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Sent Via E-Mail:

January 4, 2016

PWR Coordinator
Bureau of Labor and Industries
800 NE Oregon Street, Suite 1045
Portland, OR 97232

Re: Proposed change to occupational definition for Laborers

The International Brotherhood of Electrical Workers Local Union 48 represents over 4,000 licensed electricians and electrical workers. I am writing in opposition to the changes to PWR definitions recently proposed by the Laborers District Council. After reviewing the proposal, I see many ways in which the proposed changes conflict with work typically performed by electricians. Also concerning, is the precedent that would be set by adopting such changes based on one craft's collective bargaining agreement.

IBEW Local 48 is strongly opposed to this attempt to broaden Laborer's jurisdiction through PWR definitions. As you know, electricians do a wide range of jobs necessary to support electrical installations and that the proposed definitions would give some of these tasks exclusively to Laborers that they list in the proposal. For example, we do all of the fencing necessary for protection of electrical enclosures or equipment, we do all of our own digging and trenching, including post holes, we operate our own boom trucks and cranes to move materials on a jobsite, we perform brush cutting to clear power lines and do all final clean-up of electrical material. These are just a few examples of how the proposed definitions encroach on work IBEW has historically performed and that is included in our own collective bargaining agreements.

I also believe that accepting one craft's collective bargaining agreement as proof of jurisdiction set a very dangerous precedent. A collective bargaining agreement alone does not determine prevailing wage practice, especially when just one craft's agreement is considered.

I am very concerned that this adoption would have impacts beyond just prevailing wage work and am strongly opposed to the changes.

Thank you for taking the time to consider my comments and IBEW Local 48 looks forward to participating as an interested party as BOLI considers this change.

Please feel free to contact me if you have any questions or would like to discuss my comments further.

Sincerely,

A handwritten signature in blue ink that reads "Gary Young".

Gary Young
Business Manager
GY:lk
OPEIU#11/AFL-CIO

