

INTERNATIONAL BROTHERHOOD OF TEAMSTERS

JAMES P. HOFFA
General President

25 Louisiana Avenue, NW
Washington, DC 20001



KEN HALL
General Secretary-Treasurer

202.624.6800
www.teamster.org

October 26, 2016

Mary Johnson, Esq.
General Counsel
National Mediation Board
1301 K Street, NW
Suite 250
Washington, DC 20036

Dear Ms. Johnson:

Enclosed please find the International Brotherhood of Teamsters Airline Division's request that the National Mediation Board initiate an investigation to determine whether ABX Air, Inc. ("ABX") and Air Transport International ("ATI"), both wholly-owned subsidiaries of Air Transport Services Group, Inc., constitute a single transportation system for the purposes of the representation of the crewmembers (pilots and flight engineers), hereafter referred to as "pilots," in the employ of ABX and ATI. In support of our request, attached please find a completed NMB Form 1 and a letter brief/position paper in support of our position that ABX and ATI do indeed constitute a single transportation system for purpose of the representation of the pilots in the employ of ABX and ATI.

Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "David Bourne", with a long horizontal flourish extending to the right.

David Bourne
Director, Airline Division
International Brotherhood of Teamsters

cc: Dan Wells, Teamsters Local Union 1224
Rich Ziebarth
Lynne Nowell, Teamsters Local Union 1224
Edward Gleason, Esq.



Application for Investigation of Representation Dispute

Date: October 26, 2016

TO THE NATIONAL MEDIATION BOARD, Washington, D. C. 20005: A dispute has arisen among the employees of:

Name of Carrier:	ABX Air, Inc. & ATI, Inc.	Address:	145 Hunter Drive
Contact:	See Attachment A	City, State, Zip Code:	Wilmington, Ohio 75063
Telephone Number:	See Attachment A	Fax Number:	
E-Mail	See Attachment A		

as to who is the representative of these employees designated and authorized in accordance with the requirements of the Railway Labor Act. The undersigned, one of the parties to the dispute, hereby requests the National Mediation Board to investigate this dispute, and to certify the name or names of the individuals or organizations authorized to represent the employees involved in accordance with Section 2, Ninth, of the Act.

PARTIES TO DISPUTE

Petitioning organization or representative:	International Brotherhood of Teamsters, Airline Division	
Organization holding existing agreement, if any:	See Attachment A	Date:
Other organization or representatives involved in dispute:	Air Line Pilots Association, International	

CRAFT OR CLASS of Employees Involved – (If more than one craft or class, use a separate application)

Craft or Class	Number of Employees
Crewmembers (Pilots and Flight Engineers) in the employ of ABX Air, Inc. and ATI, Inc.	Approx. 400

Federal Law prohibits knowingly and willfully making materially false, fictitious, or fraudulent statements or representations in any matter within the jurisdiction of the U.S. Government. 18 U.S.C. § 1001. This includes the information provided on this application as well as the accompanying showing of interest.

EVIDENCE OF REPRESENTATION – this application is supported by:

<input checked="" type="checkbox"/>	All affected Crewmembers (Pilots and Flight Engineers) are covered by current CBAs. See Attachment A.
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I declare that the information submitted is true to the best of my knowledge

Name and Signature:	10-26-16	
Title:	Director, Airline Division	
Address:	25 Louisiana Ave., NW,	Telephone: (202) 624-6848
City, State, Zip Code:	Washington, DC 20001	Fax: (202) 624-7494
E-Mail	ibtairline@gmail.com	



Application for Investigation of Representation Dispute

APPLICANT NOTICE OF APPEARANCE

The **International Brotherhood of Teamsters, Airline Division**, hereby enters the following names, addresses, (*Applicant Organization*) phone numbers, fax numbers, and email addresses for the individual(s) designated as the representative(s) of **The International Brotherhood of Teamsters, Airline Division**, in connection with the Application for Investigation (*Applicant Organization*) of Representation Dispute:

Name & Title:	David Bourne, Director, Airline Division	Telephone:	(202)624-6848
Address:	25 Louisiana Avenue, NW.	Fax:	(202)624-7494
City, State, Zip Code	Washington, DC 20001	Email:	lbtairline@gmail.com
		Alternate Telephone:	

Name & Title:	Lynne Nowel, Esq.	Telephone:	(513)850-9146
Address:	2292 West 5 th Street	Fax:	
City, State, Zip Code	Cleveland, OH 44113	Email:	lnowel@hotmail.com
		Alternate Telephone:	

Name & Title:	Edward Gleason, Esq.	Telephone:	(202)800-0090
Address:	910 17 th Street, NW, Suite 800	Fax:	(202)459-9579
City, State, Zip Code	Washington, DC 20036	Email:	egleason@gleasonlawdc.com
		Alternate Telephone:	

Filing Instructions: File this application in duplicate.

Additional Sheets: Use and attach additional sheets as needed.

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control Number. The valid OMB control number for this information collection is 3140-0001. The time required to complete this information collection is estimated to average 15 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.

Application for Investigation of Representation Dispute ATTACHMENT A

Part I: Carriers Involved In Dispute and Contact Information:

ABX Air, Inc.

145 Hunter Drive
Wilmington, Ohio 75063
C/O: John Starkovich, President
937-382-5591 – Telephone
937-366-3234 - Fax
john.starkovich@abx.com

Air Transport International, Inc.

Operations Base Headquarters:

145 Hunter Drive
Wilmington, Ohio 75063
C/O: James O'Grady, President
937-382-5591 – Telephone
937-366-5022 – Fax
Jim.Orgrady@airtransport.cc

Corporate Office:

6012 Campus Circle (W)
Suite 240
Irving, Texas 75063

ABX Air, Inc. and ATI are wholly owned subsidiaries of:

Air Transport Services Group, Inc.

145 Hunter Drive
Wilmington, Ohio 75063
C/O: Joe Hete, President & CEO
937-382-5591 – Telephone
937-382-2452 - Fax
joe.hete.@atsginc.com

PART II: Parties to Dispute:

Petitioning Organization:

International Brotherhood of Teamsters, Airline Division
25 Louisiana Avenue, NW
Washington, DC 20001
C/O: David Bourne, Director
202-624-6800 - Telephone
202-624-7494 - Fax
ibtairline@gmail.com

.... **Part II cont'd**

Other Organization Involved in Dispute:

Air Line Pilots Association, International
1625 Massachusetts Avenue, NW
Suite 800
Washington, DC 20035
C/O: Captain Tim Canoll, President
703-689-2270 – Telephone
Tim.Canoll@alpa.org

PART III: Craft or Class of Employees Involved

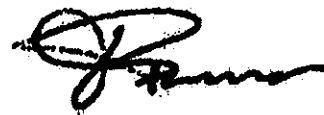
Craft or Class: Crewmembers (Pilots and Flight Engineers) in the employ of ABX Air, Inc. and ATI, Inc.

Number of Employees: Approx. 400

PART IV: Evidence of Representation:

The approximately 250 Crewmembers (Pilots and Flight Engineers) in the employ of ABX Air, Inc. are represented by the International Brotherhood of Teamsters, Airline Division. They are covered under a collective bargaining agreement, the current one of which became amendable on January 1, 2015. A copy of the current collective bargaining agreement is attached hereto as **Exhibit 1**.

The approximately 150 Crewmembers (Pilots and Flight Engineers) in the employ of Air Transport International, Inc. are represented by the Air Line Pilots Association. They are covered under a collective bargaining agreement, the current one of which, on information and belief became amendable on or about May 29, 2014. A copy of the collective bargaining agreement is available from ALPA.



10-26-16