all the hospital exits and parking lots and management communicated with nurses frequently during their shifts, discouraging unionization. The environment was intimidating for many RNs and, had the time to election been longer, the intimidation likely would have been worse.

Another helpful part of the new rules is the provision of phone numbers and email contacts to be provided to the Union. As mentioned above, Queen of the Valley and St. Jude engaged in intense union-busting tactics that included extensive contact with nurses at their facilities before the election. Simultaneously, the hospitals, particularly St. Jude, made it difficult for union staff and union-supporting nurses, especially those from other St. Joseph Health System hospitals, to make contact with nurses at their facilities. Therefore, having contact information for nurses was often the only way the union and union-supporting RNs were able to talk with nurses one-on-one, answer questions, alleviate fears, and educate nurses about the process. It would not have been fair for nurses if the union did not have this contact information. Employees need to have information from both sides in order to make a decision about what will be best for them.

For these reasons, I think the new rules should absolutely stay in place. Shorter time frames to election are better for workers. The new rules help to level the playing field because otherwise management has the upper-hand and can be oppressive to employees. Rights of

workers should be respected first and foremost. Corporations should not have a right to harass workers who want to join a union. At my hospital, the Union is there to protect nurses, and nurses are there to protect patients. That being the case, it is very important that the Board refrain from any further undermining of employee rights to a fair, informed, and timely election.

Thank you for your consideration,

  
Mary Lou Bahn