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UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD

VERIZON WIRELESS, )  
 )  
 Respondent. )  
 )  
 and )  
 )  
 COMMUNICATIONS WORKERS OF AMERICA,)  
 AFL-CIO, )  
 )  
 Charging Party. )  
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Case 02-CA-157403

VERIZON NEW YORK INC., EMPIRE CITY SUBWAY COMPANY (LIMITED), VERIZON AVENUE CORP., VERIZON ADVANCED DATA INC., VERIZON CORPORATE SERVICES CORP., VERIZON NEW ENGLAND INC., VERIZON SERVICES CORP. AND VERIZON NEW JERSEY INC.,

Respondents

and

COMMUNICATIONS WORKERS OF AMERICA (“CWA”),

Charging Party.

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Case 02-CA-156761

VERIZON PENNSYLVANIA INC., VERIZON SERVICES CORP. AND VERIZON CORPORATE SERVICES CORP.,

Respondents

and

COMMUNICATIONS WORKERS OF AMERICA, DISTRICT 2-13, AFL-CIO, CLC,

Charging Party.

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Case 04-CA-156043

VERIZON WASHINGTON, D.C. INC., VERIZON MARYLAND INC., VERIZON VIRGINIA INC., VERIZON SERVICES CORP., VERIZON ADVANCED DATA INC., VERIZON SOUTH INC. (VIRGINIA), VERIZON CORPORATE SERVICES CORP. AND VERIZON DELAWARE INC.,

Respondents

and

COMMUNICATIONS WORKERS OF AMERICA, DISTRICT 2-13, AFL-CIO CLC,

Charging Party.

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Case 05-CA-156053

VERIZON CALIFORNIA, INC. AND )  
 VERIZON FEDERAL INC., VERIZON )  
 FLORIDA INC., VERIZON NORTH LLC, )  
 VERIZON SOUTHWEST INC., VERIZON )  
 CONNECTED SOLUTIONS INC., VERIZON )  
 SELECT SERVICES INC. AND MCI )  
 INTERNATIONAL, INC., )  
 Respondents )  
 And )  
 COMMUNICATIONS WORKERS OF )  
 AMERICA AFL-CIO, DISTRICT 9, )  
 Charging Party )

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Case 31-CA-161472

**RESPONSE TO NOTICE TO SHOW CAUSE**

The Charging Parties respond to the Notice to Show Cause as follows:

1. The more delay, the more chance that after the November election, the incoming President Joseph Biden will appoint, with the approval of a Democratic Senate, members of the Board who understand, respect and appreciate workers’ rights.
2. The Notice to Show Cause is premature because the parties including the wrongdoer have 28 days to file a Motion for Reconsideration. The Notice to Show Cause should be rescinded and if appropriate issued after any such motion is resolved.
3. With respect to the Notice to Show Cause, the matter should be remanded to an Administrative Law Judge to allow the Charging Parties to put on evidence with respect to the disputed rule. They intend to prove that as a business necessity and approved by the employer:
  - a. Verizon allows employees to engage in solicitation within the meaning of Section 1.6.
  - b. Verizon allows non-employees to engage in solicitation and distribution of literature on company promises routinely, with the approval of the employer.
  - c. Employees engage in distribution and solicitation which is broader than the reference to “authorized communications relating to benefits or services made available to employees by the company...”
  - d. Verizon routinely approves political activities in the workplace.

- e. Verizon allows mass distributions using the company's email, instant messaging, internet or internet and similar electronic communication media.
- f. Verizon routinely allows and encourages communications directed to groups of employees inside the company on behalf of outside organizations.

4. Indeed these activities are core functions of some Verizon employees governed by these rules. There can be no business reason for a rule which is intentionally, repeatedly and openly ignored as part of the employer's business.

5. Charging Parties intend to prove that all these rules have no business purpose, since activity in violation of these rules is inherent in the normal functioning of the business and the employees who work for Verizon.

For these reasons, the matter should be remanded to an Administrative Law Judge to take evidence with respect to these and other issues including remedies. The Board's issuance of a Notice to Show Cause is improper and premature. Because the Board allows 28 days to file a motion for reconsideration the requirement that a response be filed before the end of that period violates the Board's rules. The Board should rescind the Notice to Show Cause and reissue it if appropriate after any motions for reconsideration are ruled upon.

Dated: July 8, 2020

Organize and Resist,

AMY YOUNG

LAURENCE GOODMAN  
WILLIG, WILLIAMS & DAVIDSON

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By:           /s/ David A. Rosenfeld            
          DAVID A. ROSENFELD  
          Attorneys for the Charging Parties

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## PROOF OF SERVICE

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On July 8, 2020, served the following documents in the manner described below:

### RESPONSE TO NOTICE TO SHOW CAUSE

- (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from [rfortier-bourne@unioncounsel.net](mailto:rfortier-bourne@unioncounsel.net) to the email addresses set forth below.

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 8, 2020, at Alameda, California.

/s/ Rhonda Fortier-Bourne  
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Rhonda Fortier-Bourne