



December 16, 2019

Roxanne Rothschild
Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, DC 20570

Re: Comments in Response to National Labor Relations Board's Proposed Rule Titled "Jurisdiction---Nonemployee Status of University and College Students Working in Connection with their Studies," RIN 3142-AA15, 29 CFR Part 103 (September 23, 2019)

Dear Ms. Rothschild:

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 National Labor Relations Board's proposed rule on student research and teaching assistants, which would establish that they are not "employees" under the National Labor Relations Act.

By establishing that they are not "employees" under the Act, the rule would protect the First Amendment rights of these students. Unfortunately, many workers in the private sector have lost their First Amendment rights and are forced to pay dues to unions that they do not support. If this proposed rule is not finalized, some students would also lose their First Amendment rights and have to support a union that they don't support.

In addition, this rule would protect students from disruptions in their studies. Currently, graduate students at Harvard University are on strike because the United Automobile Workers (UAW) union (which purportedly represents them) wants to divert attention from its corruption scandal. This strike is not helpful to the students and is disrupting their studies during a critical time: the exam period. These strikes would unfortunately become more frequent if this rule is not finalized.

Because this proposed rule on students would protect the First Amendment rights of these students, the Center for Worker Freedom strongly supports the National Labor Relations Board's proposed rule.

Sincerely,

Olivia Grady
Senior Fellow