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August 11, 2017

The Honorable Acosta
Secretary
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

RIN 1245-AA07

Dear Secretary Acosta,

On behalf of the National Waste & Recycling Association (NWRA), I am writing in response to the Notice of Proposed Rulemaking (Docket RIN 1245-AA07) that proposes to rescind the regulations commonly referred to as "the persuader rule." Thank you for the opportunity to comment.

NWRA is a national trade association of more than 680 members representing private-sector waste and recycling companies, manufacturers of waste-related equipment, service suppliers, and consultants to the industry. Our members provide collection and recycling services in all 50 states and the District of Columbia. NWRA was incorporated in 1963.

We strongly encourage the Department of Labor to rescind the rule in its entirety. Promulgated on March 24, 2016, the rule interferes with employers' ability to engage in positive employee relations and legally communicate with employees about the pros and cons of unionization. The rule also makes it very difficult for attorneys to maintain client confidentiality by requiring disclosure of various communications to clients regarding how to lawfully communicate with employees prior to a union representation election.

We strongly encourage the Department to rescind the March 24, 2016 persuader regulation in its entirety.

Very truly yours,

A handwritten signature in dark ink, appearing to read "K. J. Kraushaar", is written over a light blue rectangular background.

Kevin J. Kraushaar, Esq.
Vice President and General Counsel