

October 7, 2021

**VIA EMAIL ATTACHMENT ONLY**

PERB Board Members  
c/o Cheryl Shelly  
Public Employment Relations  
1031 18th Street  
Sacramento, CA 95811-4124

**Re: SEIU California's Comments Regarding Proposed Revisions to PERB  
Regulation 32147**

Dear Chairperson Banks and PERB Board Members:

We submit these comments on behalf of our client, SEIU California. SEIU California is comprised of over 750,000 members. Approximately 550,000 of its members are public employees who are subject to PERB's jurisdiction. It is very important to SEIU California and its public sector members that certain categories of PERB cases are processed in an expedited fashion.

SEIU California supports PERB's proposed revisions to PERB Regulation 32147, subject to the two concerns expressed below. The draft revisions accurately reflect the priorities PERB constituents expressed during the statewide "external stakeholder" meetings PERB convened in 2017 as a part of its Case Processing Efficiency Initiative.

The proposed revisions to PERB Regulation 32147 omitted two important elements. First, the draft amendments do not establish processing timelines for cases that are deemed "expedited." If processing timelines are not specified in the regulation, the designation of a case as "expedited" may be meaningless. If such timelines will not be included in PERB Regulation 32147, it is critically important that the Legislature augment PERB's budget so PERB can hire additional staff. Second, PERB should add to the list of cases that must be expedited "without any motion or order" those cases that are filed under PERB Regulation 61215 (Petition for Recognition filed under the Meyers-Milias-Brown Act). The omission of PERB Regulation 61215 from the existing PERB Regulation 32147(a) appears to be inadvertent, given that PERB Regulation 33050 (Request for Recognition filed under the Employer-Employee Relations Act), PERB Regulation 51030 (Request for Recognition filed under the Higher Education Employer-Employee Relations Act) and PERB Regulation 71030 (Request for Recognition filed under the Transit Employer-Employee Relations Act) are included.

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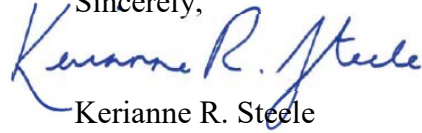
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MAXIMILLIAN D. CASILLAS  
CRAIG L. SCHECHTER

**OF COUNSEL**

ROBERTA D. PERKINS  
NINA FENDEL  
ROBERT E. SZYKOWNY  
ANDREA K. DON  
LORI K. AQUINO

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◆ Also admitted in Nevada  
◆ Also admitted in Illinois  
◆ Also admitted in New York and Alaska  
◆ Also admitted in Minnesota  
◆ Admitted in Nevada and Washington  
◆ Also admitted in Idaho

We plan to participate in the PERB Board Meeting on October 14, 2021, and would be happy to answer any questions at that time.

Sincerely,  
  
Kerianne R. Steele

KRS:sm  
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cc: Ms. Libby Sanchez, Governmental Relations Advocate, SEIU California  
1/1208306