



April 9, 2020

Chairman Colleen Duffy Kiko
Attn: Emily Sloop, Chief
Case Intake and Publication
Federal Labor Relations Authority
Docket Room, Suite 200
1400 K Street NW
Washington, DC 20424-0001

Re: Comments in Response to the Federal Labor Relations Authority's Proposed Rule Titled, "Miscellaneous and General Requirements," 85 FR 15742, 5 CFR 2429 (March 19, 2020)

Dear Chairman Kiko:

The Center for Worker Freedom (CWF) is a nonprofit, educational organization that is dedicated to warning the public about the causes and consequences of unionization. CWF supports freedom of association and believes all workers should have the right to decide for themselves whether or not they would like to belong to a labor organization.

The Center for Worker Freedom strongly supports the Federal Labor Relations Authority's proposed rule on union dues deduction.

In 2018, the Supreme Court decided the landmark *Janus v. AFSCME* case. The Supreme Court ruled that forcing state government workers who chose not to join a union to pay agency fees to unions violated their First Amendment rights. This case overturned a 1977 Supreme Court decision, *Abood v. Detroit Board of Education*.

In proposing this rule, the Federal Labor Relations Authority is adjusting its rules to ensure consistency with the *Janus* decision. This proposed rule gives federal government employees more freedom, as the *Janus* decision did for state government workers, and allows them to revoke their authorization of union dues at any time after a year.

Given that the Federal Labor Relations Authority's proposed rule restores the First Amendment rights of federal government workers, the Center for Worker Freedom strongly supports this rule.

Sincerely,

Olivia Grady
Senior Fellow