



NCCA

NORWEGIAN CABIN CREW ASSOCIATION

P.O. BOX 21761

FT. LAUDERDALE, FL 33335

October 18, 2016

VIA EMAIL

Norwegian Air Shuttle, ASA
Jan Dahm-Simonsen, CHRO
Oksenøyveien 3
1330 Fornebu
Norway

Dear Mr. Dahm-Simonsen,

This is in response to your letter emailed to me on October 12, 2016, regarding the start of negotiations between the NCCA and Norwegian Air Shuttle, ASA. On August 11, 2016, the National Mediation Board certified NCCA as the representative of “the craft or class of flight attendants, employees of Norwegian Air Shuttle ASA, its successors and assigns.” 43 NMB No. 35. Under the Railway Labor Act, Norwegian has the affirmative duty to “treat with” the NCCA, 45 U.S.C. § 152, Ninth, including the obligation to confer with NCCA regarding a collective bargaining agreement. 45 U.S.C. § 156.

I wrote to you on September 28, 2016, to arrange a time and place to meet for this purpose. Your response states that OSM Aviation, Inc. will serve as Norwegian’s representative at negotiations, with “sole discretion in negotiating ... and in setting the terms and conditions of ... employment.” While Norwegian does have the right to designate its bargaining representatives, that designation does not relieve Norwegian of its statutory obligation to bargain with the certified representative of its employees. I trust that your designation of OSM as Norwegian’s representative is made in good faith, and that the parties will be able to promptly begin serious negotiations toward an agreement which covers and is binding on NCCA, NAS and OSM as the joint employer of Norwegian’s flight attendants.

In the spirit of good faith, and pursuant to your suggestion, by copy of this letter and the attached copy of my September 28, 2016 letter to you, I am notifying OSM to request proposed dates within the next 30 days to begin negotiations under the Railway Labor Act. I look forward to hearing from you or your representative concerning our meeting.

Sincerely,

A handwritten signature in cursive script that reads "Valentin Lorian".

Valentin Lorian

President, Norwegian Cabin Crew Association (NCCA)

copy sent to: OSM Aviation
National Mediation Board