

DECLARATION OF MARY A. COLLINS

I, Mary A. Collins, declare under penalty of perjury that the following statement is true to the best of my knowledge:

1. I was hired by DCPS as a secondary school mathematics teacher in 1976 and retired in June 2009. I have served as a WTU representative in the following capacities over the past 20 or more years: School Chapter Advisory Committee, Senior High School Vice President on the Executive Board, and elected trustee for the active teachers on the D.C. retirement board. I have been a field representative for the WTU for the past 11 years. I am familiar with the election procedures of the WTU, the WTU Constitution and By-Laws, the collective bargaining agreement between the WTU and DCPS.

2. The DC Office of Payroll and Retirement, based on information it gets from DCPS, generates a document called Union Dues Report (UDR), which the WTU is supposed to get every two weeks, approximately three days before the actual payday. The UDR contains information including the name, certification coding (e.g., probationary, permanent), salary step, gross earnings that pay period, and whether they are full dues paying members or non-member agency fee payers. The membership department reconciles the membership list every pay period. This is important information for election purposes because a would-be voter must be employed as an active teacher and be a full dues paying member to be eligible to vote.

3. The summer months are when the membership list is most inaccurate. DCPS hires most teachers in August. Last year DCPS hired about 900 teachers. This year DCPS projects hiring about 600 teachers. New teacher orientation takes place in August and historically over 50% sign a membership form to join WTU. These new members, if

they become actually employed by DCPS (e.g., pass the criminal background check, etc.) and have begun paying full dues are eligible to vote but will not appear on the UDR until September. The reconciliation of the membership list with the UDR provides the information necessary for the membership list to be as accurate as possible.

4. In addition teachers resign, retire or are otherwise separated from DCPS between the end of the school year (this year, June 22) and the start of the new school year (this year, August 17). I estimate that the turnover over the summer months ranges anywhere between 400 and 500, depending on circumstances. These persons continue to be paid because DCPS teachers are on a 26 pay period cycle even though they are 10 month employees. The last paycheck for the preceding school year is August 27. September 10 is the first pay period for the new school year. The September 10th UDR is still not sufficient for an election because major changes will be happening and the UDR at the first pay period at beginning of the school year is never accurate. It takes three to four pay periods to get a reasonably accurate and manageable membership list.

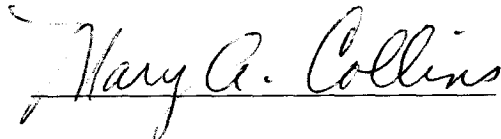
5. To administer an election, the director of membership gives the Election Committee access to the latest membership list which has been reconciled with the UDR. The Election Committee verifies that 20 names on petitions appear on the reconciled membership list. The Election Committee notifies the WTU Executive Board about which would-be candidates qualify to run for office and which do not. This process takes anywhere from one to three days, depending on how many members of the Election Committee are working on the process and how long they do so each day. This process takes place in the union office. The membership list is confidential and remains in the

custody of the WTU at all times during this process. Similarly, the petitions remain secured in the custody of the WTU.

6. The only other time the Election Committee has access to the membership list is just prior to the WTU sending the membership list to the outside agency (typically the American Arbitration Association). The outside agency sends out the ballots. The Election Committee checks the accuracy of the membership list against the UDR before recommending that the membership list be sent to the outside agency. In my experience this process takes no more than two or three days, depending on how many members of the Election Committee are working on the process and how long they do so each day. This process takes place in the union office. Here again the Election Committee has access to the membership list but it remains in the custody of the WTU.

7. Under the current election schedule, nominations close on October 29. The UDR of October 29 will be reconciled against the membership list at that time. The Election Committee will likely convene on the first business day after the close of the nomination period to verify the petitions, that is, November 1.

Dated: July 20, 2010

A handwritten signature in cursive script that reads "Mary A. Collins". The signature is written in black ink and is positioned above a horizontal line.

Mary A. Collins