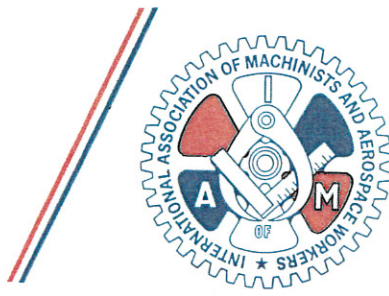


**International
Association of
Machinists and
Aerospace Workers**



9000 Machinists Place
Upper Marlboro, Maryland 20772-2687

Area Code 301
967-4500



OFFICE OF THE INTERNATIONAL PRESIDENT

January 14, 2016

Subj: Request for Proffer
NMB Case No. A-13762

Sent via Email and Overnight Mail

Mr. Nicolas Geale
Chairman
National Mediation Board
1301 K Street NW, Suite 250E
Washington, DC 20005-7011

Dear Mr. Geale:

I am writing to request that the National Mediation Board make a proffer of arbitration in the Mediation Case Number A-13762, involving the International Association of Machinists and Aerospace Workers (IAM) and ExpressJet Airlines. It is quite clear that the NMB's efforts at mediation "shall not be successful."

The International Association of Machinists and Aerospace Workers (IAM) and ExpressJet Airlines entered direct negotiations in July 2010 and NMB has mediated negotiations since October 2014, some 66 months in total, regarding the Flight Attendant craft or class.

These negotiations suffered a delay in the first scheduled mediation date of April 8, 2015, then another unreasonable delay until July 21, 2015. An additional mediated session was scheduled for September 15, 2015 but was cancelled due to the inability of the NMB to provide a mediator. During this entire time, the IAM has been willing to meet ExpressJet in negotiations with or without a mediator present; ExpressJet has refused such meetings. Additionally, the NMB has been non-responsive to the IAM in efforts to move the process.

It is quite clear that the Company is not interested in meeting or in reaching agreement concerning the Flight Attendant craft or class. It is equally clear that the NMB is unable or unwilling to assist the parties in reaching an amicable settlement through mediation and will continue to be unsuccessful. Therefore, the IAM requests that, pursuant to 45 U.S.C. §155, the National Mediation Board make a proffer of arbitration to the parties.

Sincerely,

Robert Martinez, Jr.
International President

RM/mlw

cc: Mr. Harry Hoglander, Member
Ms. Linda Puchala, Member
Mr. Daniel Rainey, Chief of Staff
Mr. Jack Kane, Mediator

Mr. Sito Pantoja, IAM General Vice President
Mr. Dave Supplee, IAM DL 142 President/Dir. General Chair
Ms. Brandee Reynolds, ExpressJet VP-Inflight Services