

July 15, 2004

Mr. Lester A. Heltzer
Executive Secretary
National Labor Relations Board
1099 14th Street NW
Washington, DC 21570

Dear Mr. Heltzer:

This letter is in response to pending board actions with respect to Neutrality and voluntary recognition and its impact on fair process for employees. Lear Corporation, a major automotive supplier, has an excellent relationship with its unions, in particular its two major unions UNITE and UAW which collectively represent over 50 plants in the U.S., each with individual contracts. Lear's stated philosophy is the "Unions are Partners in Growth". In keeping with the philosophy Lear has practices neutrality and card check recognition with respect to the Union as a matter of policy for over 10 years. This has resulted in adding more than 35 plants to Union membership rolls without a problem or complaint from employees. This policy has allowed voluntary choice without causing disruptive behavior in our plants. The bargaining units have ratified every first contract without a disruption. It is our belief that effective collective bargaining on first contracts need to have a period for the parties to work and allow the bargaining unit time to understand the roles of both the Union and Management and how each works, in a cooperative and progressive environment. It would be counterproductive to have a union certified and then not allow time for the parties to work together to achieve a successful contract. Elimination of the "window period" would only add an unrealistic expectation without adequate time for the process to work. The recognition period allows this maturing process to occur naturally in the collective bargaining process. Lear is a living example of how the process should and does work effectively.

For the above reason, Lear respectfully request the board consider keeping the current policy with regard to neutrality and recognition bar.

Sincerely,

John M. Fowler
Vice President, Employee Relations