



UNITED STATES GOVERNMENT
NATIONAL LABOR RELATIONS BOARD
1015 Half St., S.E.
Washington, D.C. 20570-0001

November 14, 2017

Ms. Mary L. Johnson
General Counsel
National Mediation Board
1301 K Street, NW -- Suite 250 East
Washington, DC 20005-7011

Re: PrimeFlight Aviation Services, Inc.
Case 29-RC-198504

Dear Ms. Johnson:

The above-captioned representation proceeding is currently pending before the National Labor Relations Board. A question has been presented whether the operations of the Employer arguably fall within the jurisdiction of the Railway Labor Act rather than the National Labor Relations Act.

The Board respectfully requests that you review the record and provide the NLRB with your opinion as to whether the National Mediation Board has jurisdiction over the Employer. The issues are set forth in the attached Decision and Direction of Election and in the Employer's Request for Review submitted to the Office of Representation Appeals, and the attached transcripts and exhibits from the hearings held in the NLRB representation proceedings in this case. Should you require further information about the record in this representation proceeding, please contact Ms. Kathy Drew King, Regional Director, Region 29, at (718) 330-7713.

The Board also requests that, in rendering your opinion, you take note of the D.C. Circuit Court's opinion in *ABM Onsite Services – West, Inc. v. NLRB*, 849 F.3d 1137 (D.C. Cir. 2017). (Following the court's remand, the Board is also seeking your opinion on jurisdiction in that case.)

The Board would appreciate your opinion in a form appropriate for citation or quotation in any decision the NLRB may subsequently issue. It is respectfully requested that the enclosed formal documents be returned with your opinion.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. Leverone".

Susan Leverone
Associate Solicitor

Enclosures

cc: Ms. Rothschild
Ms. Kathy Drew King

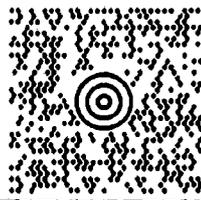
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WASHINGTON DC 20003-3654

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SHIP TO:

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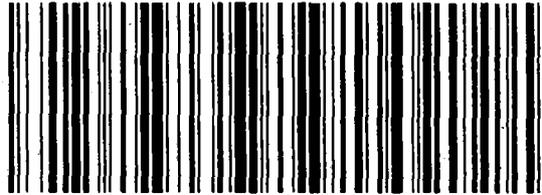


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