

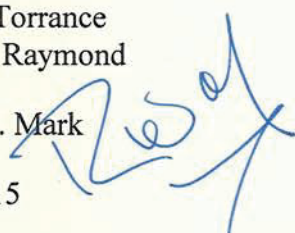
# **EXHIBIT F**

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RICHARD W. MARK  
Election Supervisor

MEMORANDUM

TO Ellen London  
Benjamin Torrance  
Bradley T. Raymond

FROM Richard W. Mark 

DATE June 4, 2015

RE Comments on Proposed *Rules for the 2015-2016  
IBT International Union Delegate and Officer Election*

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The Office of the Election Supervisor (“OES”) received five comment submissions on the proposed *Rules for the 2015-2016 IBT International Union Delegate and Officer Election* (the “*Proposed 2016 Rules*”). The submissions (in order of receipt) were from Larry Parker, a member of IBT Local 986; Nancy Shaw, General Counsel of IBT Local 959; Matthew Fitch of Merriman River Associates, an election services vendor; David Suetholz on behalf of announced candidate for International Office Fred Zuckerman; and Barbara Harvey on behalf of Independent Committee Teamsters for a Democratic Union. David Hoffa, on behalf of the Hoffa-Hall 2016 campaign, submitted a statement that the campaign was not submitting comments on the *Proposed 2016 Rules*.<sup>1</sup>

This memorandum summarizes the comments received and makes recommendations as to their disposition. OES recommends that that the parties should present the *Proposed 2016 Rules* to the United States District Court for the Southern District of New York for approval without substantial change (specific, limited corrections are noted below). Our analysis notes that certain suggestions not recommended for adoption will remain under consideration for incorporation into Advisories or Supplemental Rules that will be issued in the course of conducting the election, or as administrative actions that OES may implement. The comments are discussed in the order received.

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<sup>1</sup> The comments submitted are attached to this memorandum. Only the *Proposed 2016 Rules*-related comments submitted by Parker, Shaw, Fitch, and Hoffa are provided on the attachment relating to the email submissions; certain personal information contained in the emails and matters irrelevant to the comment process are not reproduced. The letters submitted by Suetholz and Harvey are attached in full.

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## I. Process

On February 27, 2015, the United States District Court for the Southern District of New York approved a “Final Agreement and Order” (the “Final Order”) that includes provisions addressed to conducting and supervising all future IBT International Union Officer and Delegate Elections. See *United States v. International Brotherhood of Teamsters*, 88 Civ. 4486 (LAP) D.I. 4414, Order Approving Final Order (D.I. 4409-1) (S.D.N.Y. Feb. 17, 2015). “[E]very IBT International Officer election occurring after the date of this Final Order shall be conducted pursuant to rules and procedures designed to ensure a fair, free, and democratic election (the ‘Election Rules’).” Final Order, ¶ 16. For the 2016 International Officer Election, the Final Order requires that

the Election Rules adopted by the GEB shall not differ in any material way from the rules that governed the 2011 International Union and Delegate Election (the “2011 Election Rules”), as supplemented and amended, which were agreed upon by the Government and the IBT and approved by the Court. During the Transition Period, the Independent Election Supervisor may propose material amendments or changes to the 2011 Election Rules, but such material amendments or changes may be made only with the written consent of the Government and the IBT. In addition, during the Transition Period, the Independent Election Supervisor may, after consulting with all interested parties, including the IBT, make non-material changes to the 2011 Rules as necessary to tailor the rules to the new election cycle.

*Id.* ¶ 19. The 2016 Election Agreement further provides that the Government and the IBT must jointly agree upon the 2016 Election Rules “following comments by IBT members and any interested parties.” *United States v. International Brotherhood of Teamsters*, 88 Civ. 4486 (LAP) D.I. 4416, ¶ 4 (S.D.N.Y. Feb. 26, 2015). IBT members and other interested parties were to receive notice “and a period of at least thirty (30) days to comment upon the 2016 Election Rules.” *Id.*

By March 18, 2015, the Government and the IBT had agreed on *Proposed 2016 Rules* to be circulated for comment. OES prepared a notice inviting comment on the *Proposed 2016 Rules* and providing an overview of changes from the *2011 Rules* reflected in the *Proposed 2016 Rules*.<sup>2</sup> The comment period was set to close on May 22, 2015.

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<sup>2</sup>

A copy of the OES notice is attached to this memorandum.

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OES disseminated the notice and the *Proposed 2016 Rules* through several channels:

- On March 30, 2015 the *Proposed 2016 Rules* and notice were posted for public viewing on [www.ibtvote.org](http://www.ibtvote.org).
- On April 9, 2015, the *Proposed 2016 Rules* and notice were mailed to every Local Union, System Federation, and General Committee of Adjustment; every joint council; Teamsters Canada; members of the IBT General Executive Board; known Independent Committees; declared candidates for International officer; and certain attorneys who had represented International officer candidates in the past. OES provided copies of the *Proposed 2016 Rules* to three members who specifically requested the document. OES distributed more than 600 printed copies of the *Proposed 2016 Rules* and notice.
- The *Proposed 2016 Rules* and notice, and the open comment period, were described in the Election Supervisor's Report published in the April/May 2015 issue of *Teamster* magazine, which was scheduled for delivery to members by mid-April. The description included instructions on how to view the materials at [www.ibtvote.org](http://www.ibtvote.org).

These distributions allowed interested parties more than thirty days to submit comments ahead of the May 22, 2015 deadline. Consistent with past practice in International Officer Elections, the *Proposed 2016 Rules* were deemed effective as of May 1, 2015.

## II. Comments Received

### A. Larry Parker – Comment Regarding Delegate Compensation

Larry Parker, a rank-and-file member of IBT Local Union 986, submitted a comment addressed to the issue of delegate compensation. Mr. Parker noted that local union employees who attend the convention receive their regular pay and benefits. When he served as a delegate in 2001 and 2006, he received the equivalent of his regular hourly wage as a construction driver but not a certain \$2.70/hr. supplement, \$2.00 of which went towards a "Vacation-Holiday fund" paid out on December 1, with the remaining 70¢ being supplemental dues. Mr. Parker requests "a new rule that says something to the effect that rank and file delegates and alternate delegates, in addition to the past and existing compensation and perks during the convention week, should also have paid on their behalf 40 hours of pension contributions, 40 hours of health

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insurance contributions, and 40 hours of any other contributions that the rank and file members normally get from their employer when working as a member of their Local.”

OES submits that the proposed rule should not be added. The *Proposed 2016 Rules* cover the subject of compensation of convention delegates and further details will be provided in a pre-Convention expense *Advisory*.

The *Proposed 2016 Rules* require each Local Union to send all of its elected delegates to the International Convention and to pay the expenses for those delegates (or make arrangements with other subordinate bodies for payment). *Proposed 2016 Rules*, Art. III, § 3(a). Local Unions are not required to send alternate delegates to the International Convention, or pay the expenses for alternates, unless the Local Union said in its Local Union Plan that it would do so, *id.*, § 3(b), and a Local Union cannot pay expenses for any other member or guest, unless it first pays expenses of all alternates. *Id.* § 3(c).

The 2011 OES *Advisory Regarding Payment of Expenses for Convention Delegates and Alternate Delegates* (“2011 Expense Advisory”) stated that “Local Unions are obligated to cover four categories of Convention expenses: (A) travel expenses to and from Las Vegas and local transportation costs while in Las Vegas during the week of the convention; (B) per diem; (C) hotel costs; and (D) wages or salary.” *Id.* at 3.<sup>3</sup>

Regarding wages and salary, “Local Unions have paid their delegates the equivalent of wages for time spent at the IBT International Convention . . . .” *2011 Expense Advisory* at 5. All delegates and alternates receiving a salary “must be paid their regular salary for one week” and are not required to use vacation time for Convention attendance. Regarding Mr. Parker’s specific proposal, the *Advisory* provided that

Delegates and alternates who are paid on an hourly basis must be paid their straight time hourly wages for forty hours, excluding overtime, mileage, or other premiums, which will be deemed to cover the period of time spent at the Convention.

*Id.* Treating Convention attendance as “straight time” compensation provides a clear standard for wage reimbursement. A situation involving a specific employer’s compensation scheme such as that raised by Mr. Parker could be resolved through the protest process, where the question presented would be whether the supplemental sum was part of “straight time” within the meaning of the *Advisory*. Given the great variety of contracts covering IBT members, it would be impractical to write a full catalog of terms covering different wage components into the rules.

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<sup>3</sup> OES will issue a similar *Advisory* before the 29<sup>th</sup> International Convention.

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Contribution to health and welfare funds is also a matter that would be addressed in the protest process. It may be that a delegate or alternate delegate is not deprived of such benefits by taking a one week break from employer compensation if the individual is otherwise employed and has sufficient wages to trigger the benefits contribution for the month. In such cases, there would be no lost health and welfare contribution, and no need to determine a contribution amount specific to convention week to achieve equal treatment between rank-and-file delegates and union-employee delegates. When this issue arose in the past and rank-and-file members may have lost a benefit contribution, the local union voluntarily resolved the benefits question. *See Hasegawa*, 2001 EAD 505 (Oct. 15, 2001).

**B. Nancy Shaw – Comments on Date Discrepancies Between Certain Rules and the Timetable of Events**

Nancy Shaw, General Counsel of IBT Local Union 959 submitted comments noting that certain specific rules and the Timetable of Events had different dates or deadlines for the same matters. Two of the comments should be resolved by providing one set of dates in both portions of the *Final Rules*. The 2016 winter nomination period will be stated as January 3, 2016 to March 10, 2016 in both the Timetable of Events and in Art. II, § 5. The 2016 winter-spring election period will be stated as February 22, 2016 to April 30, 2016 in both the Timetable of Events and in Art. II, § 7.

The *Proposed 2016 Rules* require Local Unions to submit an original of each local union publication distributed to its membership after January 1, 2014 as part of the Local Union Delegate Election Plan. Art. II, § 4(b)(13). The IBT and every subordinate body (including Local Unions) are also required submit to OES, by September 30, 2015, an original of each publication distributed to members after January 4, 2015, and requires regular submission of publications as issued after October 1, 2015. Art. VII, § 8(d). These sections deliberately have different coverage (time period and entities) relating to OES oversight of compliance with the restrictions on use of union resources in the election, and OES recommends that the years not be reconciled (although a change from “January 4” to “January 1” should be made to be clear that publications from the start of the year should be provided). Local Unions will not be required to duplicate submissions made as part of the Local Union Delegate Election Plan.

Ms. Shaw also suggested issuance of standardized “Information for Candidates” and “Information for Union Employees.” OES believes that the *Proposed 2016 Rules*, supplemented with *Advisories*, provide that guidance. For example, the *Advisory on Campaign Contributions Expenditures and Disclosure*, posted to the OES website on May 1, 2015, provides specific guidance on matters specific to finance, but necessarily touches on other issues such as use

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of union resources. If there are specific subjects that Ms. Shaw (or any member) would like OES to consider for an advisory, OES will take that under consideration.

**C. Matthew Fitch – Comments on Election Procedures**

Matthew Fitch of Merriman River Associates, an election services vendor that has provided services to OES in the past, offered two questions and two comments.

Mr. Fitch questioned why the *Proposed 2016 Rules* allow ballots to be printed as soon as 15 days after nominations but require that ballots not be mailed until 30 days after nomination. *See Proposed 2016 Rules*, Art. II, §§ 7(a) and 10(g). Mr. Fitch notes that shortening the time period for mailing would allow earlier resolution of delegate elections.

The IBT Constitution provides that, for local union officer elections “The election shall be held at such place or places and at such time, **not earlier than thirty (30) days after the nominations meeting.**” Art. XXII, § 4(b) (emphasis added). This provides for a minimum 30-day campaign period. In a mail ballot election, the Department of Labor considers the ballot mailing date to be the date of election. *See U.S. Department of Labor, Conducting Local Union Officer Elections, A Guide for Election Officials*, at 4 (Election Planner). The 30-day period between nominations and ballot mailing in the *Proposed 2016 Rules* complies with the IBT Constitution and the Department of Labor guidelines.

Mr. Fitch inquired how the *Proposed 2016 Rules* provision at Art. II, § 2 allowing for “internet or other electronic voting” where “allowed by law” will be applied.

The electronic methods identified are not presently approved by the Department of Labor. Unless and until federal law allows such methods, they will not be used. This provision is inserted in the *Proposed 2016 Rules* to allow for flexibility should federal law approve such voting methods in the future.

Mr. Fitch noted that past OES guidance required ballots to be received at the post office by 9:00 a.m. on the date of the count. He suggests setting a time of 11:00 a.m. or Noon to capture ballots that might arrive at the post office on the count date.

The 9:00 a.m. pickup is usually set so that a Local Union’s delegate election ballot count can commence early and be completed in one day. Members have sufficient notice of the election schedule, from the Local Union Delegate Election Plan through the Notice of Election, of the time for returning ballots and most are returned early in the balloting period. A few ballots even arrive after the ballot count date, so the necessary strict cutoff means that some ballots will inevitably not be eligible for counting. Ultimately, however, the final ballot pickup will be a matter



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for each Local Union to set as part of its election plan. Whatever is set, members will receive notice of the cutoff and be able to plan for timely return of their ballots.

Mr. Fitch noted that Local Unions using business reply mail should consider not holding ballot counts on a Monday because cutbacks in the U.S. Postal Service means that in some areas business reply mail received on a Friday may not be processed until the following Tuesday.

OES does not believe that the *Rules* should categorically prohibit ballot counts on Mondays. A Local Union may have good reasons for such a schedule, and local postal service adequate service to support that choice. OES will take the status of mail service into consideration, however, when reviewing Local Union Election Plans, and will encourage Local Unions to ask their local post office about the level of service. The post office's timely processing of returned mail will be a consideration in approving the proposed schedule for balloting, including the selection of the count date.

**D. David Suetholz on Behalf of Announced Candidate for International Office  
Fred Zuckerman – Convention Procedure and Candidate Forum**

Mr. Suetholz requests that the bold text, below, be added to Art. III, § 5(c) of the *Proposed 2016 Rules* governing nominations at the International Convention:

(c) The Order of floor nominations of candidates for the same position shall be determined by a lot drawing conducted by the Election Supervisor. No candidate shall make or, second his/her own nomination. Candidates shall be limited to a single nominator and a single seconder. The Election Supervisor shall determine the amount of time to be allocated for nominating and seconding speeches for candidates for each position. A member nominating a candidate for International office, or seconding the nomination of a candidate for International office, may state that the candidate is being nominated, or the candidate's nomination is being seconded, as a member of a slate and further may identify such slate by name. **A member nominating a candidate for International office, or seconding a nomination of a candidate for International office may appeal to the Election Supervisor or his designee who shall maintain order on the convention floor to allow the nomination speech to be heard.**

The Election Supervisor presides over the floor nominations at the International Convention and nominators can already appeal to the Chair to maintain order during the proceedings. Section XII(A) of the *Supplemental Rules* for the 28<sup>th</sup> International Convention gave the Election

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Supervisor “authority to take all necessary actions in supervising the floor and secret ballot nominations” and the *Proposed 2016 Rules* provide that *Supplemental Rules* for the 29<sup>th</sup> International Convention will be issued in April 2016, well in advance of the actual convention. A change in the *Proposed 2016 Rules* is therefore not necessary to empower the Election Supervisor to maintain order and OES recommends that the proposed change not be adopted.

Nominations are a partisan affair and stir up candidate supporters in the convention delegate body. No one expects library silence during nominations. At the 2011 International Convention, however, there were nominations where, despite appeals to the Chair for order and the Chair demanding order under the authority of the *Supplemental Rules*, delegates opposed to the speaker sought to shout down the nominations. *See, e.g.*, 28<sup>th</sup> International Convention Transcript, Second Day Morning Session at 5-6; (Hoffa delegates attempt to shout down Zuckerman nomination of Mike Philbeck); Third Day Morning Session at 10 (Hoffa delegates attempt to shout down Zuckerman nomination of James Anderson); Fourth Day Morning Session at 5-6 (Hoffa delegates attempt to shout down Tim Sylvester nomination of Sandy Pope); *see also* [https://www.youtube.com/watch?v=NUcX06mGH\\_g](https://www.youtube.com/watch?v=NUcX06mGH_g) (video of Pope nomination, last visited on June 4, 2015). Some nominations of challenger candidates proceeded with less interruption, *see, e.g.*, 28<sup>th</sup> International Convention Transcript at 7-12 (Central Region Vice-President nominations), and all floor nominations were ultimately completed at the 28<sup>th</sup> International Convention. The transcript, however, usually notes brief “applause” interruptions for incumbent slate nominees in contrast to extended booing or chants of “Hoffa” that interrupted and sometimes delayed nomination, seconding, or acceptance statements of challengers.

Based on that past experience, and having the IBT firmly “committed to the democratic process,”<sup>4</sup> OES believes that the existing rules framework, including the language from the *Supplemental Rules*, provides the Election Supervisor with authority to control the convention nomination proceedings. OES will consider augmenting those with additional rules or guidance for the 29<sup>th</sup> International Convention regarding the maintenance of order during nominations and the consequences to candidates for failure to maintain the control of their supporters that will allow nominators, seconders, and candidates to be heard and proceed. Before the *Supplemental Rules* are issued, OES will consult with candidates, their representatives, the IBT Sergeant-at-Arms, the Government, and the IBT concerning maintenance of order at the convention. OES will use the prospect and imposition of sanctions as necessary to ensure appropriate conduct by delegates and candidates in connection with the nomination proceedings. *See, e.g., Gegare*, 2011 ESD 289 (June 29, 2011) (Hoffa-Hall Slate nominated candidate William Hamilton fined \$1,000 for improper acceptance statement in convention).

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<sup>4</sup> IBT Press Release, *Judge Approves Agreement Ending Government Oversight of Teamsters Union* (Feb. 17, 2015).

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Mr. Suetholz requests amendment of Art. VI, § 6(d) to restrict participation in the required Candidate Forum to candidates nominated for the office of General President, and to eliminate the option of such candidates to designate a co-slate-member nominee for General Secretary-Treasurer to stand in at the forum. This provision was negotiated by the Government and the IBT in 2005 and was also incorporated into the *2011 Rules*. The *Rules* for the 2016 election “shall not differ in any material way from the rules that governed the 2011 International Union and Delegate Election.” *United States v. International Brotherhood of Teamsters*, 88 Civ. 4486, D.I. 4414 and 4409-1, Final Agreement and Order at ¶ 19 (S.D.N.Y Feb. 1, 2015). Given this subsection’s history, OES submits that the proposed change would be “material” and could not be imposed absent agreement of the parties.

Mr. Suetholz requests amendment of Art. VII, § 6(c) to require live streaming of the Candidate Forum and consideration of “other” technologies for dissemination of the forum. The *Proposed 2016 Rules* already provide the Election Supervisor with considerable discretion to determine how to disseminate the Candidate Forum. Technology allowing for live streaming of events has proliferated since the 2011 election and will certainly be considered well in advance of the actual candidate forum to allow for candidates to publicize the event. Specific implementation of this suggestion will be addressed in *Supplemental Rules* governing conduct of the Candidate Forum. As the *Proposed 2016 Rules* already provide OES with broad discretion, the suggested amendment is not necessary.

**E. Barbara Harvey – Comments on Protest Database, Election Procedures, and the Comments Submitted on Behalf of Zuckerman.**

Barbara Harvey, on behalf of Teamsters for a Democratic Union (“TDU”) seeks two changes to the *Proposed 2016 Rules* in addition to endorsing the comments submitted on behalf of Candidate Zuckerman.

The OES website makes available protest rulings from the 2001, 2006, and 2011 elections, and will post protest rulings made in the course of the 2016 election. The postings date from the start of the OES website. TDU requests amendment of the *Proposed 2016 Rules* to require OES to post decisions from the 1991 and 1996 elections.

OES submits that posting of the rulings from the first two elections should not be a requirement of the *Rules*, nor should the *Rules* mandate permanent maintenance of the site. How OES communicates and makes materials available in the future is a matter of administration and should not be limited to present technology. Anyone who wants to download the materials from [www.ibtvote.org](http://www.ibtvote.org) and maintain their own library is free to do so.

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OES does understand TDU's point concerning the availability of prior rulings, however, and is considering how best to address it. The rulings from 1991 and 1996 rulings do not exist in any electronic form that can simply be posted to the OES website. OES will explore the costs involved with scanning and cataloging the thousands of decisions involved and determine whether it is feasible to prepare the 1991 and 1996 rulings for posting and indexing, with the text rendered *accurately* by scanning, at reasonable cost.<sup>5</sup> In any event, if any person requires guidance from a decision from 1991 and 1996, OES will make particular decisions available on request.

TDU requests amendment of Art. II, § 2 to eliminate the possibility of alternatives to mail ballot voting. Regarding electronic methods of voting, as stated in response to the query from Mr. Fitch, this language was inserted into the *Proposed 2016 Rules* to allow OES flexibility to use alternative methods of voting if such methods are ever approved under applicable federal law: there is no basis on which such methods could be used during in the 2016 International Officer Election. Regarding the possibility of in-person voting as an alternative to mail ballot the *Proposed 2016 Rules* presume that balloting will be by mail and that any alternative method must be (a) allowed by law; and (b) specifically approved by the Election Supervisor as providing "protection and security for the member's secret ballot at least equivalent to the mail ballot." Such "protection and security" includes the right to cast a secret ballot free from any form of retaliation or coercion. Given that standard, OES recommends that the proposed change not be adopted.

TDU fully endorses the comments submitted on behalf of Candidate Zuckerman. The OES analysis of those comments is set forth above.

**F. OES Administrative Change.**

In reviewing the *Proposed 2016 Rules*, OES has noted and corrected non-substantive typographical errors. OES does recommend one substantive, although minor, change to the rule regarding the balloting period for delegate elections. The *Proposed 2016 Rules* require the time period from ballot mailing to the count date to be at least 21 days. *See* Art. II, § 7(d). Recent experience with the United States Postal Service and with Canada Post suggests that current levels of service have slowed mail delivery from what had been the norm in earlier election cycles. Accordingly, OES recommends that the minimum required period for balloting be extended by three days, and that the first sentence of Art, II, § 7(d) be amended as follows:

The Notice of Election shall be included in the mail ballot package which shall be mailed no later than twenty-one (21) four (24) days prior to the deadline for return of ballots.

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<sup>5</sup> This project was not contemplated when preparing the current OES budget.

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The *Proposed 2016 Rules* provide that ballot mailing “shall commence no sooner than thirty (30) days after the final nomination meeting.” Art. II, § 7(a). Adding a 24-day balloting period means that 54 days is the minimum period for completing an election from nominations through ballot count. Accordingly, OES recommends that the overall periods for delegate nominations and elections be adjusted as follows to accommodate the 54-day schedule:<sup>6</sup>

Fall Nomination Period	09/01/15 – 11/07/15
Fall Election Period	10/24/15 – 12/31/15
Winter-Spring Nomination Period	01/04/16 – 03/07/16
Winter-Spring Election Period	02/27/16 – 04/30/16

These changes would be made to the Timetable of Events, and to the corresponding sections of the *Proposed 2016 Rules*, as follows:

Art. II, § 5(a): For Local Unions entitled and choosing to nominate and elect their Convention delegates during the fall of 2015, and who timely submit a proposed Local Union Plan to the Election Supervisor, the nomination of Convention delegates and alternate delegates shall take place ~~during September, October or November of 2015~~ from September 1, 2015 through November 7, 2015. For Seasonal Local Unions, the nominations for delegates and alternate delegates shall be held on the dates the Election Supervisor has set under Section 3 of this Article. For all other Local Unions, the nomination of Convention delegates and alternate delegates shall take place ~~during January, February, or March of 2016~~ from January 4, 2016 through March 7, 2016.

Art II, § 7(a): For Local Unions nominating delegates and alternate delegates in Fall 2015, the election of delegates and alternate delegates shall take place between ~~October 20, 2015 and January 3, 2016~~ October 24 and December 31, 2015. For seasonal Local Unions, the election of delegates and alternate delegates shall be held on the date(s) established pursuant to Section 3(a)(2) of this Article. For all other Local Unions, the election of delegates and alternate delegates shall take place between February 22, 2016 and April 30, 2016.

<sup>6</sup> The endpoint for fall elections is also adjusted to December 31 from January 3, to remove dates around the New Year holiday, when there is no mail delivery, as election count dates.