

Matis, Jennifer A.

From: Flynn, Terence F.
Sent: Wednesday, November 30, 2011 8:08 AM
To: 'peter@schaumber.com'
Subject: Final Rule Resolution thoughts.doc
Attachments: Final Rule Resolution thoughts.doc
Thoughts from counsel on the resolution

3/7/2012

Section 102.67

permitted.

Also,

pre-election.

Clearly,

period.

HOWEVER . . .

10

day.)

Grounds for opposing the proposed change:

In

he case.

The Board's

Speeding

informed.

It

them.

8(c)

The

Possible alternatives:

(1) Delete

hanges.

(2) Instead

recently:

Section

an

[REDACTED] 11302.1.

This [REDACTED] altogether.

Frank Comments

For [REDACTED] mment.

Resolution Paragraph 1a. [REDACTED] representation."

As to [REDACTED]

Examples [REDACTED] outcome.

My [REDACTED] possible

to

status.

As

compromise.

Resolution Paragraph 1b. This

re.

In mos

rare.

I hope that the above comments are useful. If you have any questions or need anything further, please let me know. Thanks.

Doug Name Comments

Discussion of Proposed Rule Revisions e and f.

e. Amend R&R Section 102.65 to clarify the standard for seeking special permission to appeal to the Board.

This amendment

[REDACTED] tion review.

This

[REDACTED] parties.

[The

[REDACTED] resources.]

f. Amend R&R Sections 102.62(b) and 102.69 to make Board review of a regional director's or judge's disposition of post-election disputes discretionary after both stipulated and directed elections.

Under

[REDACTED] automatic.

Section

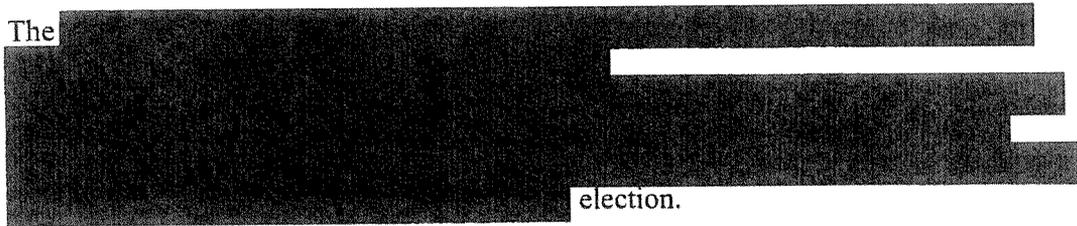
[REDACTED] elections.

Discussion

Under

[REDACTED] review.

The



election.