



April 15, 2015

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

Re: Response to Request to revised the BOLI Power Equipment Operator definition by adding the Party Chief subclassification to Group 2 made by the International Union of Operating Engineers/Local 701

Dear PWR Coordinator:

This letter is in response to the requested revision of the BOLI Power Equipment Operator definition by adding the Party Chief subclassification to Group 2 made by the International Union of Operating Engineers/Local 701 ("Union") and submitted to BOLI for review.

We oppose a change in the definition to include "Party Chief" as a subclassification for several reasons and believe that no action is needed by BOLI.

Although our firm does not currently, provide survey services in Oregon, we provide these services in other states and are well aware of the work performed by Party Chiefs. The factual background provided by the Union letter is not an accurate depiction of survey services including the role of the Party Chief. The duties of a Party Chief were not adequately represented.

The Union is incorrect in the job description provided for "Party Chief," they also fail to provide a distinction for the position that is not already addressed in other standard BOLI occupational definitions. There is no value in adding another "title" and new subclassification unless the physical aspect of the work is different. The physical descriptions of the work provided by the Union is already covered under the current BOLI definitions of "Stake Setter," "Brush Cutter" and "Stake Chaser."

We have reviewed the letter prepared by Mr. Sean Gay of Stoel Rives LLP on behalf of David Evans and Associates, Inc. and agree with his evaluation of the issue. We incorporate the letter submitted by Mr. Sean Gay into this letter by reference, including the analysis and statements made in objection to the request made by the Union.

Finally Quincy Engineering's submission of this response is not a waiver of any rights or remedies under the law (including, but not limited to, the Oregon Administrative Procedures Act), all of which are reserved. We appreciate the

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consideration of the PWR Committee in evaluating this issue and considering our perspective as a company that provides surveying services

Sincerely,

Quincy Engineering, Inc.

A handwritten signature in blue ink that reads "Karen A. Tatman".

Karen A. Tatman, P.E.

Principal