

City, et. Al v. L.306, et. Al, 16 OCB 22 (BOC 1975) [Decision No. 22-75 (Cert.)]

OFFICE OF COLLECTIVE BARGAINING
BOARD OF CERTIFICATION

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In the Matter of

THE CITY OF NEW YORK,

Petitioner

DECISION NO. 22-75

-and-

MUNICIPAL GUILD OF RADIO AND
TELEVISION TECHNICIANS

DOCKET NO. RE-46-74

-and-

DIRECTORS GUILD OF AMERICA, INC.

-and-

LOCAL 306, MOVING PICTURE MACHINE
OPERATORS UNION, IATSE, AFL-CIO

-and-

CITY EMPLOYEES UNION, LOCAL 237,
INTERNATIONAL BROTHERHOOD OF TEAMSTERS,

Respondents

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DISTRICT COUNCIL 37, AFSCME, AFL-CIO,

Petitioner

DOCKET NO. RU-475-74

-and-

THE CITY OF NEW YORK,

Respondent

----- x

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DECISION, ORDER AND DIRECTION OF
ELECTION

On January 20, 1974, certain employees in the titles of Announcer and Senior Announcer filed a petition (RD-1-74) in an effort to decertify their collective bargaining representative, A.F.T.R.A.

On March 29, 1974, the City filed its petition (RE-46-74), opposing the aforementioned decertification petition, and proposing a single consolidated unit of all twenty-seven titles (including Announcer and Senior Announcer) classified in the Radio and TV Occupational Group.

On June 11, 1974, Office of Collective Bargaining staff held a conference, at which the City, the Announcers, and each of the four unions which are currently certified for segments of the City's proposed unit, were represented. Unanimous opposition to the City's unit position was voiced by the union and Announcer representatives.

On July 10, 1974, the Board, found (Decision 29-74) that A.F.T.R.A. had disclaimed interest in functioning as the exclusive bargaining representative of the unit employees in the titles of Announcer and Senior Announcer, terminated A.F.T.R.A.'s certification pursuant to Rule 2.18, and dismissed the decertification petition.

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On October 17, 1974, DC 37 filed its petition (RU-475-74), requesting certification as representative of Announcers and Senior Announcers.

On October 21, the Board consolidated RE-46-74 and RU-475-74 for the purpose of hearing. On December 4, 1974, a hearing was held before W.J. Bernstein, Trial Examiner, at which Local 306 moved to dismiss the City's petition on procedural grounds and DC 37 moved to be certified pursuant to its petition. On December 23, 1974, the Board denied the motions, indicated an opinion would follow and directed the hearing to continue. The hearing was concluded on December 30, 1974.

BACKGROUND

Titles¹ in the Radio and TV Occupational Group are currently certified as follows:

<u>UNION AND CERTIFICATION NO.</u>	<u>UNIT TITLES</u>	<u>NO. OF EMPLOYEES</u>	<u>CONTRACT TERM</u>
Munic. Guild of Radio & TV Tech. CWR-45-67	Radio Operator Senior Radio Operator	55	7/1/72 to 6/30/75

Announcer and Senior Announcer (21 employees), Production Coordinator (2 employees), and Principal Program Manager (vacant), are Occupational Group titles which are currently uncertified.

<u>UNION AND CERTIFICATION NO.</u>	<u>UNIT TITLES</u>	<u>NO. OF EMPLOYEES</u>	<u>CONTRACT TERM</u>
Munic. Guild of Radio & TV Tech. 44-69	Supvr. of Radio Operation Chief Supvr. of Radio Oprns. Supvr. of TV Oprns. Chief Supvr. of TV Operations Radio Opr., Grade 3 Film Manager Program Manager Asst. Program Manager Musical Supvr.	24	7/1/72 to 6/30/75
Directors Guild 7 N.Y.C.D.L. #87	Television Dir. Prog. Prod. Asst. (TV)	10	1/1/71 to 12/31/73
Local 306, Motion Pict. Mach. Oprs. CWR-30-67 (as amended by Dec. 89-70) ²	Asst. TV Cameraman TV Cameraman TV Lighting Tech. Film Editor	10	7/1/71 to 6/30/74
Local 237, I.B.T. 71-68 (as amended by Dec. 46-71)	Prog. Prod. Asst. (Radio) Audience Prom. Asst. Continuity Writer Script Writer Asst. Musical Supvr. Broadcast Traffic Asst.	8	1/1/72 to 12/31/74

The certified unit also includes 48 employees in the titles of Audio-Visual Aid Technician and Motion Picture Operator. These titles are not classified in the Radio and TV Occupational Group and are excluded from the City's proposed, consolidated unit.

Approximately 130 employees in the 27 titles in the Radio and TV Occupational Group are primarily concerned with the operation of the Municipal Broadcasting System (WNYC).³ The Radio and TV Occupational Group consists of three sub-groups: Programming, which encompasses the titles whose primary function is "artistic;" Licensed, which encompasses titles whose primary function is "technical" and which require FCC licenses; and Operational, which encompasses titles which do not require licensing although their primary function is also "technical."

Non-supervisory employees in titles in the Programming sub-group are in three units, whereas non-supervisory employees in titles in the Licensed and Operational sub-groups are each in a single unit. Supervisory employees in titles in all three sub-groups are in one supervisory unit. There are also two uncertified titles in the Programming sub-group which have not been previously certified.

The three non-supervisory units within the Programming sub-group are:

About 12 of the 62 employees serving in the titles of Radio Operator, Film Editor, and Supervisor of Radio Operations are employed in the Transportation Administration, the Parks Departmentt and the Department of Social Services.

1. IBT's unit (of 8 employees) which consists of Script Writers, Continuity Writers, and Program Production Assistants (Radio) who, respectively, write script, write continuity (news bulletins and spot announcements), and convert script into radio productions. The unit also includes Audience Promotion Assistants, who prepare publicity and promotional releases; Broadcast Traffic Assistants, who prepare schedules for T.V. Directors, Announcers, and Program Production Assistants; and Assistant Musical Supervisors, who assist in preparing musical programs.

2. The Directors Guild's unit (of 10 employees) which consists of the titles of T.V. Director and Program Production Assistant (TV) who, respectively, direct the production of T.V. programs and serve as floor managers by relaying T.V. Director's cues to program participants.

3. The unit (for which DC 37 is petitioning) which consists of 21 employees (in the titles of Announcer and Senior Announcer) who make announcements and assist the Continuity Writer and the Production Coordinator for T.V. The Senior Announcer also edits news bulletins.

The two uncertified titles in this sub-group are Production Coordinator for T.V. and Principal Program Manager. The two Production Coordinator employees supervise, assign and schedule the work of Operational

personnel and coordinate the work of the Operational and Programming sub-groups. This title was established (in 1972) after all pertinent Radio and T.V. Occupational Group certifications and amendments had been issued. A petition for this title has never been filed. A job description for Principal Program Manager has never been written. This title was originally petitioned for by the Municipal Guild in RU-87-69, but the Guild later stipulated to a unit excluding this title.

The Municipal Guild represents the only unit in the Licensed sub-group. The unit consists of 55 non-supervisory employees in the titles of Radio Operator and Senior Radio Operator.

The Radio Operator assembles, tests, and operates all broadcast transmitters, and the Senior Radio Operator operates master control systems and coordinates the simultaneous operation of such systems. Thirty five of the 45 employees in the title of Radio Operator are employed in WNYC, one in the Parks Department and nine in the Transportation Administration.

Local 306 represents the unit in the Occupational sub-group. The unit consists of 8 non-supervisory employees⁴ in the titles of Assistant T.V. Cameraman,

⁴ All except one Film Editor (employed by the Social Services Department) work at WNYC.

T.V. Cameraman, T.V. Lighting Technician and Film Editor. These titles, respectively, assist in the operation of or operate T.V. cameras, set up and operate lighting equipment, and recommend and perform cuts for films and tapes. This unit also includes approximately 48 employees in the title of Audio Visual Aid Technician and the vacant title of Motion Picture Operator which are classified in the Photographic occupational Group and are not included in the City's petition. Audio Visual Aid Technicians transport and operate 16 mm silent and sound motion picture equipment, slide film strips, opaque projectors and public address systems. The presently vacant title of Motion Picture Operator is responsible for the operation of 35 mm motion picture projectors. Audio Visual Aid Technicians⁵ are not employed at WNYC. They serve in the Department of Health, the Board of Higher Education, the Health and Hospitals Corporation and the Queens Borough Public Library.

The single supervisory unit consists of approximately 24 employees⁶ in 9 titles which are drawn from the three sub-groups. The unit includes a single

Senior Visual Aid Technicians are also certified to Local 306 and are the only employees in a supervisory unit pursuant to CWR-3-67.

All except one Supervisor of Radio Operations (employed by the Transportation Administration) work at WNYC.

Chief Supervisor of Radio Operations⁷ who plans and coordinates the technical division of a broadcasting system; two Chief Supervisors of T.V. operations, each responsible for the technical division of a T.V. Operation; twelve Supervisors of Radio Operations who plan and direct the operation of all equipment assigned to a broadcasting transmission system; and two Supervisors of T.V. Operations who plan and direct the operation of all equipment assigned to a T.V. broadcasting station. This unit also includes one Film Manager, who plans and directs the production of films and is responsible for scripts and direction of T.V. news; four Program Managers, who plan and direct radio and T.V. programs by supervising the work of all Programming personnel and by coordinating the program schedule with Operational and Licensed employees;⁸ the presently vacant Assistant Program Manager title, which is responsible for the Planning and supervision of the production, publicity, and promotion of T.V. and radio programs; and one Musical Supervisor, who manages and coordinates the musical department and presents special musical programs.

There is also, a single Radio Operator Grade III who is equated to this title.

A more detailed analysis of the titles of Chief Supervisor of T.V. Operations, Chief Supervisor of Radio Operations, and Program Manager can be found in that section of this Decision dealing with the supervisory and managerial issue.

POSITIONS OF THE PARTIES

The City maintains that an overall unit is appropriate, alleging that there is a community of interest among the pertinent employees who work together to produce a broadcast product, and that the proposed consolidation would make for efficient operation of the public service and sound labor relations by combining fragmented and small units. The City takes no position as to the union allegation that Chief Supervisors of Radio Operations, Chief Supervisors of T.V. Operations, and Program Managers are managerial employees, or as to the unions' proposal made during the hearing regarding voluntary joint bargaining.

DC 37, Local 306, Municipal Guild, and Directors Guild maintain that disparate communities of interest among the existing units justify the continued separate existence of the units.

The Directors Guild and Local 306 maintain that, in practice, employees in their existing units are bargained for together with similar employees at the Board of Education radio station (WNYE), for whom, they allege, they are separately recognized by the Board of Education. Hence, they contend the City's proposed consolidation would

fragment this joint bargaining. In addition, Local 306 argues that, since its existing unit also encompasses titles in the Photographic Occupational Group which are not petitioned for by the City, its unit would be further fragmented.

DC 37, Local 306, Municipal Guild and Directors Guild maintain that the history of collective bargaining also warrants continuation of the separate units.

Local 306 and DC 37 argue that the City's proposed consolidation is improper in that it would combine supervisors with the employees they supervise. DC 37 further asserts that should the Board consolidate the six existing units, Chief Supervisors of Radio Operations, Chief Supervisors of TV Operations and Program Managers should be excluded therefrom as managerial employees.

Furthermore, DC 37, Directors Guild and Local 306 assert that, if the Board maintains the separate units of the three unions and if it certifies DC-37 pursuant to its petition, these three unions would voluntarily engage in joint bargaining with the City.

Local 237, IBT, in addition to stating its opposition to the City's petition at the conference of June 11, 1974, has informally reaffirmed its opposition.

DISCUSSION

Although it is clear from the foregoing background information that there are certain differences in job duties and skills among the various titles in the Radio and T.V. Occupational Group units, it is also clear that employees in all pertinent titles are engaged in communications, and the preponderant number of employees are employed at WNYC where they work as a team in a common broadcasting effort. Moreover, this community of interest among employees in the current units is not only demonstrated by a common job purpose, i.e., to prepare and broadcast radio and T.V. programs, but is evidenced by a degree of common promotional opportunities. While it is true that there is no one supervisory title to which employees in the non-supervisory units can promote, it is equally true that employees in at least one of the titles in all but one of the existing units are eligible to promote into at least one of the titles in the common supervisory unit.

Directors Guild and Local 306 maintain that the requested consolidation will fragment the joint bargaining relationships between their units involved herein and units consisting of the same titles at the Board of Education.⁹

However, only Local 306 is recognized by the Board of Education.

While it may be true with regard to Local 306 that the Board of Education has agreed to apply the results of City bargaining to comparable employees at the Board of Education, we cannot deal with this contention. Our jurisdiction is limited, and this Board has no authority over employees in the Board of Education.

Local 306 also alleges that the proposed consolidated unit will fragment its existing unit by not including the vacant title of Motion Picture Operator and the Audio Visual Aid Technician title which are classified in the Photographic Occupational Group and not in the Radio and T.V. Occupational Group. Although Local 306's assertion is correct, the Board notes that at a former point in time, Audio Visual Aid Technicians were certified separately from the other titles now in their unit.¹⁰

DC 37, Local 306, Municipal Guild, and Directors Guild maintain that the history of collective bargaining justifies the continued existence of the separate units. In this regard, the Board notes that the Municipal Guild, in practice, has bargained for the two units it represents

Motion Picture Operator, the other title which would continue in the same unit as the Technicians, is currently vacant and has apparently been unfilled since about 1962.

as if they were a single entity.¹¹ Moreover, these union, (except for the Municipal Guild) expressed, at the hearing a willingness to voluntarily engage in joint bargaining, with the City, if the Board should maintain separate units.

SUPERVISORY AND MANAGERIAL ISSUES

DC 37 and Local 306 object to the inclusion of the supervisors in the same unit with the employees they direct. However, such "mixed" units are clearly proper under the NYCCBL, unless an objection to the creation of the mixed unit is presented by the supervisors concerned or by the public employer. We have no objections. While the Municipal Guild has objected to the City's proposed consolidation, it has not objected to the combination of the supervisory and non-supervisory units it represents. Moreover, as previously noted, the Guild has already bargained with the City as if both its units had already been combined into one mixed unit.

DC 37 maintains that the Chief Supervisor of Radio Operations, the two Chief Supervisors of T.V. Operations and the four Program Managers are managerial employees and, therefore, should be excluded from the City's proposed consolidate unit. Despite the fact that it has filed petitions alleging

See LRO #73/79, effective 7/1/72 to 6/30/75, which covers all the titles in the Guild's two units without reference to their separate certifications.

that thousands of City employees are managerial, the City, as previously noted makes no such contention in regard to the Chief Supervisors and Program Managers. These employees are currently included in the certified, supervisory unit. Their pay scale is between \$16,400 and \$120,700 per annum.

The allegedly managerial employees are all located in WNYC. WNYC is headed by the Director, who is assisted by an Executive Officer. WNYC is organized into four divisions: F.M. Radio, A.M. Radio, T.V., and Engineering. The latter is headed by an Administrative Engineer,¹² and the remaining three by Program Managers. These four employees are subordinate to, and report to, the Executive Officer and, through him, to the Director. The Chief Supervisors of T.V. and the Chief Supervisor of Radio are, in turn, subordinate to the Administrative Engineer. Although, in some instances, there is a level of supervision directly beneath the employees in these disputed titles, they also function as the first supervisory level for many of the approximately 125 employees at WNYC.

The duties of the disputed titles, as described in job specifications and Notices of Promotions, are: Chief Supervisors¹³ "under general supervision, with

A petition (RU-440-74) for certification of this title is presently pending before the Board.

Chief Supervisor of Radio Operations and Chief Supervisor of T.V. Operations are basically identical. All data is for Chief Supervisor of Radio Operations.

considerable latitude for the exercise of initiative and independent judgment, supervise the operation and maintenance of the entire technical division of a broadcasting or two-way radio communications system in accordance with the rules and regulations of the [FCC]" "Prepares technical and procedural manuals governing the operation of the system;" and "Makes estimates of, and may write specifications for, equipment and supplies for the division." To qualify for these positions, the Chief Supervisors must have "Possession of a [license issued by the FCC] and 7 years experience as a radio operator, at least three years of which shall have been in a responsible supervisory capacity...."

The Program Manager, "under general direction, directs and supervises the production, scheduling, presentation, publicity and promotion of all radio or T.V., programs...." They "formulate policies for programming in conformance with federal, state and local laws" and "negotiate with public officials and private agencies with respect to program resources, and department programming needs." To qualify for the position, the Program Manager must have a B.A. and five years of experience.

Labaton, the Director of WNYC, a witness for the City, testified that each Program Manager is responsible for a radio

or T.V. station at WNYC. Labaton further testified that the budget is prepared by the Director and the Executive Officer; however, the Chief Supervisors and Program Managers will attend meetings to discuss the budget. Labaton also testified that Chief Supervisors and Program Managers will attend weekly staff meetings where policy changes may be discussed, but that, since all supervisors often suggest policy changes, such changes will also be discussed at specially called meetings which will be attended only by the "head" of the affected operation, who may not be a Chief Supervisor or a Program Manager.¹⁴

In light of the foregoing, despite the high positions in the hierarchy of WNYC of Program Managers and Chief Supervisors, we find that DC 37 has not substantiated its claimed manageriality.¹⁵

Moreover, we find that all titles in the Radio and T.V. Occupational group constitute a single unit appropriate for collective bargaining.¹⁶ For this reason, we also find that the unit of Announcers and Senior Announcers sought by DC 37 is inappropriate.

Little testimony was adduced as to the managerial status of these employees because DC 37 first raised the managerial status of these three titles in its closing statement at the hearing.

Since we have found that these titles are not managerial, we do not reach the issue of whether a union has standing to raise the alleged managerial status of employees in a representation proceeding.

No party has objected to the inclusion of Principal Program Manager but, as previously noted, it is a vacant title with no existing job specification. We shall, therefore, exclude this title from the unit we have found appropriate (Dec. 57-72).

We note that the consolidation we have found appropriate herein is consistent with our policy of reducing the number of small, fragmented units in order to promote sound labor relations and efficient operation of the public service.¹⁷

The Board once again expresses its belief that any differences in the job duties and responsibilities of titles included in the overall unit may be adequately dealt with in collective negotiations and reflected in any bargaining agreement reached.

We now turn to the two motions which the Board previously denied.

MOTION OF LOCAL 306

Local 306 challenged the procedural propriety of the City's petition for the following reasons: 1) Only unions have the standing to seek consolidations. 2) A petition for consolidation may only be filed in response to a union petition seeking certification in what the City asserts is an appropriate unit. 3) The city's petition fails to allege that a question or controversy concerning representation exists or that the City entertains a good faith doubt concerning the continued majority status of a certified union pursuant to Rule 2.4.

The Board in Decision 44-68 held that reducing the number of bargaining units "is essential to the effectuation of the purposes and policies of the Statute and the proper functioning of the collective bargaining process, and should be applied wherever it is possible to do so without severe dislocations or inequities."

4) Rule 2.7, "Contract bar," renders the City's petition untimely and the petition does not allege unusual or extraordinary circumstances within the meaning of Rule 2.18. And 5) the City is barred or estopped from seeking consolidation because it had agreed in the past that each of the present units was proper.¹⁸

A request for consolidation of units, whether raised by petition or in response to a representation petition relating to a component of a proposed consolidated unit, constitutes a question or controversy as to appropriate unit. The City of New York, as employer, clearly has standing to raise such issues, including the right to initiate proceedings by petition (Rule 2.2 and Rule 2.4).

A finding of appropriate unit is a finding not that the unit certified is the only appropriate unit but that it is an appropriate unit under circumstances then prevailing. The Board has the continuing power to review and restructure bargaining units with the purpose of providing more appropriate units and of promoting a more rational bargaining structure for the City of New York (Dec. 68-74). For such a process to exist, interested parties must be free, as the Board is, to examine and revise unit positions previously taken.

In support of its motion, Local 306 also argues the proposed consolidation would fragment its existing unit. This argument has previously been dealt with in this Decision.

In response to the contention that the City's petition is untimely pursuant to Rule 2.7, the Board finds it unnecessary to address this issue since it must make a determination as to the appropriate unit in any event. It is unchallenged that the Announcers filed a timely petition for decertification and that, later, DC 37 filed a timely petition to represent that group. No one questions the fact that the City has the right to take a position on these union petitions and in fact, it has done so, contending that the requested unit is inappropriate and that the appropriate unit is the one discussed herein as the proposed consolidated unit. Thus, the Board, of necessity, is faced with the issue of the appropriate unit, whether or not the City petition is deemed timely, and, therefore, the Board need not determine the issue of timeliness, but should, instead, proceed (as it has previously done herein) to the unit issue.

THE MOTION OF DC 37

DC 37 moved to be certified pursuant to its petition. The Board at the time of the hearing had not decided the appropriateness of the unit which DC 37 was petitioning to represent. Therefore, the decision as to whether DC 37 should be certified had to be deferred until such time as the Board decided the appropriate unit issue.

BALLOT STATUS

Directors Guild, Municipal Guild, Local 306, and Local 237, IBT are each certified by the Board to represent certain employees within the unit we have found appropriate herein and DC 37 has filed a showing of interest of approximately 18% in such unit. Therefore, pursuant to Rule 2.12¹⁹ the above named unions are eligible to appear on the ballot. However, since they preferred units different from the one found appropriate herein, we shall grant them 10 days from date of receipt of this Decision to notify the Board if they wish to appear on the ballot.

ORDER AND DIRECTION OF
ELECTION

Pursuant to the powers vested in the Board of Certification by the City of New York Collective Bargaining Law, it is hereby

ORDERED, that the petition of District Council 37 be, and the same hereby is denied; and it is further

ORDERED, that the petition of the City of New York be, and the same hereby is granted to the extent consistent with our findings herein; and it is further

§2.12 Elections-Participation; Eligibility, in pertinent part, reads: "a. If the Board determines, as part of its investigation to conduct an election, it shall determine who may participate in the election and appear on the ballot, the form of the ballot, the employees eligible to vote in the election, and the rules governing the election. An intervening public employee organization, other than the certified employee organization, shall not be entitled to appear on the ballot except upon a showing of interest, satisfactory to the Board, of at least ten (10) per cent of the employees in the unit found to be appropriate."

ORDERED, that Certifications CWR-45-67, No. 44-69, 7 NYCDL 87, CWR-30-67 (as amended by Decision No. 89-70) and No. 71-68 (as amended by Decision No. 46-71) be, and the same hereby are, combined and consolidated, so as to constitute one bargaining unit consisting of the following titles:

Radio Operator	Television Cameraman
Senior Radio operator	Television Lighting Technician
Supvsr. of Radio Operations	Film Editor
Chief Supvsr. of Radio Oper.	Program Production Asst. (Radio)
Supvsr. of TV Operations	Audience Promotion Assistant
Chief Supvsr. of TV Operations	Continuity Writer
Radio Opr., Gr. 3	Script Writer
Film Manager	Asst. Musical Supervisor
Program Manager	Broadcast Traffic Assistant
Asst. Program Manager	Announcer
Musical Supervisor	Senior Announcer
Television Director	Production Coordinator (Television)
Program Production Asst.(TV)	
Asst. TV Cameraman	

And it is,

DIRECTED, that as part of the investigation authorized by the Board, an election by secret ballot shall be conducted under the supervision of the Board of Certification or its agents, at a time, place, and during hours to be fixed by the Board among the employees found herein to constitute an appropriate unit who were employed during the payroll period immediately preceding the date of this Direction of Election (other than those who have voluntarily quit or who have been discharged for cause before the date of election), to determine whether they desire to be represented for the purpose of collective

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bargaining; and it is further

DIRECTED, that the said employee organizations may have their names placed on the ballot in the aforementioned election by filing with the Board, within ten (10) days after service of this Direction of Election, a written request that their names be placed on the said ballot.

DATED: New York, N.Y.
 May 5, 1975

ARVID ANDERSON
CHAIRMAN

ERIC J. SCHMERTZ
MEMBER

WALTER L. EISENBERG
MEMBER