

**Motor & Equipment Manufacturers Association**

1030 15th Street, NW Suite 500 East Washington, DC 20005  
Tel 202.393.6362 Fax 202.737.3742 www.mema.org



May 8, 2019

The Honorable Federica S. Wilson  
Chairwoman  
Subcommittee on Health, Employment, Labor and Pensions  
Committee on Education and Labor  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Tim Walberg  
Ranking Member  
Subcommittee on Health, Employment, Labor and Pensions  
Committee on Education and Labor  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairwoman Wilson and Ranking Member Walberg:

MEMA is the leading trade association representing U.S. motor vehicle parts suppliers. These companies manufacture and remanufacture components, technologies, and systems for use in passenger vehicles and heavy trucks. In total, vehicle parts manufacturers represent the largest sector of manufacturing jobs in the United States, directly employing over 871,000 Americans in all 50 states and generating 2.4 percent of U.S. GDP.

The motor vehicle supplier industry has long had a balanced and productive relationship between employers and employees with respect to labor and workforce rules. However, the Protecting the Right to Organize (PRO) Act (H.R. 2474) would shift that balance, resulting in greater costs imposed on suppliers, impacting their ability to manage their workforce and provide jobs.

MEMA strongly opposes H.R. 2474, which includes many sweeping provisions that will harm employers and their ability to sustain and create jobs. Some of the problematic provisions in the legislation include:

- Removal of a secret ballot for union elections, stripping employees of their rights to vote privately and in secret when choosing whether to unionize.
- Elimination of Right-to-Work provisions across the country, including in states that have passed Right-to-Work laws.
- Interference with attorney-client confidentiality, increasing reporting requirements for employers and their legal counsel retained for labor and workforce issues. This requirement is unnecessary and ignores the long-standing nature of confidentiality between a company and its legal counsel.
- Language codifying the National Labor Relations Board (NLRB) joint employment standard that strips workers of their right to private voting and secret ballots in union elections. This standard maintains that any two (or more) companies are joint employers if the primary employer has "indirect or potential control" of contract employees. This vague and uncertain standard increases employer liability for subcontractors and vendors.

For the reasons outlined above, MEMA urges the Subcommittee not to move forward on this legislation. Instead, MEMA encourages Congress to work with all relevant stakeholders – including employers, unions, and other stakeholders – to implement reforms that protect employee and employer rights while encouraging economic growth.

Thank you for your attention to the concerns raised. If you have questions or need more information, please contact Catherine Boland, vice president, legislative affairs at [cboland@mema.org](mailto:cboland@mema.org).

Sincerely,

A handwritten signature in black ink that reads "Bill Long". The signature is written in a cursive, slightly slanted style.

Bill Long  
President & CEO

