

**1. Further explanation of Local 117's ability to effectively represent drivers' interests, regardless of platform(s), given Local 117's positions on past for-hire transportation issues in Seattle, including the March 2014 lawsuit against Uber cited on page 2**

In 2014, the Western Washington Taxicab Operators Association ("WWTCOA"), an independent organization, sued Uber on behalf of its members to protect the livelihood of Taxicab operators. This lawsuit was initiated and pursued by the WWTCOA, and not International Brotherhood of Teamsters Local Union No. 117 ("Local 117" or "Union"), and was designed to enhance the interests of all independent contractor for-hire drivers in the City of Seattle and to ensure that Uber's compliance with City law. Thereafter in 2014, the City of Seattle created a single regulatory framework to level the playing field for for-hire drivers. Since then, Local 117 has in no way interfered with the City's regulatory framework, and it has continued to unite workers in the industry for better working conditions regardless of their dispatch platform.

Local 117 will be able to effectively represent for-hire drivers' interests, as it has done since 2012. The fact that for-hire drivers may compete with taxicab drivers is not an impediment to the Union's ability to effectively represent these workers. Local 117 has years of experience representing workers whose employers compete within the same industry. By way of example, Local 117 already represents workers from: Coca-Cola and Pepsi; Safeway and Fred Meyer; Republic Services and Waste Management. Additionally, some of the Union's strongest contracts are in the grocery industry where it represents workers at several companies that directly compete with each other. In each of these cases, members have chosen to stand together despite competition between their employers, and Local 117 has been there to support them. When more workers in an industry are represented by a union, it drives up industry standards, improving wages and working conditions for all workers in that industry. In that sense, representing employees of competing companies *enhances* rather than detracts from the Union's ability to effectively represent employees' interests. For further information please see section 5 of the Teamsters Local 117 application.

**2. Further explanation of Local 117's ability to ensure that members of the organization can truly participate in democratic control of the organization given the International Union's ability to control execution of a collective bargaining agreement negotiated by a Local.**

Local 117 is a labor organization that represents approximately 16,000 men and women working at over 200 employers across Washington State. Through organizing efforts and zealous representation of its members, Local 117 seeks to improve the wages and working conditions of employees throughout Washington State. The active participation of Local 117 members is critical in helping to achieve industry-leading contracts that ensure better pay, improved working conditions, dignity, and respect on the job. Without the active participation of members, there would be no union.

Local 117 is a democratic institution governed by the terms of the Labor Management Reporting and Disclosure Act. Under the terms of that Act, all officers must be elected no less frequently than every three years in free and fair elections the validity of which is guaranteed by the United State Department of Labor. Every member of Local 117 is entitled to one vote in the election for Union officers, and they have the right to run for any officer position with the Union. Under Section 16 of Local 117's Bylaws, union members have the explicit right to vote, nominate, or otherwise support the candidate of their

choice when electing the officers of the Union. Thus, any member seeking to participate in leadership of the organization has the right to do so.

Local 117 is chartered by the International Brotherhood of Teamsters (“IBT”). The IBT has 1.4 million members across the country. The IBT has an established internal structure that helps to sustain and coordinate the efforts of locals across the country. At the center of the IBT’s relationship with its locals is a commitment to the autonomy, integrity, and dignity of members. The Preamble to the IBT’s Constitution provides in relevant part:

*In entering this new relationship, the local unions preserved their autonomy and identity and structured an International based upon the concept that the heart of the local is the membership and that the core of the International must be its locals. As the local unions must reflect the interests of their members, so too must the International Union be responsive to the needs of the locals which brought it into existence. The local unions and the International recognize that the interests of the membership are at the core of their relationship. The local unions and the International commit to serve the interests of the membership by maintaining a Union that is strong, democratic, and free of corruption.*

....

*The welfare of our members is interrelated with the ability of our fellow workers in the global marketplace to demand and obtain decent wages and working conditions from their employers. We pledge to support the legitimate efforts of our brother and sister workers to achieve the right to organize and obtain fair terms of employment.*

*We reaffirm our belief that only through a strong democratically accountable Union can workers be protected and prosper and only with the allegiance of its members and the mutual support of united labor organizations can the Union survive.*

Local 117 members can participate in the IBT by running for a position with the IBT’s Executive Board, or by running for a position as an IBT delegate for their local. Local Unions are apportioned a number of delegates based on the number of members they represent. In this way, the organization mirrors the American democracy. Given the IBT’s express commitment to the democratic participation of members, and the organizations internal structure which ensures that local members have a voice in development of the organization, there can be no doubt that the IBT and Local 117 will be able participate in the control of the organization and in the advancement of worker’s rights.

**3. Explanation of the number of bargaining units that have sought to decertify the Teamsters, specifically Local 117 (page 4 cites 30 bargaining units since 1993; what percentage of all bargaining units represented by Local 117 is this?)**

Even if it were true that 30 Local 117 bargaining units have sought to decertify Local 117 since 1993, of which Uber provided no evidence, this would represent an exceedingly small portion of total bargaining units. Thirty units seeking to decertify over a 24-year period works out to an average of 1.25 units per

year or approximately 0.0052% units per year. And, the fact that some workers at some Local 117 bargaining units might have wanted to decertify Local 117 tells us nothing about the overall level of worker satisfaction with Local 117; any worker can file a decertification petition, but that does not mean that anything close to a majority of the workers at those units actually wanted, or voted, to decertify Local 117.

In any event, right now, there are approximately 240 current Local 117 collective bargaining agreements covering the same number of bargaining units. If all 30 decertification petitions alleged to have been filed over the past 24 years had happened in this year alone, and if each of those petitions had resulted in Local 117 being voted out by the members – neither of which scenario is even remotely the case -- that number would still only represent 12% of current bargaining units.

Moreover, and finally, the fact that some groups of Teamsters may have chosen at some times in the past to cease being Teamsters means only that Local 117 is, as explained above, a democratic organization that groups of workers may collectively either choose, or not choose, to belong to. It in no way means that Local 117 is unable or unwilling to properly perform the role of exclusive bargaining representative for those workers who may choose to have it play that role for them.

**4. Please also clarify whether the Western Washington Taxicab Operators Association is a labor union in the traditional sense (i.e., whether taxicab drivers who belong to WWTOA are unionized).**

WWTCOA is not a labor union, it is a membership association. Drivers can choose to be members of WWTCOA in the same way they could choose to be members of the YMCA, NRA, or any other membership association. Teamsters Local 117 and WWTCOA are separate legal entities. WWTCOA is a not for profit membership association registered as a 501(c)(3) organization, and the Local 117 is a labor union registered as a nonprofit under state law and a 501(c)(5) organization under federal law. Being a Teamster member is not a prerequisite for being a WWTCOA member, nor is being a WWTCOA member a prerequisite for being a member of Local 117.

The question is irrelevant to the issue being considered by the City of Seattle, because it is Local 117, not WWTCOA, that is seeking to be approved as a potential bargaining representative for for-hire drivers, whether or not WWTCOA would properly receive such status is not relevant to the issue under consideration.

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