

**Teamsters Local 633 and Town of Loudon**, Decision No. 2018-209 (Case No. G-0273-1), reversed on appeal. See *Appeal of Town of Loudon*, Case No. 2019-0229 (March 17, 2020).

Background: The union sought to represent certain employees (Police, Fire, & EMT) of the Town of Loudon. The town objected on the grounds that the proposed unit (1) lacked a community of interest required under RSA 273-A:8; (2) inappropriately included irregular or on-call employees (part-time Police Officers and Firefighter) in violation of RSA 273-A:1, IX (d); (3) inappropriately included a confidential employee (Administrative Assistant) in violation of RSA 273-A:1, IX (c); (4) did not include a minimum of ten employees as required under RSA 273-A:8; and (5) inappropriately included supervisory employees (Police Sergeant and Police Corporal) in violation of RSA 273-A:8, II.

Decision: The part time patrol officers were on call employees within the meaning of RSA 273-A:1, IX (d) and were, therefore, excluded from the bargaining unit. The part time firefighter/EMT was not an irregular or on call employee within the meaning of RSA 273-A:1, IX (d) and was included in the bargaining unit. The police corporal and police sergeant were not supervisory employees within the meaning of RSA 273-A:8 and were included in the bargaining unit. The fire department administrative assistant was not a confidential employee within the meaning of RSA 273-A:1, IX and was included in the bargaining unit. The employees in the proposed bargaining unit had a sufficient community of interest such that it was reasonable for them to negotiate jointly; and the bargaining unit satisfied the ten employee-minimum requirement under RSA 273-A:8. The unit was otherwise approved and the case proceeded to a representation election.

***Disclaimer: This summary is intended to provide a brief description of the issues in this case and the outcome. The summary is not a substitute for the decision, should not be relied upon in place of the decision, and should not be cited as controlling or relevant authority in PELRB proceedings or other proceedings.***