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September 29, 2015

Sent Via E-Mail: pwremail@boli.state.or.us

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

RE: Proposed change to occupational definition for PEO's

I write this in opposition to the proposed revision to the Definition of Power Equipment Operator (PEO) for prevailing wage work by adding the language "operates all types and sizes of cranes" to their Typical Duties. After reviewing the proposed change it is obvious to me that the change is unnecessary. Additionally the change may have future jurisdictional impacts beyond prevailing wage law.

Many of our members use small cranes, booms and lifts on a regular basis on the job-site and the use of this equipment is essential to performing electrical work, lifting and placing materials, like power poles, conduit, transformers, and tools, to and from high places like rooftops and power lines; the use of cranes in this capacity is well within the typical duties of line constructors and electricians. Electricians have always used cranes in this way and our members are trained and certified to use the equipment safely and legally.

It is my understanding that the proposed change won't expand or change the current interpretation of the occupational definition for PEOs related to the use of cranes. It is also my understanding that the proposed change won't impact BOLI's existing interpretation that small crane work can, and does, also fall within the typical duties of an electrician and line constructor for prevailing wage work. While I appreciate this clarification, I remain opposed and concerned about how this definition might impact future jurisdictional disputes, collective bargaining and relationships on the job site.

As I stated previously, I am extremely concerned that the adoption of this language will have impacts beyond just prevailing wage work and am opposed to this addition to the definition of a PEO. I look forward to participating as an interested party as BOLI considers this change.

Please feel free to contact our office if you have questions or would like further clarification.

Sincerely,

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

Gary Young
IBEW Local 48
GY:lk
OPEIU#11/AFL-CIO

