

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case	Date Filed

INSTRUCTIONS:

File an original and 4 copies of this charge with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Keyspan Energy Delivery, Inc., a Division of National Grid, Inc.		b. Number of Workers Employed 5000
c. Address (street, city, State, ZIP, Code) One Metrotech Center Brooklyn, NY 11201	d. Employer Representative Robert T. Greenbaum Director of Human Resources	e. Telephone No. (718) 403-2797 Fax No. (718) 243-2653
f. Type of Establishment (factory, mine, wholesaler, etc.) Gas and Electric Utility	g. Identify Principal Product or Service natural gas	
h. The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of Section 8(a), subsections (1) and (1st subsections) (5 of the National Labor Relations Act, and these unfair labor practices are unfair practices affecting commerce within the meaning of the Act.		

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices.)

Since on or about May 4, 2009, the above-named employer has refused to bargain with Local 101, Transport Workers Union of America, a labor organization representing the employer's employees, by unilaterally installing "drive cams" in vehicles driven by Local 101 bargaining unit members, by failing and refusing to negotiate with Local 101 regarding the installation of the "drive cams" and the terms, conditions and impact of said installation, and by unilaterally changing the disciplinary system and terms and conditions of employment by installing cameras in hundreds of vehicles operated by Local 101 bargaining unit members for the purpose of monitoring the members, evaluating their performance, and imposing discipline.

At a meeting held on May 4, 2009, the employer announced these unilateral changes, refused Local 101's request to bargain regarding these issues, and announced that installation of the cameras would commence on May 14, 2009, and be completed by May 30, 2009.

By the above and other acts, the above-named employer has interfered with, restrained, and coerced employees in the exercise of the rights guaranteed in Section 7 of the Act.

3. Full name of party filing charge (if labor organization, give full name, including local name and number) Marsha Spinowitz, President, Local 101, Transport Workers Union of America	
4a. Address (street and number, city, State, and ZIP Code) 5724 Second Avenue Brooklyn, NY 11220	4b. Telephone No. 718-745-7597 Fax No. 212-358-1353
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Transport Workers Union of America	

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

By <u>Daniel R. Bright</u> (Signature of representative or person making charge) Daniel R. Bright / Schwartz, Lichten & Bright, P.C. Address <u>275 Seventh Avenue, 17th Floor, New York, NY 10001</u>	Attorney <u>(Title, if any)</u> Fax No. <u>212-358-1353</u> <u>(212) 228-6320</u> (Telephone No.)	<u>May 7, 2009</u> Date
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