



March 7, 2011

The Honorable Wilma Liebman, Chair
National Labor Relations Board
1099 14th Street NW
Washington, DC 20570-0001

Via electronic submission

Dear Chair Liebman,

I am writing as the volunteer chairperson of the Georgia Chamber of Commerce to express my strong opposition to the decisions under consideration in the *Specialty Healthcare and Rehabilitation Center of Mobile* case pending before the National Labor Relations Board (NLRB).

On behalf of our thousands of members across the state of Georgia, representing more than one million employees, I strongly encourage the Board to maintain precedent in determining bargaining unit rules for purposes of union elections. I am not aware of any circumstances in this case that would justify the Board's departure from making these types of determinations on a case-by-case basis applying a "community-of-interests" test. The Board should not consider applying this ruling beyond the facts of this case and end up creating rules applicable to all employees nationwide covered by the National Labor Relations Act.

Should such a change be implemented, it could lead to a proliferation of multiple micro-units throughout the workplace which could pose substantial difficulties for both employers and employees. As a small business owner, I can't imagine having to spend time dealing with multiple unionization efforts which would be allowed under this potential ruling.

Employers in Georgia and the rest of the country continue to struggle to work our way out of economic recession. Both employers and employees need to focus their energies on economic and job growth opportunities, rather than dealing with the potential gerrymandering of bargaining units in an effort to promote unionization in the workplace.

I urge you to take all appropriate action to prevent the Board from issuing a decision that would significantly change the rules for determining whether proposed bargaining units are appropriate.

Thank you for your consideration of my views.

Sincerely,

Doug Carter
2011 Chair

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2011 Chair

Chris Clark
President & CEO

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