

Name/Company	Questions?	For/Against	Brief description
Gregory Fast	No	Against*	Disservice at best to the workers to eliminate the "apprenticeship" requirement and replace it with an undefined "trainee" standard.
Vickie Lam	No	Unclear	Withdraw these proposed regulation changes to Title 8.
Jeri Thompson	No	Against*	Do not change title 8 requirements for apprentices to change to trainee.
Douglas OBrien	No	Against*	The apprenticeship programs are there to instill knowledge and the correct way of conducting construction duties with safety in place and awareness for hazards.....
Amber Cartier, ABC of Alaska	Yes		In section 8 AAC 90.165 – In order for someone to obtain a trainee certificate of fitness must they still be indentured into an OA accredited program? Or will a person enrolled in an apprenticeship now fall under a “student trainee” since we are a federally registered education program?
Ella Demoski	No	Unclear	Opposed to the decision to end any apprenticeship electrical standards.
John Hakala	Yes	Against*	Many concerns, <i>see</i> e-mail. <i>See</i> highlighted .pdf for questions.
Patrick ODonnell	No	Unclear	Opposed to the states anti apprenticeship regulation.
Larry Denig	No	Against	Maintain all union apprentice programs.
Eugene Yerbich	No	Unclear	Opposed to ending of any apprenticeship program.
Deborah Kelly, Statewide Apprenticeship Director NECA/IBEW	Yes	Unclear	Many questions and concerns. <i>See</i> emails, with questions and another with comments. Withdraw current proposal and engage with stakeholders.
Tom Taylor	No	Unclear	Good apprenticeship programs are important.
Mike Milligan	No	Against	Opposed to any regulations that will weaken Alaska standards for apprenticeship.
Schaffer John	No	Against*	Proper and accountable apprenticeship training.
Robert Glorioso	Yes	Unclear	Unjustly attempt to water down workers’ rights. What’s this new alternative that you’re trying to replace it with?
Chip Curry	No	Unclear	Ending apprenticeship programs is a bad idea.
Cathy Jones, Local 942 and 341	No	Unclear	We need apprenticeships.

A.J. "Joey" Merrick II, Alaska District Council of Laborers	No	Against*	Many concerns, <i>see</i> e-mail.
Theodore Swanson	Yes	Against	Many concerns, <i>see</i> e-mail. <i>See</i> highlighted .pdf for questions.
Mike Notar	No	Against*	Reconsider these changes and leave what is already good practices alone.
Eric Jensen	No	Unclear	...our electrical apprenticeship programs are already the weakest in the country and that if you loosen up the regulations any more we not only will see higher fatalities in the industry from electrocutions and fires, but Alaska will be producing the lowest quality electricians and the lowest quality electrical work.
Hannah Wilson	Yes	Against*	Are these the people you potentially want building public buildings? Would you feel safe in a building knowing it was built by one journeyman and ten potentially completely inexperienced "trainees"?
Mike Desmond, Western Mechanical, Inc.	No	Against*	Does not support 90.140 & 90.300.
Kyle Kaiser, OIF/OEF Veteran	No	Unclear	The proposed changes/elimination of Electrical and plumbing/pipe-fitting apprenticeships is unacceptable.
Bonnie Nichols	No	Against	Not in the best interest of workforce dev. in the state.
Margie Goodrich	No	Unclear	I strongly oppose reducing or eliminating apprenticeship standards of competency.
Patrice Parker	No	Unclear	The rules and regulations are there for a very good reason - to protect the lives and limbs of the workers, and to protect the public from the dangers that come from shoddy workmanship.
Robert Yost	No	Unclear	Forward standard reply of opposition by local 341.
Sergio F. Acuna, Business Rep. Laborers' Local 341	No	Against	Eliminating apprenticeship standards, and allowing journey worker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death.
Joseph Smith	No	Unclear	Forward standard reply of opposition by local 341.
Don Rouleau	No	Unclear	Forward standard reply of opposition by local 341.
Tyler Svedin	No	Unclear	Forward standard reply of opposition by local 341.
Kimberly Thimsen- Whitehead	No	Unclear	Forward standard reply of opposition by local 341.

Charmalee Howard	Yes	Unclear	Why would you want to turn this state into another Alabama?
Seanna Hines	Yes	Unclear	Do we need a first death/lawsuit to support out any perceived cost reductions???
Dale Rooney	No	Unclear	Apprenticeship is the foundation of expertise for skilled craft workers. Please to not eliminated this requirement.
Michael Rodgers	No	Unclear	I'm against the Proposed Regulations to weaken apprentice standards.
Alex Chung	No	Unclear	These so-called regulations will place workers at greater harm. Please put a stop to these efforts.
Nona Dimond, IBEW	No	Against	...would wreak havoc on Alaska's construction apprenticeships.
Becky Moeller	No	Against	Safety workers and me as a tourist.
Michael Speciale, IBEW	No	Against*	Making these proposed changes will ultimately culminate in a net loss of value to our state. To save us from a thesis, I will reduce my concerns to a pithy quote.
George McGuan	Yes	Against*	What I would like to know most of all is why this change was deemed to be necessary. Was there any input from a single tradesman or tradeswoman?
Sean Kelley	No	Against	These regulations undercut our longstanding, privately-funded training programs supported by contractors and construction workers
Brandon McGuire	No	Unclear	Both the proposed changes in apprenticeships and licensing are ridiculous and will only hurt the state in the long run. It's obvious that whoever came up with this idea has no clue what they are doing.
Michelle Gillette	No	Against	Stop job-killing, harmful regulations
Cam Farrally	Yes	Against*	Did you know the IBEW was formed to fight for worker safety because at the time (the 1890's) being a power lineman was the most dangerous job on earth?
Shanah Stone	No	Against	Puts workers, their rigorous training, and their future on the line.
Dennis O'Connell	No	Unclear	I feel the proposed worker safety are a dangerous move since they weaken worker safety overall.
Amber Cartier, ABC of Alaska	No	Against*	See letter. Several concerns.
Tyler Desjarlais	No	Against	As a citizen voicing my opinion during public comment, I oppose changes to proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1.

Shelly Fraley	Yes	Unclear	I ask you, would you yourself rather have someone working on your job who could cause harm or be harmed due to poor training. Imagine if that were your son, daughter, husband, wife or grandchild. <i>See email for comments.</i>
Steve Wisdorf, Wired AK LLC	No	Against*	I am TOTALLY Opposed to these new regulations.
John Jensen	No	Against	I am highly dubious about the proposed change to apprenticeship training programs for Alaska electricians and plumbers.
James B. Hamilton	No	Unclear	The apprenticeship training, through IBEW, is very essential to becoming a highly qualified journeyman lineman.
Barbara McDaniel	No	Unclear	Protect Alaskans and Jobs - Say No to Proposed Regulations
April Lewis	No	Against*	These changes lower education & safety for our state's workforce & should not be approved.
Jason P. Ebberson	No	Unclear	Keeping the COF is necessary to save lives. This isn't a game.
Joel Ramert	No	Against*	The most important and meaningful training and knowledge in apprenticeship programs is the one on one work with a journeyman.
Everett Collins	No	Against*	
James Dahl	No	Against*	Eliminating apprenticeship standards, and allowing journeyworker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death.
Mike Snell	No	Unclear	If this change in regulation occurs there will be added injuries and hazardous work done that will expose workers and the public to injury.
Terry McGahan	No	Unclear	This change is a terrible idea, Alaska's work place is dangerous enough .keep the existing system intact.
Bob Peters	No	Unclear	
Maverick Boyer	No	Unclear	Protect Alaskans and Jobs - Say No to Proposed Regulations
Joe Peters	No	Unclear	I oppose this legislation.
Nathan Smith	No	Unclear	Do not go ahead with these changes, please.
Susan Miller	No	Unclear	Do not implement a New regulation that allows unskilled workers to work on job sites.
Leo Grasso	No	Against	I am writing to express my strong opposition to the proposed changes of the Alaska administrative code

			regarding journeyman certificate of fitness for plumber, electricians and power lineman.
Steven Horwatt	No	Against*	Stop job-killing, harmful regulations
Janell Grenier	No	Unclear	No one should be allowed to cut corners.
Andy Korzenwhisky	No	Unclear	This is a terrible idea for skilled professions and trades, especially in the dangerous electrical field.
Thayne Hacking	No	Against*	Wanting to reduce the ratio of jry to apprentice is a bad decision.
Ryan Burnett	No	Against*	The proposed ratio change from 1:1 to 10:1 for journeyman/apprentice ratio is unfathomable.
Robert Schachle	No	Unclear	I truly think by bypassing Apprenticeship and taking away the fitness card I believe it will hurt Alaska as a hole.
John Waldrop	No	Against*	This proposed regulation is absolutely a joke and not needed in Alaska!
Brannon Nichols	Yes (after the deadline)	Against*	Why would we loosen requirements to obtain certification in some of the most dangerous jobs in the State?
Clayton Bessette, UA Local 375	No	Unclear	To remove regulations exposes the public and the workforce to severe and even fatal accidents.
Aspen Marlin	No	Against*	If we make it a 10-1 ratio with little to no training it will be pure chaos.
John Johnson	No	Against*	Bring down the knowledge and training as well as prolong the apprenticeship to the extent the good workers will seek other jobs with ample pay.
Jesse Kolbeck	No	Unclear	It would be a huge mistake to take away the apprentice for our lineman trade, we need the time and knowledge put in to maintain our electrical grid safely and properly.
George Radulescu	No	Unclear	
Seth Hurd	No	Against*	My biggest concern is safety for the workers and these proposed changes laugh in the face of safety.
David Berry	No	Against*	The proposed changes to title 8 will do nothing but hamper the electrical and plumbing trades.
Steven Grimes	No	Unclear	I do not approve of these Labor changes that Governor Dunleavy is trying to pass, it is a slap in the face to all skilled labor forces and should not be passed!
Mackenzie Fosberg	No	Against*	Please consider this carefully when evaluating a change to the licensing requirements in Alaska, all of our lives depend on it.

Daniella Vasquez	No	Unclear	The Alaska Department of Labor Regulation's changes to skilled labor apprenticeships endangers lives of workers & the public.
Daniel Huff	No	Unclear	These new regulations will get unskilled newcomers injured or even killed, in some of the more dangerous job sights in this state.
Gilbert Burnet	No	Unclear	These regulations are bad for Alaska.
Bradford Hartman	No	Unclear	Journeymen Labor is properly taught by an apprenticeship program that focuses on safety and trade skills, not by watering down requirements.
Daniel Wuestenberg	No	Against*	After looking over the proposed deregulations, all I can say is this: Increased productivity at the expense of safety is not an increase at all.
Charles Neville	No	Unclear	Please do not pass this legislature that takes away from our industry training and puts workers lives at stake.
Peter Jurczak	No	Unclear	Please do not lower the existing standards for apprentice plumbers and electricians in Alaska.
Dennis Kananowicz	No	Unclear	It is my opinion that the proposed changes will reduce safety standards, resulting in unnecessary accidents.
David B. Paden	No	Unclear	I sincerely hope this does not fall on deaf ears, as this is a Huge public health and safety issue.
Bob MacKinnon	Yes (received after the deadline)	Unclear	Certificate of Fitness New Regulations
Timothy Willis	No	Unclear	if anything raise the standards for becoming a licensed skilled tradesmen...
Crystal Enkvist, Executive Director, Alaska Power Association	Yes (received after the deadline)	Unclear	What is the Department's procedural timeline for the process of reviewing comments and questions, and potentially implementing the proposed changes?
Ann Binnian	No	Unclear	I am extremely concerned about the safety ramifications of removing apprenticeship requirements from these trades.
Jed Cress	No	Unclear	I do not believe these new regulations are good for Alaska or Alaska's workers.
Bob Hubbard, UA Local 375	Yes (received after the deadline)	Against*	See letter attached to email.
Chris Sexton	No	Unclear	Please do NOT think about reducing these much needed programs.
Rick Spencer	No	Against	Particularly offensive to me is the 8AAC90.300 c.), allowing student

			trainees ratio to be 10 for every one journeyman. Are you serious?
Jason Alward	No	Against*	See letter attached to email.
Shane Bennett	No	Unclear	I full heartedly oppose any restriction on apprenticeship standards.
Travis Carlson	Yes (received after the deadline)	Unclear	Could you just imagine, a large essential building catching fire and causing the deaths of many people because of crummy political reasons? I worked on Ted Stevens International Airport Expansion, what if that job was completed with mostly trainees, the liability of it?
Jessica Waldrop	No	Against	Changing this regulation it would drastically hurt our skilled trade work force.
Aaron Plikat, UA Local 367	No	Against*	See letter in email.
Bruce Devore	No	Unclear	Do not reduce the apprenticeship program. Keep our standards up, and keep us safe.
Brent Michalski	No	Unclear	This is not going to fly.
Jon Stearns, Building Inspector, CBJ	No	Unclear	In regards to my job now as a building inspector I'm even more offended by the proposal to do away with apprentice programs.
Shawn Williams, Building Inspector, CBJ	No	Unclear	I am writing to express my concerns with eliminating the current apprenticeship requirements.
Corey Randall	No	Unclear	Please don't deter from these standards as our job is hazardous enough as is.
Collin Cantrell	No	Unclear	Hello, I feel it is very necessary to make sure people have the proper training Doing any plumbing or electrical work in the state of Alaska
John Plutt	No	Against*	I reiterate my opposition to these administrative changes.
Rodney Wolcott, Training Director, UA Local 375	No	Against*	See letter in email.
Brandon Mckechnie	No	Against*	There is so many hazards that can and will happen and not having the 1:1 ratio which insures proper training to mitigate these situations there will be consequences.
Jeff Hedges, Building Inspector, CBJ	No	Against*	Do not make these proposed changes to Title 8 of the Alaska Administrative Code.
Adam Lee Staley	No	Unclear	Anything that would reduce supervision of electrical training such as allow more apprentice or trainee per licensed electrician must be prevented.

Carrie VanDeHei	No	Against*	I'm writing today to express my opposition to the proposed regulation changes regarding apprenticeships
Dennis Knebel	No	Against*	I am writing today to express my staunch opposition to the proposed regulation changes affecting the plumbing and electrical skilled trades.
Steven Peters	No	Unclear	There is no place in any workforce for an uneducated employee. Especially in the electrical industry.
Bowen Webb	No	Unclear	I do not want the IBEW apprenticeship to change!
Lineman8181 (no name)	No	Unclear	I can see it going bad for employees and employer's.
Matthew Amor	Yes (received after the deadline)	Against*	Who would want something be done incorrectly? Who would want someone to die because there isn't a journeyman or foreman watching what they are doing?
Nathan Lapierre	No	Unclear	Please rethink the new proposed regulations.
Dana Carros	Yes (received after the deadline)	Unclear	Are you kidding me?
Debra Tjon	No	Unclear	I can't believe how incredibly dangerous this proposition is.
Ken Seagle	Yes (received after the deadline)	Against*	Can you imagine if a change like this was implemented with our fire departments, police departments, even Airlines? Can you imagine having a fire department crew show up at your burning house with your child trapped inside, and knowing that only one of the men showing up was a professionally licensed and trained fireman, With the other 6 to 10 members of his crew being trainees? Can you imagine having somebody committing an invasion of your house, and knowing that you had a one in 10 chance of the officers showing up being fully trained and licensed to do their job? Would you be comfortable with a trainee police officer searching your home, weapons drawn, with you and your family inside? Can you imagine getting on an airplane knowing that you had a one in 10 chance of a fully trained pilot being behind the wheel? You maybe thinking to yourself, "What do these examples have to do with power line work, or electrical work?"

Laura Bonner	No	Against*	Update Alaska's Code but reject any proposed changes to licensing.
Ben Dunham	No	Against*	These proposed regulations are dangerous and should not be changed.
Thomas Moore	No	Unclear	Please don't get rid of apprenticeships and testing.
Hiram Pendergrass	No	Against*	I hope you will reconsider these proposals.
Greg Zadina, Local 375	No	Against	<i>See</i> letter attached to email.
Walter Robinson	No	Against *	<i>See</i> letter attached to email.
Jamison Johnson	No	Unclear	The proposed changes that some "law makers" are trying to push through to weaken or eliminate legitimate apprenticeship programs is one of the worst ideas that anyone has come up with in the labor industry's history of our great state.
Levi Frampton, Doyon Associated. LLC	No	Unclear	My concern with the proposed changes is that it will weaken the skill level of the workforce.
Joe Wilson	No	Unclear	I will not vote for the person's backing this bad and misinformed idea.
Mike McGlinchy, TCI Construction Company	No	Against	<i>See</i> letter attached to email.
George Bennett	No	Unclear	I oppose the proposed change to apprenticeship standards.
Quinn Malcolm	No	Against	Please vote no and oppose this.
Todd Smith	No	Unclear	Please do not let this proceed.
Michael Reynolds, Alcan	No	Unclear	The proposed changes will not only weaken the ability for ALASKAN contractors and workforce to secure work in ALASKA, it will greatly increase the danger to my fellow tradesmen, and end users.
Joe Carlson, Alcan Electric	No	Unclear	These proposed changes will adversely affect the safety of the electrical installations throughout Alaska and our fellow Alaskans will need to be informed of your decision if these proposed changes are enacted.
Michael Rodgers	No	Unclear	These new regulations erode public trust.
Robert Funk	No	Against	It seems to me to be a very bad idea to have trainees that are not enrolled in any approved training course if that is what is to be allowed by the new regulations.
Jeff Leete	No	Against	The current AAC regulations work. As an industry professional and concerned Alaskan: "If it isn't broke, don't try to fix it."
John Hakala	No	Against*	<i>See</i> letter attached to email.

Jason Fernandes, UA Local 367	No	Against*	<i>See</i> letter attached to email.
Swanee Swain	No	Against*	My main concern about these proposed regulations, is SAFETY!!
Casey Stokes	No	Against	Thank you for your time and please consider the decades of hard work fought for to get these current standards in place, it would be a shame to change that all with the passing of this proposed changes
Travis Bonnet	No	Against*	Breaking down the requirements to a higher rate of student trainees to journeyman will be breaking down the higher standard of craftsmanship, safety, and training that Alaska has had for so long.
Patrick Darby	No	Against	I'm sure that every rational person can see the need to maintain our current high standards for these industries. Please do not capitulate to lobbyists that want to dilute Alaskan wages and Alaskan standards.
Joseph A Matthew	No	Unclear	I am totally opposed to this change as it will drive down wages and allow for unskilled labor making our jobs more hazardous than they already are.
April Miranda	No	Unclear	I'd like to see our state uphold a high level of expectation for training and licensing for skilled labor and all other professions in our state.
Robert Sandstrom, American Mechanical, Inc.	No	Unclear	These proposed changes make us question the quality of future State licensed apprentices and journeyman. Changing or eliminating any of the current apprenticeship requirements will be detrimental to a well-trained Alaskan workforce.
Eugene (Skip) Lundstrom	No	Against	I am very much opposed to the proposed change and urge the Commissioner of Labor to trash the concept.
Eric Gavalya	No	Against*	I and everyone I have talked to so far is opposed to this change in regulation, mainly and most importantly because of safety.
Brad Baldridge	No	Against*	I'm concerned and do not agree with proposed labor changes.
Kenneth Sweet	No	Against*	<i>See</i> email, many issues.
Edward Frances	No	Against*	I am writing to oppose regulation changes for the following reasons.
Wayde Leder	No	Against*	I am writing in strong opposition to the proposed changes to the Department of Labor regulations 8 AAC 90.300. This proposed change is an outrage.

Marcie Obremski	Yes (received after the deadline)	Against*	What journeyman can effectively instruct 10 “trainees” while performing safety-sensitive work in the safest manner?
Cody N. Marlow	No	Unclear	The DOL is actively choosing to endanger the people of Alaska, for reasons that don't even come close to the cost of a life.
Anonymous User	No	Against*	Oppose this!! Keep apprenticeships alive in AK and safety at the forefront.
Kayla Steenbergen	No	Against	I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.
Peter McKay	No	Unclear	The system isn't broke. Please don't try and fix it.
Vicki P. Van Fleet	No	Unclear	The new regulations or should I say lack thereof - would be harmful for not only the public, but also the workers.
Larry Garrity	No	Unclear	The lives lost along with the equipment and structure damage will be enormous.
Jean I. Leder	No	Against*	These proposed changes benefit no one with the exception the profit margin of businesses.
Carl Gebhardt	No	Unclear	The mere thought of allowing someone who is not tested to enter into this workforce to me is asinine
Mel Weeks, Patrick Mechanical & Aleut PM Holding Co.	No	Unclear	<i>See</i> letter attached to email.
Matt Kruger	Yes (received after the deadline)	Unclear	No training program for one of the most dangerous jobs in the world?
Forrest Roy	No	Against	I am writing in staunch opposition to new regulations proposed by DOL that would dramatically scale back worker protections and devalue workers credentials.
Tim Mellard	No	Unclear	I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.
William Beltz	No	Unclear	This is a dangerous move that will impact all workers in the skilled trades.
Richard Shank	Yes (received after the deadline)	Unclear	What incentive would we offer somebody that is more skilled and knowledgeable than somebody that we just picked up from off the street, or someone that had never touched any of these things that were working on?
Charles T. Milton	No	Against*	I believe the purposed changes for the electrical field workers is a very a bad idea.

Jacob Wright	No	Against*	This is the worst plan that I have ever heard of. The dangers of having this many apprentices to one journeyman is an outrage.
Nathan May, BP Electrical Lead Tech	No	Unclear	All of these proposed changes will be ABUSED in the future, no matter how well meaning they are now.
Sheila McDonough	No	Unclear	Keep apprenticing alive in Alaska and safety at the forefront.
Bryant Saldarriaga	No	Against*	I am writing in STRONG opposition to the proposal, essentially gutting the programs...
Marc Dugas	No	Against	Keep Apprenticeship programs strong.
Ian Olesen	No	Unclear	Current licensing keeps skilled labor and the public safe.
Kevin Macdonald	No	Unclear	This proposal is a serious mistake.
Francis Lee Haines Jr	No	Against*	Working to improve, not lowering the standards which will cause the loss of Alaskan lives.
Daniel Cogan	No	Against*	It will hurt every job site and apprentice wanting to have a career in the trades.
Senator Click Bishop Senator Bert Stedman Senator John Coghill Senator Gary Stevens Senator Cathy Giessel Senator Natasha von Imhof	No	Unclear	Propose to split into two packages; encouraged to hold stakeholder meets and educate legislators and the public; have AWIB weigh in on it.
Alaska Safety Advisory Council (ASAC)	No	Unclear	Requesting a Withdraw of the proposed regulation changes, and more time. Requests to be kept informed on the status.
James Cummings	Yes (received after the deadline)	Unclear	Why would one try to flood a market with unskilled labor in a trade that is one of the most dangerous in the world? It doesn't make any sense. Is there some benefit that I am not seeing here? All through my apprenticeship as well as my years as a Journey Man the industry has always tried to make my trade more safe to the workers and the public as well as provide skilled labor to businesses that need a specific skill set. I know that Alaska is one of a few if not the only state that does require and fitness card to perform line work is that a bad thing if so how?
Anonymous	No	Against	Apprenticeship programs give Alaskans opportunities to work and succeed in the state they grew up. Don't lower our Standards!
Francisco Hernandez	No	Against	I strongly oppose the proposed regulation changes to Title 8 of the

			Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.
Paul Robarge	No	Against*	Please take the time to talk to me or any other craftsman to explain the dangers we face.
Zachary Coss	No	Against*	I strongly believe the Alaska Dept of Labor should not change the apprenticeship programs
David Wiehl	No	Against	I STRONGLY DISAGREE that this does any kind of good for our State.
James Lammie	No	Unclear	I believe that eliminating the apprenticeship training requirement for plumbing and electrical trainees is a huge step backwards.
Tim Estesén	No	Unclear	We want to have a safe workplace where everyone comes home everyday and electricity is very dangerous stuff.
Jacob Till	No	Unclear	I feel that the regulations proposed will be abused and the possibility of lives lost with lack of intimate knowledge that is passed from journeyman to apprentice.
Anonymous from Ketchikan	No	Unclear	please don't gut the standers we have built over the years here in Alaska
Justin Walker	No	Unclear	I do not support the proposed changes to the apprenticeship standards the job is dangerous at times.
Barret Brown	No	Unclear	Apprenticeships need to stay or else there will be a lot of people getting hurt, or worse, killed.
Luke Glesener, American Mechanical	No	Against*	I hope you see fit to give others the chance at the quality education they deserve in an environment that is safe for them, those around them, and the public as a whole.
Julius Matthew	No	Against*	Increasing the apprentice ratio from 1:1 to 1:10 will not only jeopardize workplace safety and lead to accidents and injuries, it will also jeopardize the quality of training, quality of work, workers livelihood.
Cody Alexander	No	Against	The line trade is very dangerous, it is important to have a solid apprenticeship to educated workers on how to work in this trade, safety is by far the largest part of this.
Mark Bartlett	No	Unclear	For many reasons actually; but the main reasons are this--you must spend an inordinate amount of time with each individual to train and mature them into skilled technicians that are fully capable of the job demands.
Jackie Endsley	No	Against*	There is nothing safe about 10 apprentices to one journeyman. This

			goes against commonsense with such dangerous professions.
Aubrey Birdsall	Yes (received after the deadline)	Unclear	We have always highly spoken about the IBEW and have suggested to many to check it out and join the trade. How can I in good conscience do that now when the safety of future apprentices and my husband and friends are at stake?
Brent Hovden	No	Unclear	For the safety and economic stability of all Alaskans I sincerely hope the Alaska Department of Labor and Work Force Development will not adopted these changes.
Jonathan Bagwill	No	Against*	I make this request as a concerned citizen of this great state who has to live and work and shop in the very buildings that these trainees will be building at the ratio of 10-1 to a skilled journey level electrician or plumber.
Chris Shorey, GVEA-Healy Power Plant	No	Against	I beg you not to adjust the ratio of apprentices, or students to such an extreme imbalance.
Dave Nussbaumer	No	Unclear	I urge the State Dept of Labor not take this risk filled path.
Mark and Karen Talbert	Yes (received after the deadline)	Unclear	So why not eliminate training standards for doctors too? What are thinking? Next time you or family member is in a hospital room with mask on remember that some plumbers ran the miles of pipe to that oxygen tank outside the building. Would like some under trained goof putting the pipe together for your wife or kids? How about it? Have you thought about what could happen to that brand new grandchild that's born prematurely?
Marx Smith	Yes (received after the deadline)	Against*	Electrical work is not an unskilled position and without the constant rigorous testing that an apprenticeship program provides, how do you know that some person with 12,000 hours of working as an electrical trainee can safely do the work?
Kenneth Kemmerer	No	Unclear	This proposal would basically violate the entire premise of reasoning behind establishing the NEC and NFPA to promote life safety and property protection.
Ellen Mannion	No	Against*	Against 90.160, 162, 165 and 300.

Wade Syvrud	No	Unclear	Not a good idea, apprenticeships have been in place for ages.
Tim Hansen	Yes (received after the deadline)	Unclear	Why are you trying to do with our apprenticeship standards we now have in place in Alaska. Why is our governor wanting to have substandard people out there working in construction. Why wouldn't Dunleavy do something constructive for our state and its people.
Christian Vasquez	No	Unclear	I oppose sacrificing the safety of the public because I see no benefits from reducing the type or amount of training required to operate in a fields such as these!
Tom Alexander	No	Unclear	There is no way for 1 Journeyman to effectively oversee that many helpers.
Jeri Thompson	No	Unclear	This just a bad idea and will cost the state millions in damage claims, loss of decent paying jobs for working people and lost opportunities.
Gale B. Foode	No	Against	Absolute No to lethal switching of journeyman/ apprenticeship ratios from 1:1 to 10:1.
Earl Bennett	No	Unclear	I strongly oppose this dangerous and job kill law. People of Alaska will hurt from this bill by giving their jobs away.
Cory Bassett	No	Unclear	Take it from the boots on the ground, it would be foolish maneuver to put a devaluation on our union apprenticeship. You will be putting people's lives at risk and you will be lowering quality and craftsmanship on the job.
Brenda Birdsall	Yes (received after the deadline)	Unclear	With the new changes; are you going to put an inexperienced; untrained lineman with no apprenticeship (on the job training) to be in the bucket with others?
Robb Ashburn	No	Against	Oppose to 90.140 and 300.
Ian Wiedmaier	No	Against*	I am journeyman lineman for the 1547, i do not want to see any of my co-workers put in harms way due to this change.
Gary Brooks	No	Against*	The proposed changes regarding registered apprenticeship requirements in Alaska and adding the new student-trainee section have clearly been proposed by someone unfamiliar with apprenticeship in general or adverse to the nationally recognized and jointly created and administered labor/management programs unparalleled in delivering quality education to American workers for literally centuries.
Joshua R. Parsons	No	Unclear	This is not about union or nonunion. This is about safety. Pure and simple.

Simon T. Josefsen	No	Against*	I can tell you without hesitation that this new regulation is very bad for the industry as well as the well being of the general public.
Joseph Sipes	No	Against*	Strongly oppose 90.140 and 90.300.
Ryan Andrew	No	Against*	Has several objections.
Aldon Zellhuber	No	Against*	This lowering of standards is an unacceptable risk.
Mike Lucas	No	Against*	I am very concerned about the new proposed regulations that will make my working conditions and all Alaskans in the skilled trades more dangerous!!!
Jannarae Sipes	No	Against	Opposed to 90.140 and 90.300.
Ernie Ackermann	No	Unclear	This isn't a proper direction for the State of Alaska. The current system works for everyone, so leave it alone.
Brother CloudRinger	No	Against*	There is no way one person can keep ten leigh man safe and on task. Some thing will get missed. This thing could literally kill my countrymen.
Isaac Nah	No	Against*	I do not agree with these proposed regulations to untrained and unskilled workers that have not gone through the proper training and courses to become skilled and licensed workers in the trades.
Brother Schulz	No	Against*	If this proposition is passed, the quality of workmanship that is responsible for keeping the state safe and healthy will be in jeopardy.
Andrew Nurmi	No	Against*	I am in direct opposition to the proposed regulation concerning trade apprenticeships it puts the workers at risk as well as the final product and the people that will use it.
Adam Yadlosky	No	Against*	Allowing unskilled, cheap, temporary labor to be brought up to our state would greatly hurt our apprenticeship programs.
Robert Schruf	No	Against	Opposed to 90.140 and 90.300.
Bobby Taylor	No	Against*	Diluting the licensing and apprenticeship requirements will most definitely contribute hazards to the public as well as the work place.
Mark Golden	No	Unclear	Several concerns. I came up through the trades non-union and was later recruited into the union. I believe my experience is relevant to the current conversation.
Alice J. Smith	No	Against*	These changes endanger the construction trades in Alaska and all the people who might be affected by dangerous errors the poorly trained apprentices would make.

Jay T. Lawless	No	Against*	Proposed regulatory changes reducing “on-the-job apprentice to journeymen ratios”, and changes to “journeymen certification methods” seem purely profit driven with little regard for life or limb.
Scott Showalter	No	Against	Opposed to 90.140 and 90.300.
Angela Showalter	No	Against	Opposed to 90.140 and 90.300.
Jacob Meyer	No	Unclear	Doing away with the apprenticeship program would discredit the trades as a whole and would cause serious problems long term and short term!
Bruce Laiti	No	Against	Opposed to 90.140 and 90.300.
Jeannie English	No	Against*	Before you act, please consider all the potential fall-out from cutting corners in the trades training programs.
Justin Lane	No	Unclear	The new proposal makes it so that anyone can become a tradesman with zero training.
Charles Scantlebury	No	Against*	Workers that do not have formal training through these registered apprenticeships tend to carry bad habits and teach unsafe work procedures to others in the future.
Dave L. Rolfe	Yes (received after the deadline)	Unclear	Most would probably call this a battle between union and non union work forces but it is not. It feels as though the state for whatever reason wants to sneak in a regulation which makes little to no sense and for what cause?
Preston McKee	No	Unclear	Please take a harder look at the negative impacts of this proposed regulation.
Jim Raymond	No	Against*	Require and keep the necessary training to keep our workers, and us, safe from unskilled and unsafe workers.
Kim Kittredge	No	Against*	I OPPOSE changes to proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1.
Brett Straub	No	Against	Current licensing and regulations provide assurance and documentation that people coming up here to work are in fact properly trained in this highly skilled trade.
Larry Bell, Executive Manager, NECA	No	Against*	The department’s approach dismisses the effectiveness of the comprehensive classroom training and curriculum undertaken by multiple programs with a long history of providing the majority of the most qualified journey level workers in the electrical trade statewide.
Brian Armagost	No	Unclear	Most importantly the dilution of proper training seriously reduces safety. The current system of training has been paid

			for literally, in blood. This administration shall bear the burden for increased injuries and fatalities produced by this proposition.
Adrie Setten	No	Against*	As an Alaskan citizen, taxpayer, and voter, I ask that you vigorously REJECT these proposed regulation changes immediately.
Knute Anderson	No	Unclear	What a step back, shame on this administration.
Dave House	No	Unclear	I do believe we should change the ratio to 2:1 but feel that the program still needs to be in place for the fundamentals and general knowledge.
Serena Green	No	Against*	These regulations impact trades that are highly dangerous and deadly, these regulations would make those jobs even more dangerous.
Jay Quakenbush	No	Against*	I see this change to Title 8 as nothing more than a cheap form of labor.
Kristin Debbin	No	Unclear	When standards are lowered, and safety practices put aside there are no winners.
Seth Thomas	No	Against	Opposed to 90.140 and 90.300.
Dave Reaves, Business Manager, IBEW	No	Against*	See letter attached to email.
Dusty Menefee	No	Unclear	In closing I feel this is step backwards and needs stopped now.
Ed Flanagan	No	Against*	Please reconsider and withdraw or substantially revise this ill-advised reg change.
Jacob Collins	No	Against	Opposed to 90.140 and 90.300.
Les Syvertson	No	Against *	Without the one-one-one ratio for transfer of information, steps can be missed, and accidents can happen, there are no shortcuts in learning proficiency in highly specialized trades.
Dave Neuburger	No	Against	There is no way 1 journeyman can efficiently supervise and teach 10 people to work as an electrician or in the pipe fitting trades.
David Miller	No	Against*	I could go on for days about this. Seriously stop trying to hamstring this state into submission.
Dan Browning	No	Unclear	Our current apprenticeship regulations have been developed over a 100 year plus period weakening them on a whim to help your oil buddies is not safe.
Royce Holmes	No	Unclear	GOOD WORK ISN'T CHEAP, CHEAP LABOR ISN'T GOOD
Matt Whitaker	No	Against	The journeyman-apprentice ratio change is also a joke. Please do not make these changes, it will be a detriment to all.
Troy Hoffner	No	Unclear	There needs to be apprenticeships for all skilled trades.

Steve Neale	No	Unclear	I need apprentices that are trained to understand when I tell them don't touch that it will kill you.
G. Kenneth Helem, Sitka Electric Co.	No	Against*	See letter attached to email.
Diane Ruhl	No	Against*	These proposed changes would severely weaken that model if adopted, resulting in unsafe installations and unnecessarily putting our construction workforce at risk. I highly recommend that the Department withdraw these proposed changes.
Mike Bennett	Yes (received after the deadline)	Unclear	Are you guys trying to be the vanguard for other less enlightened state departments of labor to follow. Is there a sunset to these new proposed regulations or do we wait for a new Governor.
Rep Zack Fields Rep Chris Tuck Rep Jonathan Kreiss- Tomkins Rep Matt Claman Rep Kelly Merrick Rep Gabrielle LeDoux Rep Dan Ortiz Rep Grier Hopkins Rep Ivy Spohnholz Rep Sara Hannan Rep Laddie Shaw Rep Harriet Drummond Rep Andy Josephson Rep Andi Story Rep Louise Stutes Sen Elvi Gray-Jackson Sen Tom Begich Sen Scott Kawasaki	No	Against *	See letter (Rep-Sen multiple).
Alexander Gudschinsky	No	Against	Strongly opposed 90.140 and 90.300.
Larry White, Inside Passage Mechanical Contractors, Inc.	No	Against	There is no way 1 instructor can control 10 student trainees.
Kyle White	No	Unclear	I went through a Union apprenticeship and know the value of a structured apprenticeship.
Virginia Redmond	No	Against*	Concerns and opposition to changes in apprenticeship requirements.
Pamela Cline	No	Unclear	These changes are unacceptable.
Jeremiah Marchwick	No	Unclear	I know without a doubt by passing this proposal it will create an unsafe work area and a water down work force.
Joe Thiede	No	Unclear	Wages are already 1/3 of what they should be, jobs are dangerous and we do

			not need the skilled labor trades flooded with unskilled, untrained people.
Amberle Wright	No	Unclear	More time is needed for discussions between the parties proposing and those affected.
Bradley S. Austin, Training Coordinator/Instructor, Plumbers & Pipefitters	No	Unclear	Would like more time and input from stakeholders such as Industry Reps, Training Providers, and Individuals interested in or already involved.
Sean Colette	No	Unclear	This would make jobs very unsafe and would put me and my coworkers in harms way.
Jasen Johansen	No	Unclear	Please value my safety and my life and don't pass it.
James Yuill	No	Unclear	These changes will lead to an unskilled and unsafe workforce here in Alaska and should not be implemented by any means.
Oliver Goard	No	Unclear	Deregulating these apprenticeships and licensing requirements will only hurt the state and the lives of these skilled craftsmen.
Keith Dunn	No	Unclear	Resend message by Gary Brooks.
Devon Teeling	No	Against*	Having 10 apprentice to 1 journeyman is so unsafe and can hurt or kill someone on the job site or people around the area.
Crystal Enkvist, Executive Director, Alaska Power Association	No	Unclear	Requests the department conduct further discussions.
Larry Emerton	No	Unclear	I have some concerns about the changes in licensing and ratio of trainees to journeymen.
Jim Sampson	No	Against*	I oppose the department's proposed regulation changes to electrical and plumbing licenses and the addition of a new section for a student trainee fitness license with a ten to one job site ratio.
Stephen Hennessey	No	Against*	The proposal to remove requirements for Electrical and Plumbing Apprenticeships. I strongly oppose this action.
Charlee Ruhl	No	Against*	Several concerns. To think that a young person, perhaps right out of high school, may be essentially unsupervised, with the proposed <u>1:10</u> ratio, is horrifying.
Gary R. Griffith	No	Unclear	I strongly disagree with the new proposed changes. It seems to short cut the safety practices that get passed on under the direct supervision of skilled trained journeyman.
Jordan Daniel Thies	No	Unclear	Removing the requirement for training programs and Certificate of Fitness is a

			definite hazard to workers in the Electrical and Plumbing fields, and a definite hazard to the public at large due to a lack of knowledge in the construction industry.
Mary Corcoran	Yes (received after the deadline)	Against*	Has several concerns. Who will police all aspects in terms of compliance?
Greg Bierma	No	Against*	I firmly believe that to enact these regulations will be dangerous for everyone, from the workers who install electrical and plumbing systems to the ordinary citizens who end up using those systems.
Corde Koonz	No	Against*	The proposed changes to the ratio of journeyman to apprentices from 1:1 to 10:1, will do nothing but hurt the on the job training apprentices will receive from the journeyman.
Florie Travline	No	Unclear	Wages and safety concerns.
Zachary McGee	No	Unclear	The proposed changes to apprenticeship programs in the state in my opinion would be detrimental to the development of skilled workers in our state.
Ann Lindsey, President Lindsey Consulting	No	Unclear	Several concerns. Highly recommend state withdraw to allow open discussion.
Kris Van Flein	No	Unclear	This is essentially government trading cheap labor for the quality of life and potential livelihood of your Alaskan workforce. on behalf of the labor force of Alaska, do not impose these changes.
Dalton Desrochers	No	Unclear	Several concerns. By making this new regulation and bringing unskilled labor in to take away the jobs of very skilled labor just to save money is pointless!
Casey E. Sullivan	No	Support 8 AAC 80.110(c)	Only commenting on the support for API pressure relief testing valve standard.
Eric Ghegan	No	Against	I would like to voice my disapproval for the apprenticeship changes that are coming to the state of Alaska. The 1-10 ratio is very dangerous because a single person simply cannot educate and make sure 10 apprentices are staying active and safe with electricity.
Austin Deehan	No	Against*	The 10 to 1 ratio is unacceptable and extraordinary unsafe.
Jake Elliott	No	Against*	Several concerns. I read through the proposed changes and having 1 Journeyman responsible for 10 Apprentices makes absolutely no sense,

			it would eliminate on the job training and performance.
JoAnna Schneider	No	Against	Several concerns. I am writing to oppose the changes to the plumbing and electrical regulations that change the ratio of apprentices to Journeyworkers.
Dax MacMillan	No	Unclear	The apprentice to journeyman ratio changes would create more problems than it would solve. One journeyman, especially lineman, cannot be watching 10 apprentices.
Matthew Wallace	No	Against*	Nothing is more important than the welfare of each worker on a job site. These proposed changes would allow an increase from one apprentice per journeyman to ten!
Demond Simmons	No	Unclear	Please do not take this great opportunity away from people who are motivated to learn the safety and invest a great deal of five years to this JATC!
Calvin Bell	No	Unclear	I feel it would be very dangerous to have a one journeyman with ten apprentices, there would be no time to supervise and instruct on how to do the job safely and efficiently without endangering themselves and anyone else around or near the job that is being done.
Sean Herring	Yes (received after the deadline)	Unclear	If we change the whole apprenticeship now, what will happen to my family and I. What will happen to our safety net? How can you help us make it home to our kids. Please reconsider this change and renegotiate for a stronger safety for our trade. Please!
Jake Metcalfe, Executive Director, ASEA/AFSCME Local 52	No	Unclear	Several concerns, <i>see</i> letter.
Randy Golding, Business Manager, Sheet Metal Workers Local 23	No	Against	Several concernns, <i>see</i> letter.
Heidi Drygas, General Counsel, United Association of Plumbers, Steamfillers & Pipefitters	No	Against*	<i>See</i> letter. Several concerns and oppositions.
Shufler	No	Unclear	You might call it “right-to-work to death”
Rachel Mulvihill	No	Unclear	I would like to to express my opposition to the proposed changes to the electrical and plumbing licensing regulations.

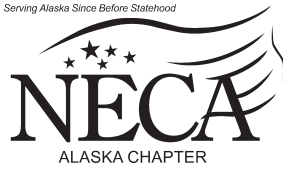
Stephanie Meek	No	Unclear	These regulations significantly increase the risk of on-the-job deaths and serious injuries on a wide range of projects. There is a reason the ratios are set the way they are and that their apprenticeship training program is as rigorous as it is.
Juston Strike	No	Against*	My trade continues to grow with today technology and being able to have one on one job training with a journeyman helped me develop skills needed to succeed in my career.
Ryan Newbury	No	Against	One of my concerns is the proposed 10:1 apprenticeship to journeyman ratio.
Patrick N. Bergt, Regulatory and Legal Affairs Manager, AOGA	No	Support to 8 AAC 80.110(c)	Only commenting on 8 AAC 80.110(c).

Telephone calls received voicing opposition (*comments vis phone were not an option*):

Delores Joanne Scott
Brian Trent Beal

Opposed: 176
(*safety was a major concern: 125)
Unclear: 172
Support: 2 for 8 AAC 80.110(c) only

ALASKA JOINT ELECTRICAL APPRENTICESHIP AND TRAINING TRUST



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January 13, 2020

Commissioner Ledbetter:

I am writing to you as the director of the largest electrical apprenticeship training program in Alaska, as a person who has spent the majority of my adult life in the electrical industry, as a former director of the department's Labor Standards and Safety Division, and as a lifelong Alaskan with a deep commitment to the state's present and future vitality. Through my firsthand knowledge and experience with the electrical and plumbing trades, the utility and construction industries, and from my discussions with a wide variety of stakeholders, I can say that the proposed changes to certificates of fitness will have a deeply negative impact on our skilled plumbing and electrical industries. The most pronounced negative impact will be on the core workforce whose collective competence grants us trust in our infrastructure, our homes, hospitals, and power plants, and allows everyday Alaskan's the ability to live and go to work without worrying about the dangers that shoddy electrical and plumbing work can pose. The current proposal should be withdrawn, and the department should actively engage stakeholders to build effective regulations, and to enhance work opportunities in these industries.

The proposed changes will result in a weakening of the robust workforce development institutions currently in place for these critical trades. This proposal creates bidding advantages for employers choosing not to utilize apprenticeship, despite the department's historical support for this nationally-recognized pathway for developing a competent workforce. The biggest potential bidding advantage would go to those employers partnering with public education programs, despite the reality that no public education programs in Alaska produce qualified electrical or plumber journeymen. The proposal would eliminate the training requirements that support the statutory intent for these licenses - to ensure that our skilled plumbers and electrical workers actually know what they're doing. In the case of our most hazardous trade, the lineman first responders who restore power when disaster strikes, this proposal appears to eliminate standards for competency altogether. By eliminating any meaningful training component from trainee licenses, and increasing the hours required before potential journeymanhood, this proposal allows and encourages the use of seasonal out-of-state cheap labor in place of training Alaskans for success. Without support for the critical Alaskan training programs, we lose the ability, as a state, to facilitate competence in the workplace, and protect the health and safety of Alaskans.

This letter is not intended to provide technical criticism or suggestions for improvement. Instead, it is a plea for the department to engage in a public process. It is clear from my discussions with stakeholders that the department has not consulted with representatives from the affected industries. A meaningful discussion with employers, training organizations, unions, inspectors, and safety experts will help the department develop effective improvements to these regulations, avoiding an unfortunate morass of unintended consequences. Fortunately, at this point, nothing has yet been set in stone.

It is critically important to engage the people who are affected directly by these regulations. Talk with the public and workplace safety experts who understand the importance of competence in electrical and plumbing work. Engage the hardworking men and women who understand life in these skilled trades, and those who could lose opportunities if career pathways are turned into dead ends. Speak with the businesses: the public and private utilities, the contractors, and the homebuilders whose lifeblood is the skilled workforce fostered by apprenticeship. Consult with the organizations that work tirelessly to train hundreds of Alaskans yearly to work safely and effectively in our electrical and plumbing industries.

As we mourn the loss of labor commissioner and Alaskan legend Tom Cashen, his admonition echoes in our minds. "Alaska shouldn't be a chickenshit place to work." We should all remember these words as we work to build Alaska's future. Sweeping changes such as these should not be developed in darkness. The state should engage with Alaskans to improve the systems that keep our state a safe and healthy place to work and live.

I look forward to strengthening our relationship with your department as we develop our state's skilled workforce. Please do not hesitate to reach out to me at any time.

Sincerely,



Deborah Kelly
Director, Alaska Joint Electrical Apprenticeship and Training Trust

Becky Weimer
Department of Labor and Workforce Development,
Labor Standards and Safety
P.O. Box 111149, Juneau, AK 99811-1149.

To whom it may concern:

The Operating Engineers represent nearly 3000 members in Alaska and at any given time we have well over one hundred and twenty (120) apprentices working for our signatory employers across the state. I appreciate the opportunity to be able to provide testimony in opposition to the regulation changes being considered regarding Title 8 of the Alaska Administrative Code.

The single provision I wish to discuss today is a disturbing mandate by the State of Alaska that would allow ten(10) apprentices (or "student trainees") to one(1) journeyperson on the job. This is wrong on so many different levels, but at a minimum we felt the need to provide reasons against it based on the integrity of the training being provided, the safety of the program being provided, and lastly the quality of the work being performed.

For starters, Local 302's training program(ran by a non-profit trust)is NOT affected by shortfalls in state budgets. This is very much unlike AVTEC, as we know they are cutting curriculum and hours because of a lack of state funding. The high standards and integrity of Local 302's program are not compromised because of a shortage of funding. This issue that the state has created with this re-write is a major problem, as training for a future workforce should never be impacted by state budgets. This is totally unfair and unacceptable to any trainee when a budget could be severely detrimental to their training program.

From a safety standpoint, it is difficult to believe that the state would find it acceptable that one (1) journeyman could oversee ten (10) trainees. Our apprentices range from 50-95% efficiency. So, they might need constant supervision or guidance to keep them safe. How in the world can one (1) journeyman oversee ten (10) other people in training, safely? I feel that this move alone could reverse the trends of serious accidents and deaths in the construction industry in Alaska. Safety should never be compromised, but I clearly fear this provision would do just that.

Lastly, the quality of work needs to be discussed with regards to this new vision for training workers. Workforce development in Alaska should continue to be a high priority for the future, but this one (1) in ten (10) concept does not make any sense. The Operating Engineers allow one (1) journeyman to every five (5) apprentices. Allowing ten (10) to one (1) would severely dilute the apprentice to journeyman ratio and would surely result in the quality of work being performed to be compromised as well. We owe it to the residents, the State, and the new trainee to provide a high-quality product and service while engaged in the training for their future career. Everyone should be able to agree that these new

trainees/apprentices might not be as efficient as a journeyman, but the job should be done correctly and the quality of work should still be held to an acceptable craft standard.

In summary, we feel due to the lack of oversight alone that the new regulations should not be adopted. We owe it to the apprentice/trainee to make sure the integrity of the program is very high, that the safety of the program will not be compromised in any way, and that the quality of the work in the end that they perform is to a high professional standard. If and only if we do it this way, can we say to our self that this program was fair to the apprentice/trainee, the trade they represent, and the State of Alaska.

Thanks again for the opportunity to provide written feedback on the proposed regulation changes.

Sincerely,

Jason Alward
Local 302, Operating Engineers

Dr. Tamika L. Ledbetter,

I am writing to the great concern I have over the recent proposed regulation changes the Alaska DOL is seeking to make regarding apprenticeship standards and licensing requirements for both the Electrical and Plumbing industry. I personally have over 18 years of experience in the Electrical industry here in Alaska. I attended my apprenticeship here in Fairbanks and completed the 8,000 hours along with 1600 hours of classroom time. I have been involved with the apprenticeship process at our school for the past 8 years. I feel that the state's current standards should be the minimum for training quality craft personal. I have seen hundreds of apprentices go through the current apprenticeship process and turn into knowledgeable and capable Journeyman that perform electrical installations in a safe and professional manner. The federal standards require a 1:1 Journeyman to apprentice ratio and the state currently does a 1:2 ratio which is already below the federal standards. Now you want to go to a 1:10 ratio. This is not safe let alone the apprentice does not get any quality training. I am not sure if you have seen any safety videos from electrocution? Let me tell you they are not fun to see what happens. What you are doing is exposing untrained people to a hazard of electrocution when you have that high of ratio. What other states allow this high of a ratio? What are your reasons for allowing this high of a ratio? You are now proposing doing away with the current Certificate of fitness and going to some type of training program. This will allow just any person to enter in as a trainee and will not be required to meet standards or proper training. Electricians are supposed to be trained in the National Electrical Code and understand what it means and how to install electrical components properly and safely. If electrical components are not installed properly people get electrocuted, buildings and homes will burn down. How will you insure that people have been given the proper training and understand the Code with your new proposed changes? The current system that Alaska DOL has for becoming a Journeyman electrician has been the standard around the Nation and has been proven to work. I urge you to leave the current system the same and not go forward with the proposed changes. We should be working to improve our current system for Electricians and plumbers, not lowering the standards which will cause the loss of Alaskan lives.

Sincerely,



Walter Robinson

Nenana Alaska



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STANDARD FOR EXCELLENCE

January 9, 2020

Dr. Tamika Ledbetter, Commissioner
Department of Labor and Workforce Development
P.O. Box 111149
Juneau, Alaska 99811

[Via Electronic Mail]

Re: Proposed changes to Title 8 of the Alaska Administrative Code eliminating apprenticeship standards for plumbing and electrical trades

Commissioner Ledbetter:

As the Business Manager of Alaska's largest union of Plumbers & Pipefitters, and a proud graduate of our registered apprenticeship program, I am deeply concerned about the changes the Department proposes to Title 8 of the Alaska Administrative Code. In short, these proposed changes will be harmful to the public and Alaska's workers, and will negatively impact our ability to grow a skilled workforce in Alaska. Our concerns with these proposed regulations lie with the elimination of apprenticeship requirements for plumbing and electrical trainees, the elimination of training requirements for journey worker licenses, and trainee-to-journey worker ratios that shock the conscience.

First, the proposed regulations eliminate the apprenticeship requirement from plumbing and electrical trainee licenses. If these regulations are enacted, a worker need only pay a fee to the department to receive a license. In other words, there is no requirement that the worker be enrolled in a training program. This is an exceptionally dangerous idea for workers about to be employed in a highly hazardous industry like residential, commercial, or industrial construction projects with literally no experience or training.

Second, as drafted, it is entirely possible and predicable that the Department will fully license electricians, linemen and plumbers with no skill or knowledge in their field under the proposed regulations. By removing the training requirement, a worker could spend their time as a trainee performing any task at all, and after 12,000 hours receive a full journeyman license. Whether it was sweeping up after the pipefitters performing their work, taking out the trash, or performing a single simple task over and over, the worker would qualify for a full license. After 6 years on the job, is a flight attendant ready to fly the plane? After 12,000 hours, is the surgical assistant ready to perform the procedure on your heart? Of course not. There is specific

training and curriculum necessary for every skilled occupation, and the skilled trades are no different. Further, it's imperative that the Department respect the highly skilled work of our tradesmen and tradeswomen because the Alaska public deserves no less. When the work suffers, people's lives are put at risk.

Third, the Department proposes a new "student trainee" license, which would allow a 10:1 trainee to journey worker ratio. I am aware of no other state that allows such a ratio, and for good reason. It's simply unthinkable, and had the department consulted anyone in either the construction industry or organized labor prior to proposing such regulations, I suspect this would have been amended. The reason is straightforward: construction workers experience injuries and fatalities at a rate higher than the national average. It's the reason apprenticeship programs allow for a maximum 1:1 ratio. One of the tenets of the Alaska Department of Labor is to keep workers safe, but this proposed regulation will do the opposite.

In addition to the above concerns, these regulations with significantly and negatively impact our efforts to recruit and train veterans in the pipe trades. Our nationally-recognized Veterans in Piping (VIP) program has placed thousands of returning veterans to work in our apprenticeship programs across the country. Here in Alaska, our VIP program has been hugely successful to ensuring that veterans gain transferable skills and find meaningful careers after military service. These regulations, however, threaten to gut registered apprenticeship programs for electrical and plumbing trades, putting this important veteran's program at risk.

With proposed changes so drastic, and consequences so severe, I am unsure if the Department itself is aware of the true impact these regulations will have on Alaska's workforce training programs. I'm also concerned that the Department did not reach out to key stakeholders prior to drafting such important changes to our regulatory framework. I urge the department to withdraw these regulations, meet with affected stakeholders, and work towards a solution that will benefit workers, industry, and our workforce training programs, and most importantly—keep Alaskans safe.

Sincerely,



Aaron Plikat
Business Manager
United Association of Plumbers & Pipefitters Local 367



January 13, 2020

Dr. Tamika L. Ledbetter, Commissioner
Alaska Department of Labor and Workforce Development
P.O. Box 11149
Juneau, AK 99811

RE: Notice of Proposed Regulations – Mechanical Inspection

Dear Commissioner Ledbetter,

We are writing to express our concerns regarding the proposed changes in plumbing and electrical regulations brought forward by the Alaska Department of Labor and Workforce Development. This proposal will negatively impact workforce development within the State of Alaska as well as significantly increase safety hazards and risks unnecessarily.

Associated Builders and Contractors of Alaska (ABC of AK) has communicated with our members, businesses and other trade associations about the proposed regulation changes. Several of our concerns align with the NECA/IBEW apprenticeship program. Together we train hundreds of Alaskans each year to become skilled tradespeople. Where we are often fierce competitors and have differing opinions on many political fronts, we agree that this proposal is damaging to workforce development, and unsafe for Alaskans.

Apprenticeships are recognized nationwide as providing quality knowledge and experience so that workers can build safe, reliable infrastructure. The proposed change to eliminate the “apprenticeship” requirement from licensure and remove the requirement that trainees receive any training curriculum will only undermine the quality of work performed in Alaska. Allowing for 12,000 hours of work in a related field does not equal the current requirements of 8,000 hours of diverse on the job training and curriculum-based studies. A framework for ensuring the diversity of on the job training and curriculum understanding still needs to remain.

The devaluation of training is disheartening from a department which has always supported career and technical education as a meaningful alternative to college. By removing any employer commitment to training or development, the trainee license becomes inconsequential. This will allow employers not invested in the apprenticeship structure to underbid contractors who commit to and believe in the apprenticeship process. The proposed regulations would greatly diminish the investment into our workforce development system and the overall strength of skilled workers available for Alaska’s business owners.

ABC of Alaska believes strong apprenticeship programs are critical to sustaining Alaska’s skilled workforce. We believe the proposed regulations will endanger public safety, worker safety, and will reduce the availability of skilled electrical and plumbing workers. Where there may be good intention behind the proposed regulation for a student trainee certificate, there is a large concern for the lack of definition surrounding the addition to the regulation. The department’s proposal to allow a 10:1

and potentially public safety. There simply needs to be clearer definition, understanding and parameters put forth before this proposal is accepted.

ABC of Alaska respectfully and urgently requests the proposed regulation change be withdrawn in order for the department to engage with stakeholders in an open dialogue about the overall intent to change the regulations. By not allowing for some sort of discourse, we strongly feel this change as written, has far reaching unintended consequences and will result in a negative impact on the effected trades.

Thank you,



Amber M. Cartier
Director of Apprenticeship
Associated Builders and Contractors of Alaska



Amy Nibert
President
Associated Builders and Contractors of Alaska



Greg Roads
Board Chair
Associated Builders and Contractors of Alaska



Ms. Weimer,

ABC of Alaska submits the following questions regarding the proposed regulations changes to 8AAC 63-8 AAC 90:

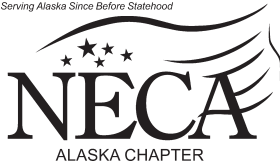
1. How will oversight be provided to companies not registered as or with a sponsoring apprenticeship program for the ratio requirements?
2. Who will regulate the safety standards for those companies not registered as apprenticeship programs? Apprenticeship programs/companies are required to provide safety training to apprentices as part of their standards. How will companies not adhering to apprenticeship standards be accountable for the safety requirements of the hazardous trades you are suggesting to change?
3. How will potential apprentices be given the information on joining an apprenticeship/union vs. no and important information on tracking their hours towards completion?
4. Will trainees be able to provide combined earned hours to Mechanical Inspections and sit for their exam? (Example: 4000 from non-apprenticeship hours and 4000 from an apprenticeship program.)
5. How will the DOL be able to regulate the “student trainees” outside of their classroom time? If a person has a student trainee card will they be able to work during summer hours for any company and earn hours towards their journeyman’s card? Who will make sure said students are not abusing this during non-school hours?
6. How will any hours worked by student trainees be accounted for? Will they all be toward their 1000 related instruction or will the time be split into OJT and related instruction?
7. If the change is to help with people bringing in hours from out of state locations why not have a change specific for reciprocity vs. changing the requirements and making them confusing for Alaskan residents.
8. Will the DOL have to approve a company as an OJT program prior to people participating and getting a certificate of fitness?
9. If so how will the DOL approve those programs?

10. If approval is necessary what will be required to be approved by the DOL? Will the DOL audit the programs
11. What safeguards will be in place to ensure it is a bonafide program and not just a way to hire cheap labor?
12. In the FAQ section – the answer on ratio of 10-1 did not adequately address safety or quality of education. It does not matter if one is paid or attending school. The work should be the same if they are learning the same trade. Why is it safe and how can it be quality education if 10-1?

Regards,
ABC of Alaska

ALASKA JOINT ELECTRICAL APPRENTICESHIP AND TRAINING TRUST

Serving Alaska Since Before Statehood



DEBORAH KELLY
Statewide Training Director
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TIM BRANNAN
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Kornfeind Training Center
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January 13, 2020

Commissioner Ledbetter:

This letter is in addition to the AJEATT's previously submitted comment.

The IBEW/NECA apprenticeship and the Associated Builders and Contractors, Inc. apprenticeship are usually fierce competitors. We each work to capture promising talent to develop into skilled journeymen who will contribute to the success of our employers. In this instance, however, we come together to ask the department to withdraw its currently proposed changes to electrical and plumbing certificates of fitness.

Despite our differences, NECA/IBEW and ABC agree that strong apprenticeship programs are critical to sustaining Alaska's skilled workforce. We believe that the proposed regulations would negatively impact quality workforce development, public safety, and worker safety statewide.

We ask that the department withdraw its proposal and open a dialogue with stakeholders to determine the best path forward that will benefit our businesses, workers and the public.

Sincerely,

A handwritten signature in blue ink, appearing to read "D Kelly", is written over a faint outline of the state of Alaska.

Deborah Kelly
Director, Alaska Joint Electrical Apprenticeship and Training Trust

Alaska State Legislature



January 9, 2020

Commissioner Tamika Ledbetter
Alaska Department of Labor and Workforce Development
P.O. Box 111149
Juneau, Alaska 99811

Transmitted via email

Re: Proposed student trainee certificate of fitness regulations

Dear Commissioner Ledbetter:

We members of the Alaska State Senate have concerns about the creation of a new student trainee certificate of fitness program that was part of a December 4, 2019, proposal by the Alaska Department of Labor and Workforce Development to change regulations in Title 8 of the Alaska Administrative Code relating to the uniform plumbing code, the safety code for elevators and escalators, the boiler and pressure vessel code, and API pressure relief testing valve standards.

The possibility of having a new student trainee certificate of fitness program has generated a myriad of questions from our constituents as well as mechanical and electrical contractors, both union and non-union, as to what this plan is trying to accomplish.

We respectfully request that the department break its December 4, 2019, proposal into two regulatory packages: one dealing with code changes and the other focused solely on a standalone student trainee certificate of fitness program. We ask that your agency then start a new, 30-day comment period on the latter.

We also encourage the department to hold stakeholder meetings and educate legislators and the public about the proposed trainee program.

Finally, we urge you to present this proposal to the Alaska Workforce Investment Board and ask that panel to weigh in on it.

Thank you.

Handwritten signature of Senator Click Bishop in black ink.

Senator Click Bishop

Handwritten signature of Senator John Coghill in black ink.

Senator John Coghill

Handwritten signature of Senator Cathy Giessel in black ink.

Senator Cathy Giessel

Handwritten signature of Senator Bert Stedman in blue ink.

Senator Bert Stedman

Handwritten signature of Senator Gary Stevens in blue ink.

Senator Gary Stevens

Handwritten signature of Senator Natasha von Imhof in black ink.

Senator Natasha von Imhof

cc: Suzanne Cunningham, Legislative Director, Office of the Governor
Cathy Muñoz, Deputy Commissioner, Alaska Department of Labor and Workforce Development
Becky Weimer, Regulations Specialist, Alaska Labor Standards and Safety Division



Alaska Power Association
703 West Tudor Road, Suite 200
Anchorage, Alaska 99503-6650
(907) 771-5700
Fax: (907) 561-5547
www.alaskapower.org

January 13, 2020

Alaska Department of Labor and Workforce Development
Labor Standards and Safety Division
Attention: Becky Weimer
Via Electronic Mail: becky.weimer@alaska.gov

Subject: Alaska Power Association's Comments on Proposed Changes to the
Power Linemen Certificate of Fitness Regulations

Dear Ms. Weimer:

The Alaska Department of Labor and Workforce Development ("Department") has proposed to amend the regulations regarding certificates of fitness for plumbers, electricians and power linemen. The following are the Alaska Power Association ("APA") comments on the proposed amendments to the certificate of fitness for power linemen.

APA was organized in 1952 as a trade organization to advance the common goals of Alaska electric cooperatives and today is the association for Alaska's electric industry. APA's members are electric cooperatives, municipal utilities and investor-owned utilities. APA's members serve the vast majority of electric utility customers in the State of Alaska, maintaining more than 9,000 miles of electrical distribution lines and employing hundreds of Alaskans, including many power linemen.

Safety is a primary concern for APA and its members. APA maintains a standing safety committee for oversight of electrical industry safety issues. APA provides safety training to its membership and ARECA Insurance Exchange, APA's sister company, provides workers' compensation insurance and other insurance coverages for many APA members. APA and its membership have a wider exposure to the electric utility industry and the complexities of providing economical service to electric customers than any other public or private agency in the State of Alaska.

It goes without saying that working with electrical voltage is hazardous to the health of individuals and personnel who are untrained and otherwise unqualified to perform electrical work. APA believes that a certification process is appropriate and necessary to

further the State's legitimate interest in the public health and safety. In other words, APA believes it is appropriate for the State of Alaska to require proof of qualifications to perform certain levels of electrical work.

APA appreciates the Department's recognition that the certificate of fitness program needs to be reformed. APA and many of our members believe that reforms are needed. However, APA also believes that there has not been sufficient time and opportunity for discussion among the stakeholders as to what those reforms should consist of and the costs and benefits of the various reform options. APA would like to see the Department convene a working group of labor, utility, contractor and government representatives to comprehensively review the current system and identify potential solutions. APA would be engaged in this process and is offering to assist with pulling the interested parties together and providing any other assistance it can with such discussions.

As a result, APA is asking the Department to take the lead in conducting further discussions among all of the impacted stakeholders on this important issue. After considering the input and opinions from all interested parties, the Department will be in a better position to evaluate the reforms needed to the certificate of fitness rules for power linemen.

Sincerely,

ALASKA POWER ASSOCIATION



Crystal Enkvist
Executive Director

cc: Governor Mike Dunleavy



12JAN2020

To: Alaska Department of Labor and Workforce Development

SUBJECT: The Alaska Safety Advisory Council (ASAC) has become aware of The Department of Labor and Workforce Development proposed adoption of regulatory changes in Title 8 of the Alaska Administrative Code, dated: 4DEC2019.

PURPOSE: These proposed changes came out on December 4, 2019 and the public comments close on January 13, 2020. The ASAC is formally requesting a ‘Withdraw’ of the proposed regulation changes listed out below, to allow Stakeholders the ability to meet with the proposing entities and weigh in on this proposal and potential consequences of its enactment.

THE PROPOSED REGULATIONS FOR CHANGE: Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development.

- 8 AAC 63.010, 8 AAC 80.010, 8 AAC 90.130-8 AAC 90.165 and 8 AAC 90.900 are proposed to be repealed and readopted to reorganize existing material; adopt current versions of uniform codes; clarify existing language; update methods; remove examination requirement for power linemen; and eliminate the apprenticeship registration requirement for plumbing and electrical trainees.
- 8 AAC 77.005, 8 AAC 80.060(b), 8 AAC 80.070(a), 8 AAC 80.110, 8 AAC 80.130, 8 AAC 80.900 and 8 AAC 90 are proposed to be amended to clarify existing language; adopt versions of uniform codes; adopt the API pressure relief testing valve standard; add new subsection relating to testing and inspection program; and add new section and Article on student trainee certificate of fitness.
- 8 AAC 90.162(b)(1) was deleted

All members of the ASAC are appointed by the Governor in office at the time their appointment was made. Each member holds a seat representing sectors of industry, labor, state, federal, and the public. The ASAC has a mission to protect the safety of all Alaskans.



VOTING STATUS:

#	Appointed Council Member	Vote Status:
1	Bauke, Leischen	Absent
2	Cunard, Samuel	Approved
3	Danger, Nick	Not Approved
4	Galloway, Philip	Absent
5	Harlan, William	Abstained
6	Knowles, Joseph	Abstained
7	Lindsey, Ann	Approved
8	Murray, George	Approved
9	Nichols, Brannon	Approved
10	Porter, Nickole	Absent
11	Raygor, Scott	Absent
12	Roberts, Anneliese	Absent
13	Vidrine, Grant	Approved

**This memorandum was approved by the ASAC Council on January 10, 2020 by a vote of:
For 5; Against 1; Abstained 2.**

The POC for this memorandum is George Murray, appointed member of the ASAC | Phone #:
907- 465-4855.

We, the ASAC, request to be kept informed on the status of these proposed regulation changes.

With Regards,

A handwritten signature in black ink that reads "Ann Lindsey".

Ann Lindsey, CSP, CIT
ASAC Chair
The Alaska Safety Advisory Council (ASAC)
Department of Labor & Workforce Development



ALASKA STATE EMPLOYEES ASSOCIATION

American Federation of State, County & Municipal Employees Local 52

Department of Labor and Workforce Development
Labor Standards and Safety
P.O. Box 111149
Juneau, AK 99811-1149
dol.lss.regulations@alaska.gov

January 13, 2020

RE: ASEA/AFSCME Local 52 comment opposing AK DOLWD's proposed regulations to eliminate apprenticeship standards for electrical and plumbing occupations in Title 8 of the Alaska Administrative Code

Dear Commissioner Ledbetter:

I am writing to oppose the Department of Labor and Workforce Development's proposed regulations to eliminate apprenticeship standards for electrical and plumbing occupations under the purview of Mechanical Inspection. This move is dangerous. Alaska already leads the nation in job fatality rates ([AFL-CIO Death on the Job report](#)). We must ensure that we are always working towards lowering this rate, not increasing it. The most recent published report showed that 10.2 out of 100,000 workers (compared to the national rate of 3.5) died on the job in 2017. That means 33 people went to work in Alaska, expecting to come home, and didn't. We know that one death on the job is one too many.

It is important for me, as the Executive Director of the largest public employee union in Alaska, and largest union overall, to stress the unnecessary risk this would bring to my members and the public. Our members work everywhere Alaska needs us – in a land that is already home to extreme and dynamic environments. We don't need to help disaster along by removing important programs that stress safety and yield qualified tradesmen and tradeswomen. The 7.0 earthquake on November 30, 2018 resulted in zero lives lost. That wasn't due to relaxed building codes or regulations but because of them.

Alaska only has 22 inspectors responsible for nearly 22,000 workplaces employing over 300,000 workers (as of 2019 figures). The Safety and Health Report conducted by the AFL-CIO showed that it would take 77 years to inspect each workplace. This situation calls for vigilance around safety at all worksites which means making sure that each working person has the training and skills necessary to keep themselves and those around them, safe.

Removing these regulations not only jeopardizes health and safety but erodes an important employment pathway for our veterans by interfering with important nationwide programs for veterans via the Veterans Electrical Entry Program (VEEP) and Veterans in Piping (VIP) program. Compared to other states, Alaska has the highest population density of veterans. It's important that we continue to emphasize and prioritize important programs like VEEP and VIP to give back to the people that have risked their lives in serving their country.

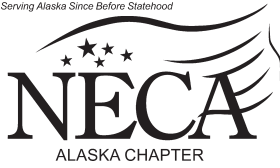
For all of these reasons, I am opposed to this regulation proposal and hope that it is not adopted.

Respectfully,

Jake Metcalfe
Executive Director
ASEA/AFSCME Local 52

ALASKA JOINT ELECTRICAL APPRENTICESHIP AND TRAINING TRUST

Serving Alaska Since Before Statehood



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Statewide Training Director
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TIM BRANNAN
Training Coordinator
Kornfeind Training Center
4782 Dale Road
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Tel: (907) 479-4449
Fax: (907) 479-0425



Ms. Weimer:

We submit the following questions regarding the proposed regulations changes to 8 AAC 63 – 8 AAC 90:

1. How did the department arrive at a permissible ratio of 10 student trainees to 1 journeyman for electrical and plumbing construction work? (8 AAC 90.300(c))
2. Why is the department diverging further from the USDOL Office of Apprenticeship's 1 trainee to 1 journeyman ratio, which is based on its conclusion that it 1 to 1 is the maximum ratio that protects trainee safety in high-hazard industries such as plumbing and electrical construction?
3. Under the proposed regulations, what is the purpose of the trainee certificates of fitness and associated \$250 fee? (8 AAC 90.140 and 8 AAC 90.165)
4. Why is the proposed trainee ratio different depending on whether the training program is public ("student trainee") or private ("trainee")?
5. Why is the department proposing to provide a competitive advantage through more permissive ratios (10 lower-cost trainees to 1 journeyman vs. 2 lower-cost trainees to 1 journeyman) to publicly administered programs such as Job Corps and AVTEC over privately administered apprenticeship and training programs?
6. What is department's reason for proposing to allow the commissioner to waive fees for "student trainee" certificates of fitness but not for "trainee" certificate of fitness?
7. Does the department consider it practical for a student trainee to perform electrical or plumbing construction work "under the direct supervision of a journeyman certificate of fitness holder" as required by the proposed 8 AAC 90.300(2)(A) when there are 10 student trainees to every journeyman?
8. Is the proposed definition of "electrical wiring" intended to cover work performed under the National Electrical Safety Code? (8 AAC 90.900(10))
9. Under the proposed changes to 8 AAC 90.900(10) and (16), what definition of "heavy equipment" will the department use to determine which tools used to perform electrical or plumbing installations will require a certificate of fitness vs. not require one?
For example:
 - i. Would a "jumping jack" style compactor be considered heavy equipment?
 - ii. Would a walk-behind self-propelled compactor be considered heavy equipment?
 - iii. Would a ride-on-top compactor be considered heavy equipment?

10. Under the proposed definition of "heavy equipment", which of the following tasks would no longer require a lineman certificate of fitness? (8 AAC 90.900(10))
 - a. Operating heavy wire-pulling and tensioning equipment to install high voltage overhead lines
 - b. Operating heavy wire-pulling equipment to install underground electrical lines
 - c. Operating a crane or boom truck to "hot inset" a pole or structure into energized high voltage lines
 - d. Operating a boom truck with insulated components to move energized high voltage lines in and out of position
 - e. Operating a crane with man basket to position workers in the work zone to perform energized work on high voltage lines

11. Does the student certificate of fitness require that all work be inspected, or only that the program agree to allow inspection? (8 AAC 90.300(b)(2)(C))

12. How does the agreement to allow inspection (proposed 8 AAC 90.300(b)(2)(C)) differ from current electrical and plumbing inspection statutes and regulations?

We appreciate a prompt response to allow for review and public comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D Kelly', with a stylized flourish.

Deborah Kelly
Statewide Training Director
Alaska Joint Electrical Apprenticeship and Training Trust

International Brotherhood of Electrical Workers

Local 1547

3333 DENALI STREET, SUITE 200
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(907) 272-6571 (907) 276-1547 (907) 777-7255

DAVE REAVES
BUSINESS MANAGER • FINANCIAL SECRETARY

KNUTE ANDERSON
PRESIDENT



January 13, 2020

Re: Public Comment - Department of Labor Workforce Development - Proposed Regulation Changes to Title 8 of the Alaska Administrative Code

To whom it may concern,

Back in the late 1800's, as the second industrial revolution was bringing about the rapid expansion of electricity to businesses and homes, 1 in every 2 electrical workers were killed on the job due to a lack of safety and training while working in this extremely hazardous occupation. That is why our organization, the International Brotherhood of Electrical Workers, was founded by our first President Henry Miller, who was a lineman. Henry Miller spent his life organizing electrical workers and improving safety and training but was tragically killed on the job in an electrical accident. A lot has changed and improved since then for the betterment of all electrical workers, but one thing remains constant; the never-ending goal of improving safety and training to ensure all workers come home safe at the end of each day.

Here in Alaska, Local 1547 of the International Brotherhood of Electrical Workers was chartered on October 1, 1946. By 1958 our Alaska Electrical Apprenticeship Schools were opened with the charge of training future generations of electrical workers with the highest safety and training standards in the world.

Registered Apprenticeship is structured training which is documented throughout an apprentice's career and includes supervision on a 1 journeyman to 1 apprentice level. In this model, apprentices must put in 8,000 hours of work under close supervision on the job and in the classroom with an instructor before becoming a journeyman. Men and women of Alaska who work in the electrical industry are professionals who build a career on building the electrical infrastructure throughout Alaska. They manage our power grid, run oil and gas facilities, electrify airports and hangers, and wire commercial buildings including hospitals, schools, and other public buildings.

IBEW Local 1547 and our apprenticeship program work with everyone from high school students in our School-Business Partnerships, to our transitioning United States military service members in our Veterans Electrical Entry Program (VEEP) which allows them to learn and start a second career before exiting active duty. We make sure the women and men who make up our membership are trained to handle the newest technology while using the best safety methods in the industry. How do we do this? We do this with our labor-management partnership in our Taft-Hartley Apprenticeship Trust which is made up of half labor trustees from around the state and half management trustees which include contractor and utility representatives. These labor and management trustees are experts in the electrical, communication, and tree trimming industries we represent and give us constant feedback on improving current practices and customer needs. Additionally, our apprenticeship instructors receive training yearly with our national apprenticeship program to ensure we keep providing the most up to date and best safety and training in the industry.

After working as a power-lineman in construction and at utilities in Alaska I understand how difficult and dangerous electrical work can be. With Alaska's remote locations and vast geography, the training in safety and skills one has learned are relied on each minute of every day this work is being performed. Doing away with, or weakening that training, by allowing anyone to just pay the State of Alaska \$200 and work 12,000 undocumented hours at a higher ratio of apprentices to journeyman is reckless and a step backward in safety and training. Power line work specifically is consistently listed in OSHA's top ten most hazardous occupations.

Currently the State of Alaska requires anyone who wants to work in the electrical industry to pass and hold a Certificate of Fitness. This is a test of a candidate's knowledge of electrical work regarding safety and specific industry applications. Watering down or eliminating the SOA Certificate of Fitness would be a huge mistake that will cost Alaskan lives and is again a step backward in safety.

The proposed Student Trainee Certificate of Fitness with a 10-1 student-trainee to journeyman ratio is another bad idea that should never be considered on a construction job site. This should only ever be considered in a vocational school setting. The abuse this could bring from an employer in the competitive bidding process, as well as the massive safety concerns, makes one wonder what reasoning there would ever be for such a proposal.

As the Business Manager of IBEW Local 1547 since 2017 and someone who has worked in the electrical industry for over 20 years, I can say with confidence that no one wants to take a step back towards the old days of electrical work when 1 out of every 2 workers were being killed on the job. Sadly, the Dunleavy administration has proposed just that. While we are working hard to bolster new technology, the power grid, our infrastructure and encourage economic development in natural resources, the Dunleavy administration is trying to send us back to a dangerous time.

Alaskan electrical workers do not support these changes and neither do the contractors statewide that hire these workers. Our message is this: do not change and compromise an electrical industry that works hard to provide the highest level of safety and training to skilled workers and that save lives and keeps workers and the public safe. Changing and watering down the apprenticeship model and Certificate of Fitness requirements is not good for business and it is not good for Alaska. Good policy would be meeting with stake holders and industry experts prior to even considering such changes that will have serious negative impacts.

Sincerely,



Dave Reaves
Business Manager
IBEW Local 1547



TCI CONSTRUCTION COMPANY, INC.

3680 Lathrop Street
Fairbanks, AK 99701

Dept of Labor and Workforce Development
Attn: Becky Weimer
dol.lss.regulations@alaska.gov

Mrs. Becky Weimer,

As a collective of multiple mechanical contractors within the interior of Alaska, this letter is in response to the proposed regulation changes dated December 4th, 2019. These proposed changes make us question the quality of future State licensed apprentices and journeyman. Changing or eliminating any of the current apprenticeship requirements will be detrimental to a well-trained Alaskan workforce.

8 AAC 90.140: We do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In our experience, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

8 AAC 90.300: We do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

Accredited apprentice training programs are subject to rigorous standards and are subject to review and approval by the Bureau of Apprenticeship and Training. We hope our vast experience and knowledge in this arena would prove invaluable in the State's decision making.

Sincerely,

Mike McGlinchy
TCI Construction Company, Inc.



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ualocal367.org
STANDARD FOR EXCELLENCE

January 3, 2020

As a plumber/steamfitter of twenty years, with about a year of electrical apprenticeship in the mix, I would like to express my concerns about the currently proposed regulation changes to 8 AAC 63 – 8 AAC 90.

I am extremely concerned about the safety ramifications of removing apprenticeship requirements from these trades. Electrical and plumbing systems can be hazardous, if not fatal, to both the installer and/or end user if not installed properly. Apprenticeships help insure that employees new to these trades are well educated and supervised during the beginning years of their careers. Putting new apprentices through classroom training with a subject matter expert, before their first job, helps the apprentices be aware of hazards and quality issues, as well as helping them to know the basic processes they will be expected to perform. Apprenticeships offer years of training, whereby apprentices are taught specialized installation methods, codes, and safety regulations in great depth, to include: electrical load calculations, fire protection system design, proper sizing and design of plumbing and heating systems, medical gas codes, refrigeration/air conditioning regulations, proper venting of fuel burning equipment and appliances, and the list goes on. All the systems and regulations linked to these trades are directly related to public health/safety, and as such, I do not feel that it would ever be wise to reduce the training required to become a journeyman in these fields.

I am also concerned with the thought of having a ratio of 10 trainees to 1 journeyman. This is a recipe for absolute disaster. From my experiences in the field, I have witnessed how difficult it can be for a qualified foreman to keep track of and assure the quality of work for 10 experienced journeymen, much less 10 unexperienced apprentices. The standards for low apprentice to journeyman ratios have always been to ensure the safety of the apprentice and the quality of the education they receive. Both plumbing and electrical work have extreme hazards involved which make requirements for direct, focused supervision necessary and simply cannot be provided to large groups by one individual. The following are a few examples of situations and systems that could be problematic without proper education and close supervision:

- Without proper training something as simple as installing wiring staples or supports improperly has the potential to burn a structure to the ground, possibly even a long period of time after installation.



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- Installing exhaust piping from fuel burning equipment incorrectly has the potential to introduce carbon monoxide into occupied structures, causing potential for poisoning or even death to occupants.
- Pressure vessels such as water heaters and boilers have enough potential energy stored in them to level a house, should safety systems be installed improperly or not at all.
- Medical gas systems installed in medical clinics, dentist offices, and hospitals (this includes the oxygen and nitrous oxide systems that people breath from) are all installed with extreme care after stringent training. If these systems are not handled and installed properly, there is a strong possibility of system contamination, which could lead to serious infection or even death.
- Structures have great potential to be set ablaze by apprentices using torches improperly in the process of soldering copper piping.

The list of hazardous situations that an apprentice could get into with the equipment used in these trades could fill a book.

In the past, I have seen many safety issues varying from water softener drains being tied directly into waste systems without an air gap (this is a direct connection between your drinking water and a sewage line) to steam generators in power plants being forced to run at pressures in excess of their testing parameters with safeties removed (explosion potential). I replaced a residential boiler in a shop on the Kenai Peninsula, that an unqualified person had plugged the relief valve on, due to the valve leaking. The boiler's temperature high limit control had failed, and the lack of a secondary high limit control allowed the boiler to overheat and over pressure (due to the safety relief valve being plugged) to the point that the boiler room piping came apart violently. It was also found after further inspection of the mechanical room, that the copper piping connections had been very poorly soldered. The poor quality of the solder joints would have over time failed causing possible flooding and/or freezing of the structure.

All of the above-mentioned conditions and much more can be prevented with proper training and supervision. It is negligent and reckless to lower apprenticeship standards.

Respectfully,

Everett Collins
Business Agent

John P. Hakala
P.O. Box 771226
Eagle River, AK 99577

January 10, 2020

Subject: Testimony in opposition to the Alaska Department of Labor and Workforce Development, Division of Labor Standards and Safety proposal to adopt regulation changes in Title 8 of the Alaska Administrative Code

To Whom It May Concern:

I have worked around apprenticeships for more than forty years, first as an electrical apprentice out of high school, and later as a licensed journeyworker, licensed electrical contractor, and apprenticeship training director. For the past twenty years, I have worked as the State Director for U.S. Department of Labor, Office of Apprenticeship, and oversee all registered apprenticeship programs in Alaska in nine industries and 70 occupations. These comments represent my personal views and experiences as a lifelong Alaskan and not that of my employer.

The mission of the Division of Labor Standards and Safety is to ensure safe and legal working conditions. The proposed changes to the electrical and plumbing licensing regulations: to eliminate the apprenticeship registration requirement for plumbing and electrical trainees, and to add a new section for student-trainees with a 10:1 job site ratio, is the antithesis of this mission statement. Eviscerating the existing regulations that have been in place since 2003 is not the way for Labor Commissioner Tamika Ledbetter to achieve her vision for Career and Technical Education in Alaska. These proposed changes to the regulations were crafted in the dark-of-day and in bureaucratic isolation - without an adequate risk assessment or input from affected stakeholders. The proposed changes do nothing to enhance the welfare or safety of Alaskan workers or the public and have the potential to do more harm than good. Alaskans deserve better.

The construction industry is considered as one of the main contributors to the economic development of the United States. However, the construction industry is considered to be the most hazardous industries because of its unique nature. The safety uncertainty of construction environments has made the construction industry one of the most dangerous industries. The construction industry is recognized as for having one of the worst safety history records among all industries. Many building construction activities are inherently risky to safety and health of on-foot workers; construction work may involves working at heights, working around moving objects, working around hazardous substances, or even a combination of several hazards which constitutes a complex work environments with multiple health and safety risks. From May 31, 2016 Report Construction Industry: The Most Hazardous Industries, www.bartleby.com/essay/Construction-Industry-The-Most-Hazardous-Industries-P37HW7WXU3DX

The electrical and plumber occupations are high-skill occupations that require a high degree of technical training and task knowledge in complex electrical and mechanical systems. More important than licensing, qualified journeyworkers are certified in several areas of their craft. Inadequate skills and safety training, shoddy workmanship and inferior installations, and lack of structured oversight, increase the likelihood of job site accidents, deaths, and lawsuits. Substandard installations in residential, commercial, hospitals, schools, and public structures can result in fires, equipment damage, electrocutions, gas explosions, heating and ventilation system malfunctions, and water and sewage contamination.

Labor Commissioner Ledbetter is attempting to link these licensing regulation changes to new career pathway options. Therefore, it is critical that Alaskans and policy makers understand the stark differences between the 8000-hour registered apprenticeship, and the proposed 12,000-hour on-the-job training (OJT) pathway, and the proposed student-trainee fitness license with a 10:1 jobsite ratio.

Registered apprenticeship is based on structured training standards that include supervised on-the-job learning (OJL). Apprentices are paid employees and must complete related technical instruction courses that supplement the OJL process. Wage advancements are based on successful performance on-the-job and with their related instruction progress. Registered apprenticeship is a proven workforce development strategy that supports local economies, builds worker skills, and establishes career pathways to higher levels of employment and wages.

Registered apprenticeships are approved for state and federal prevailed wage projects. They are approved for GI Bill benefits, and for college credits throughout the University of Alaska system. Apprenticeship completers earn higher lifetime earnings than do non-completers. Registered apprenticeship expansion strategies for youth and adults are incorporated into the State of Alaska Workforce Innovation and Opportunity Act (WIOA) State Plan. Registered apprenticeship completions are recognized nationwide for licensing purposes.

The proposed 12,000-hour OJT pathway and the proposed student-trainee fitness license with a 10:1 jobsite ratio meets NONE of the benefits and outcomes of the 8000-hour registered apprenticeship pathway. The 12,000-hour pathway is presented through rose-colored glasses as an alternative career pathway that will strengthen the economy and expand opportunities for individual Alaskans. Nothing could be further from the truth – the 12,000-hour pathway is not a viable workforce development strategy.

These occupations are not department store jobs in the retail industry. At best, this 12,000-hour pathway is a puppy-licensing mill for Labor Standards and Safety that will bring in additional cash flow, and that compromises worker welfare and safety, and reduces public safety and health standards. Alaska workers will languish at low wages as they struggle from job to job to achieve the 12,000-hour licensing threshold. Their resulting career pathway is to become under-skilled and under-qualified electrical and plumber license holders. The long-term impacts will be felt worse in rural Alaska, where employment, job site inspections, and licensing oversight are more limited. Alaskans deserve better.

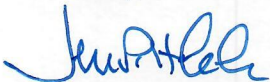
The employment of Alaskan minors is summarized in Pamphlet 200 Employment of Children (See <http://www.labor.state.ak.us/lss/forms/pam200.pdf>). Alaska child labor laws have exemptions for registered apprenticeship and student learners. Registered apprenticeship is approved as an exemption for youth because of its inherent design, structured training, safety focus, and mentor oversight. The Labor Commissioner has the ability to approve student-learner and other programs within these regulations, but it does not specify the structure or training approach. The proposed student-trainee fitness license with a 10:1 jobsite ratio is an overreach and attempt to modify and apply the student-learner provision to these electrical and plumbing licensing regulations, and to place these students “legally” onto active construction job sites.

Under the proposed regulations, the Department may issue a student-trainee certificate of fitness to applicants enrolled in a state or federally administered education program or an education program administered by an Alaska school district or charter school program. The approved job site ratio is ten (10) student-trainees to every one (1) certified journeyworker. Hours worked will be considered work legally obtained for licensing purposes. Note that the current regulations already recognize up to 1,000 hours of classroom training from an accredited educational training program for licensing work experience requirements. The 10:1 ratio might be acceptable in a vocational or high school lab or shop setting, but when is a 10:1 ratio a good or safe idea on an active construction job site? NEVER. The Department has indicated that the public just doesn’t understand the intent behind the regulation change.

This should not be a petri dish experiment. As currently written, the student-trainee fitness license is ripe for interpretation by the Department, and for abuse by unscrupulous employers and developers who would rely on a pipeline of free or cheap labor to build their projects. State or federally administered education programs such as the Alaska Vocational Technical Center and Job Corps, and education programs administered by an Alaska school district or charter school program are already subsidized by state and/or federal dollars. Does the Department have the authority to devise a licensing regulation that also subsidizes private industry by creating an unfair competitive advantage for private sector contractors, developers, or housing authorities, or for schools that may decide become a general or specialty contractor as a result of the proposed changes to these regulations? Alaskans expect better.

The Alaska Department of Labor and Workforce Development and the Division of Labor Standards and Safety should not be proposing regulations that are potentially harmful to the safety, health, and welfare of Alaskan workers and the public. The stated reasons for the proposed actions are also misleading: program standards definitely have not been developed and the proposed changes will not result in a reduction of the regulations. From a risk assessment perspective, these proposed regulation changes should be trashed, or at least postponed until the input from the affected stakeholders is considered more fully and openly.

Sincerely,



John P. Hakala



January 13, 2019

Dr. Tamika Ledbetter, Commissioner
Department of Labor and Workforce Development
P.O. Box 111149
Juneau, Alaska 99811

[Via Electronic Mail]

Re: Opposition to Proposed Changes to Regulations in Title 8 of the Alaska Administrative Code

Dear Commissioner Ledbetter:

I am deeply concerned about the Alaska Department of Labor and Workforce Development's ("department") proposed changes to Title 8 of the Alaska Administrative Code regarding plumbers and electricians. Specifically, I worry that the department does not fully appreciate the magnitude, severity, and impact of the changes it is proposing.

These changes go far beyond a simple regulatory update. When proposing drastic regulatory changes, the department has historically sought public input from key stakeholders prior to drafting regulations. It appears no such discussions took place here. Indeed, these sweeping changes have caught key stakeholders off guard. These regulations do not implement new statutes; the statute and its implementing regulations have been in place for many years. Changes to these long-standing regulations will disrupt entire workforce systems and structures, which are established around the current regulatory framework.

The department has a long and proud history in Alaska. Its mission statement is straightforward: "Provide safe and legal working conditions, and advance opportunities for employment." These regulations, however, jeopardize at least two of those core tenets: to ensure safe working conditions for workers, and to advance opportunities for employment. These proposed changes do neither. Quite the opposite, they risk the safety and health of young workers in one of the most dangerous industries in Alaska, and could stifle a generation of skilled workers in the plumbing and electrical fields.

The biggest problem is that the draft regulations do not comply with their enabling statutory authority. Regulations are simply "rules developed by agencies in the executive branch of

government.”¹ The authority to enact such rules comes from statutes passed by the legislature.² Therefore, regulations can do no more, nor less, than their enabling statutes allow. However, the department’s regulations exceed the bounds of statutory authority in at least two key areas.

First, the regulations improperly circumvent the statutory training and experience requirements of the Certificate of Fitness (“COF”) program. Both proposed 8 AAC 90.140(a) (plumber trainee certificate of fitness) and proposed 8 AAC 90.165(a)(1) (electrician and power lineman trainee certificates of fitness) remove the requirement to be enrolled in a United States Department of Labor (“USDOL”) apprenticeship program to obtain a trainee COF: instead, the only requirement for a trainee to receive a COF is to pay the department’s fee under AS 18.62.030. However, AS 18.62.050 is the enabling authority for this proposed regulation, and it provides: “(a) If, upon investigation and examination by the department, the applicant is found competent **by reason of training and experience**, the department shall issue a certificate of fitness.” (Emphasis added). Therefore, the proposed regulations clearly violate a key legislative mandate. Simply paying a fee does not comply with AS 18.62.050, which requires a COF applicant to be competent “by reason of training and experience.” By contrast, the department’s current regulations comply with this statutory mandate by requiring enrollment in a USDOL apprenticeship program.

Second, the regulations violate the spirit, if not the letter, of the statutory mandate for relevant training and work experience for plumbers and electricians. Alaska Statute 18.62.050 clearly requires that in order to obtain a journeyman COF, an applicant should have “training and experience.” Obviously, the statutory intent of AS 18.62.050 is to ensure that skilled plumbers and electricians get both *relevant* training and actual, verifiable work experience prior to receiving a COF from the department. These aren’t trivial matters—ensuring that people working in the high-demand, high-hazard plumbing and electrical trades have the training and experience necessary and sufficient to receive a journeyman license is critical for worker safety and public safety and health. Frankly, it’s the reason we have licensing requirements for these fields in the first place. But proposed 8 AAC 90.140(a) and 8 AAC 90.165(a)(1) remove any training (or experience) requirement from the trainee COF. Further, both proposed 8 AAC 90.130 and proposed 8 AAC 90.160 allow someone to obtain a journeyman COF *with absolutely no skill or knowledge in their field*, since “legally obtained work experience” is not actual structured training. As currently drafted, “legally obtained work experience” could literally be flipping hamburgers.

Aside from their legal deficiencies, these regulations undermine the department’s mission because they are both outrageous and dangerous. By removing apprenticeship enrollment, the department is eliminating any structured training for electrical and plumbing licenses. A trainee could spend 12,000 hours changing lightbulbs, making sure the water is running in every faucet, or performing any mundane or routine task at all, and receive a full journeyman license. That is not only wrong, but it abdicates the department’s responsibility to protect both workers and the public from harm. Further, it neglects the department’s role in ensuring that licensed journey workers have the proper training and experience in their fields.

Only unscrupulous contractors stand to benefit from these regulations. These contractors are no strangers to the department—they are the contractors who are looking to save a buck and

¹ <https://ltgov.alaska.gov/information/regulations/>.

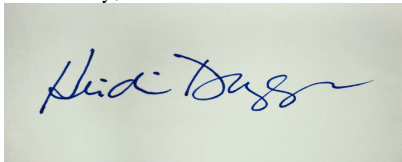
² Id.

avoid workers' compensation coverage by calling workers "independent contractors", or by ignoring necessary OSHA requirements, or by violating wage and hour laws. If these contractors see a way to game the system, they'll do it. And the department just offered them an easy play. Not a single structured training program will result from this newly-created "pathway." Frankly, it's a dead end; a cheap and shallow pool of labor to be exploited by contractors concerned exclusively with their own bottom line.

The department's proposed "student trainee" license, with its 10:1 trainee to journey worker ratio on the job site, is unconscionable and inexcusable. Had the department consulted anyone that leads a training program, or frankly anyone that has worked in construction, it would likely have scrapped this idea altogether. The legislature would never approve of issuing such a COF under its current statutory scheme. If the department adopts these regulations, it will undoubtedly face a legal challenge, stoke legislative ire, and/or prompt swift action to clarify and/or strengthen the enabling statutes.

But there is a path of less resistance for workers, stakeholders, and the department. I urge the department to withdraw these proposed regulations and engage in discussions with stakeholders and experts from across the state. The stakes are too high to rush this process and do it the wrong way. The department and stakeholders have a mutual desire and incentive to develop and train the next generation of Alaska's skilled workers. With a collaborative approach, we can ensure that all Alaskans who seek skilled training and meaningful career pathways have access to both.

Sincerely,

A rectangular area containing a handwritten signature in blue ink. The signature appears to read "Heidi Drygas".

Heidi Drygas, General Counsel
United Association of Plumbers & Steamfitters Local 367
United Association of Plumbers & Pipefitters Local 375

Weimer, Rebecca E (DOL)

From: Alaska Online Public Notices <noreply@state.ak.us>
Sent: Monday, December 30, 2019 9:14 AM
To: DOL LSS Regulations (DOL sponsored)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development.](#)

Submitted:

12/30/2019 9:13:37 AM

Kyle Kaiser
kkaiser@ibew1547.org

Anchorage, AK, US
Anonymous User

Comment:

Commissioner Ledbetter,

The proposed changes/elimination of Electrical and plumbing/pipe-fitting apprenticeships is unacceptable. These crafts require quality training and craftsmanship. Poorly performed work in these fields can lead to death, not only for the worker but for the general public. These crafts are highly sought after by transitioning Service Members, and their spouses. The Veteran Electrical Entry Program (VEEP) is a direct entry program that places Service Members and/or their spouse into an electrical apprenticeship. We are able to do this because we have standards. Please do not help destroy the most effective means our Military Families have for entering our apprenticeship.

Sincerely,

Kyle Kaiser
OIF/OEF Veteran

You can review all comments on this notice by [clicking here.](#)

[Alaska Online Public Notices](#)



ANCHORAGE ALASKA AREA PIPE TRADES LOCAL 367
JOINT APPRENTICESHIP TRAINING COMMITTEE

617 West Potter Drive Anchorage, AK 99518-1148
Phone: 907-562-2890 Fax: 907-562-0083

January 10, 2020

Dr. Tamika Ledbetter, Commissioner
Department of Labor and Workforce Development
P.O. Box 111149
Juneau, AK 99811

Re: Proposed changes to Title 8 of the Alaska Administrative Code eliminating apprenticeship standards for plumbing and electrical trades

Commissioner Ledbetter,

As a longtime Instructor and now a Training Coordinator with the Plumbers & Pipefitters Joint Apprentice Training Committee, I am writing this letter in opposition to **8 AAC 90.300 Student Trainee Certificate of Fitness**. This will make for a public safety issue as well as unfair advantages to certain contractors.

As for the safety aspect, I personally would not want some one not properly trained working on my home or business. The way I read this, a student trainee can be performing any menial task on a job (sweeping or parts delivery) and after 12,000 hours be allowed to test out without really having proper training. The 10 to 1 ratio is not a very good idea. As a Foreman and Journeyman, it is hard enough to keep up with supervising and teaching 1 to 2 apprentices on a job. 10 student trainees would be near impossible to keep track of for one Journeyman or Supervisor. This will result in work being performed at sub-par installation, illegal installations, or even unsafe conditions. Does this mean now anyone can install a Medical Gas system in a hospital that patients are hooked up too, testing Backflow preventors, or even working with refrigerants like Ammonia right out of High School?

How does this proposal help an employer? As I see it, a student has to pay tuition to these schools and an employer can use these students to build modules or buildings under "on the job learning" but not have to pay them a wage? Seems like an unfair advantage to the employers and apprentices out there that have dedicated their time and resources into obtaining a proper education. Why would you pay someone to do the job when you can get them to do it for free? Again, I strongly Oppose this proposal and your reconsideration is appreciated.

Jason Fernandes
Training Coordinator
Local 367



Marathon Petroleum Corporation
54741 Energy Way, Kenai, AK 99611
907-261-7221

Ms. Becky Weimer
Department of Labor and Workforce Development
Labor Standards and Safety
P.O. Bo 111149
Juneau, AK 99811-1149

VIA EMAIL // RE: PROPOSED 8 AAC 80.110 (c)

Dear Ms. Weimer:

Marathon Petroleum Corporation ('MPC') is pleased to comment on the proposed regulation seeking to adopt the API pressure relief testing valve standard. Our comments today are only concerning the adoption of '8 AAC 80.110 (c)'.

Refineries are built to run 24 hours a day, 365 days a year. Refineries do have their own scheduled maintenance cycles – or turnarounds. At these times, major and minor maintenance items are addressed – including pressure safety valve (PSV) testing.

Currently the pressure safety valve (PSV) testing as prescribed by the Department of Labor is on a no greater than 5-year cycle and does not sync into the general turnaround cadence. As a result of the current regulation, we are having to take equipment out of service off-cycle that increases costs and causes operational concerns. MPC currently prescribes to a robust national PSV testing and maintenance protocol such as API 576 that is generally equal to or more stringent than state standards.

MPC fully supports the adoption of the proposed regulation '8 AAC 80.110 (c)'.

*8 AAC 80.110 is amended by adding a new subsection to read:
(c) Operators with a verified testing and inspection program, and certified under the standards of Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration (API 510), as published by the American Petroleum Institute, may perform testing at intervals consistent with that standard.*

The adoption of this regulation would allow the use API 510 Pressure Vessel Inspection Code to set PSV inspection intervals – essentially adopting the national best practice standard. MPC believes the adoption of this regulation will be to the mutual benefit of the state and the operator and would strongly encourage its adoption.

Sincerely,
Casey Sullivan

/s/

Manager, Government and Public Affairs

Alaska Oil and Gas Association



121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503-2035
Phone: (907) 272-1481 Fax: (907) 279-8114
Patrick Bergt, Regulatory and Legal Affairs Manager

January 13, 2020

VIA EMAIL: becky.weimer@alaska.gov

Ms. Becky Weimer
Department of Labor and Workforce Development
Labor Standards and Safety
P.O. Bo 111149
Juneau, AK 99811-1149

December 4, 2019, Notice of Proposed
Changes to Regulations in Title 8 of the
Alaska Administrative Code

Dear Ms. Weimer:

The Alaska Oil and Gas Association (“AOGA”) is a professional trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. AOGA’s membership includes 14 companies representing the industry in Alaska that have state and federal interests, both onshore and offshore.

This letter is provided in response to the Alaska Department of Labor and Workforce Development’s (“DOL”) December 4, 2019 Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development (“Notice”). These comments address only DOL’s proposed amendments to 8 AAC 80.110(c).

AOGA appreciates DOL’s recognition of the need for consistent and universal standards for relief valve performance testing. To that end, AOGA supports DOL’s proposed changes to 8 AAC 80.110(c), which seek to amend existing code and allow operators (with verified and certified testing and inspection programs) pressure valve testing intervals consistent with the national standard.

Under existing regulation, refineries are unnecessarily confined by a 5-year performance testing mandate. Adopting the standard testing intervals as provided for in Pressure Vessel Inspection Code: In-service Inspection, Rating, Repair, and Alteration (API 510), removes the 5-year mandate while enhancing health and safety by requiring adherence to a robust program consistent with national standards.

Ms. Becky Weimer
January 13, 2020
Page 2

Thank you again for seeking input on the proposed amendment. We appreciate DOL's consideration of the comments provided herein.

Sincerely,

A handwritten signature in blue ink, appearing to read 'P. N. Bergt', with a stylized flourish at the end.

PATRICK N. BERGT
Regulatory and Legal Affairs Manager

January 8, 2020

Dr. Tamika Ledbetter, Commissioner
Department of Labor and Workforce Development
P.O. Box 111149
Juneau, Alaska 99811

Proposed changes to Title 8 of the Alaska Administrative Code eliminating apprenticeship standards for plumbing and electrical trades

Commissioner Ledbetter:

As a career tradesman, I have always respected and valued the work of the Department of Labor in keeping workers and the public safe, and helping Alaskans from all walks of life find meaningful pathways to employment and careers. These proposed regulations, however, are a complete reversal in course. Seemingly without stakeholder input prior to drafting, the Department is embarking on a reckless course that risks public safety and the dismantling of more than 70 years of strong construction apprenticeship programs.

The Department's proposed regulations are ill-advised for three main reasons. First, they eliminate apprenticeship requirements for trainees. Second, they could result in fully licensed plumbers, electricians, and linemen with no training in their field. Third, they propose a dangerous 10:1 trainee to journey worker ratio that is unheard of in the dangerous construction industry.

It's important to note that the public is in the dark as to the intent behind the proposed regulations and the proposed language does not paint a pretty picture for residents of Alaska. First, the regulations remove apprenticeship from plumbing and electrical trainee licenses. These two highly skilled crafts install the plumbing and electrical systems that you, your neighbors and your children are using or drinking from every day. Access to USDOL registered apprenticeship programs is intrinsic to the high quality installation of these systems and the public safety of all Alaskans. Why would anyone in their right mind want to lower the requirements for the licensing of the craft hands installing these critical systems? Therefore, a worker could be on any kind of construction project—whether residential, commercial, or industrial—without any training program. What will result is a low paid pool of unskilled or low-skilled “trainees.” Without apprenticeship, unscrupulous employers will simply use this “trainee” pool for cheap labor as a way to cut costs on projects—while putting workers and public safety at risk. We have seen this play before time and time again. Without a structured training program, contractors will not commit to training these workers the way an apprentice would receive training in a USDOL registered apprenticeship program. To make matters worse, the Department has increased the hourly requirement from 8,000 to 12,000 hours, ensuring that low-wage “trainees” will be firmly stuck at the bottom with virtually no ability to advance. What will result will be the watering down of our skilled workforce, in some of the highest-demand skilled trades in the state.

Further, removing the apprenticeship requirement damages our thriving registered apprenticeship programs, which is the key driver in turning out skilled plumbers and pipefitters in Alaska. Without question, this regulation jeopardizes this nearly 75-year old program.

Second, by removing the training requirement, a “trainee” can spend 12,000 hours sweeping floors, changing lightbulbs, taking out the trash, or literally performing *any* task on a jobsite and become a fully licensed electrician, lineman, or plumber. In fact, a licensed hairdresser or manicurist would have better skilled training for their professions than fully licensed plumbers, electricians, or lineman. And yet, no one risks injury or death from a bad haircut or manicure. A poorly trained worker will not have the understanding for the equipment needed to safely install a potable water line to ensure that there isn’t cross contamination from another system that it may tie to. Plumbing is one thing but you can’t see or hear electricity so that is a large risk to the public in my eyes as well.

Third, the department is playing a very dangerous game with worker ratios in proposing a new “student trainee” license, and allowing a 10:1 trainee to journey worker ratio on the jobsite. This is in stark contrast to the federally required ratio of 1:1 apprentice to journey worker ratio. Construction work is inherently dangerous, and experiences some of the highest fatality rates across industries. These regulations will put young and inexperienced student trainees at risk for injury or death.

Finally, I invite you to Fairbanks to come tour our Apprenticeship Program to gain a deeper understanding of the detailed and structured nature of our training, and why it’s important that the Alaska Department of Labor and Workforce Development continues to support our Labor-Management Construction Registered Apprenticeship Programs. With greater collaboration, I’m certain we can work together to ensure that workers have access to skilled training in a safe environment, and keep our private sector growing.

Sincerely,



Bob Hubbard

Business Manager

United Association of Plumbers & Pipefitters Local 375

ALASKA STATE LEGISLATURE



House of Representatives

January 13, 2020

Dr. Tamika L. Ledbetter, Commissioner
Alaska Department of Labor and Workforce Development
P.O. Box 11149
Juneau, AK 99811

Re: Notice of Proposed Regulations – Mechanical Inspection

Dear Commissioner Ledbetter,

We are writing to express our strong opposition to changes in plumbing and electrical regulations that would eliminate apprenticeship utilization and double the ratio of apprentices to journeyworkers. These regulations would significantly expand the risk of on-the-job deaths and serious injuries while undermining the primary workforce development system for the industry.

Registered Apprenticeship has long been the cornerstone of training in the electrical and plumbing industries. With a 1:1 ratio of apprentices to journeyworkers, apprenticeship training dramatically lowered death rates while improving productivity and ensuring that companies benefit from a consistent pipeline of workers with on-the-job training. As the department itself has documented, apprenticeship has an unparalleled record of providing a skilled workforce, which means more jobs for Alaska residents and more skilled workers available for Alaska business owners.

The proposed regulations would be devastating for multiple reasons. First, they eliminate the "apprenticeship" requirement and would replace it with a nebulous "trainee" standard. Second, the proposed regulations would double the number of trainees who could be supervised by a journeyworker. For occupations where a single error can result in death--not just for individual workers but others on a job site--these changes present a clear and present danger to the life and safety of Alaska workers, and must be discarded.

It is important to note that joint Registered Apprenticeship programs invest approximately \$50,000 per year over a four-to-six- year period to train electricians and plumbers. The proposed regulations would substantially undercut this system, and would not only endanger Alaskans but also contribute to massive disinvestment from our workforce development system. We only have a high-quality apprenticeship system for these occupations because it is funded by industry and employees, with professional instructors, classrooms, and training facilities. Eliminating

apprenticeship requirements and changing journeyworker-to-trainee ratios would allow substandard firms to consistently underbid firms that invest in adequate training.

Finally, these regulations would tear down an important career ladder for our military veterans. Both electrical and plumbing apprenticeships have well-established programs (such as VIP: Veterans in Piping) for transitioning service members entering the trades. Gutting apprenticeship would mean more veterans would leave Alaska due to lack of transitions into post-service employment.

We want good jobs with decent pay and excellent training for high standard, quality work and safety. We urge you to withdraw these proposed regulations and stand with Alaska businesses and workers for whom the apprenticeship system is the foundation of workforce development.

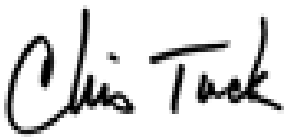
Thank you,



Representative Zack Fields



Representative Kelly Merrick



Representative Chris Tuck



Representative Gabrielle LeDoux



Representative Jonathan Kreiss-Tomkins



Representative Dan Ortiz



Representative Matt Claman



Representative Grier Hopkins



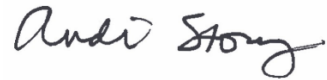
Representative Ivy Spohnholz



Representative Andy Josephson



Representative Sara Hannan



Representative Andi Story



Representative Laddie Shaw



Representative Louise Stutes



Representative Harriet Drummond



Senator Elvi Gray-Jackson



Senator Tom Begich



Senator Scott Kawasaki



PATRICK MECHANICAL LLC

MECHANICAL CONTRACTORS
A Subsidiary of Aleut Corporation
3307 International Street
Fairbanks, Alaska 99701
(907) 452-3334 Fax (907) 452-3369
E-Mail: pmi@patrickmechanical.com

Attn: Ms. Becky Weimer
Dept of Labor and Workforce Development
dol.lss.regulations@alaska.gov

As the President of Patrick Mechanical, LLC., this letter is in response to the proposed regulation changes dated December 4th, 2019. These proposed changes make me question the quality of future State licensed apprentices and journeyman. Changing or eliminating any of the current apprenticeship requirements will be detrimental to a well-trained Alaskan workforce.

8 AAC 90.140: I do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In our experience, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

8 AAC 90.300: I do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

Accredited apprentice training programs are subject to rigorous standards and are subject to review and approval by the Bureau of Apprenticeship and Training. With performing the majority of mechanical work in the interior on State, Local and Federal projects, I hope my vast experience and knowledge in this arena would prove invaluable in the State's decision making.

Also, please copy the attached link to a recent study on the value of Joint Apprenticeship Programs.

<https://www.mcaa.org/news/study-reinforces-the-value-of-joint-apprenticeship-programs/>

Respectfully,

Mel Weeks MECM#1209
President
*Patrick Mechanical LLC &
Aleut PM Holding Company LLC*
A subsidiary of Aleut Corporation
Office (907) 452-3334
Cell (907) 347-7533
mweeks@patrickmechanical.com



MECHANICAL CONTRACTORS
of Fairbanks, Inc.



Attn: Ms. Becky Weimer
Dept of Labor and Workforce Development
dol.lss.regulations@alaska.gov

As a collective of multiple mechanical contractors within the interior of Alaska, this letter is in response to the proposed regulation changes dated December 4th, 2019. These proposed changes make us question the quality of future State licensed apprentices and journeyman. Changing or eliminating any of the current apprenticeship requirements will be detrimental to a well-trained Alaskan workforce.

8 AAC 90.140: We do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In our experience, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

8 AAC 90.300: We do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

Accredited apprentice training programs are subject to rigorous standards and are subject to review and approval by the Bureau of Apprenticeship and Training. We hope our vast experience and knowledge in this arena would prove invaluable in the State's decision making.

Respectfully,

Mel Weeks
President
Mechanical Contractors of Fairbanks
1-907-452-3334

From: [Theodore Swanson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Changes to Title 8 of AAC
Date: Wednesday, December 18, 2019 1:36:29 PM

To Whom It May Concern,

I am the product of the I.B.E.W. 1547 Apprenticeship. To me, the apprenticeship represents a comprehensive education for a highly skilled trade.

The proposed changes to Title 8 of the Alaska Administrative Code would undermine the apprenticeship programs already equally available to all who are qualified to learn and do the work of the trades affected. It would also stretch, to the limit, any competent Journey-worker's ability to work effectively and "directly supervise" those assigned to work under him/her.

Any removal of a requirement that a worker shall be registered in an approved apprenticeship would drastically alter the quality of work being done in the state of Alaska for the worse.

These changes would ensure the cost of public and private projects rise as a result of gross incompetence by an unqualified workforce, disguised as a ploy to "lower costs" for employers.

When the ratio of unqualified "trainees" to qualified Journey-workers is ever more than 1:1 the resulting work being done is not going to be able to hold a candle to the work that a qualified apprentice and his or her qualified Journey-worker would be able to accomplish.

The establishment of a "student trainee" directly undermines those who enter an accredited apprenticeship program like the I.B.E.W.'s. There is no way that it is physically possible to "directly" supervise 10 unqualified workers. Especially when the work itself is dangerous, sometimes to point of life and death, while working in or around live power panels.

Not to mention, using trainees not enrolled in an apprenticeship allows for the employer to discard the trainee at will when the construction season slows down, at which time the trainee will not have any reliable way to go back to work in the trade, like an apprentice would. This leaves little incentive to train the workforce and would gut the apprenticeship programs in Alaska that already have a proven effectiveness at turning out qualified Journey level Craftsmen.

What studies have been done to back up the need to implement a "student trainee" classification? If none, then why make a change to a system that effectively works?

Do you understand your proposed definition of the term "Direct Supervision"?

Have you ever visited a construction site and witnessed a competent Journey-worker try to do his/her job effectively and "directly supervise" more than one qualified apprentice?

Answering "yes" to the above question would be a lie, and thus "no" would be the only applicable answer, so then how would a well-trained and qualified competent Journey-worker be able to effectively do his/her job while "directly supervising" up to ten unqualified student trainees?

The trades affected by these changes are skilled trades sometimes dealing with very dangerous work, do you think it would be wise to let a doctor supervise up to ten first year medical students each performing their own surgery in different rooms?

Do you think it to be physically possible to "directly supervise" ten unqualified trainees in ten different rooms?

How then is it even remotely feasible to allow an employer to hire ten "student trainees" to every Journey-worker and then expect them to actually "directly supervise" all ten of them according to your definition?

This is just asking for newly constructed buildings to burn to the ground, or flood, or for multiple people to be seriously injured on every job in Alaska's future.

I have never been on a construction site where more than two people from the same trade are working in close enough proximity to be considered able to "directly supervise" one or the

other. These trades require some space to do the work required of them in an effective and professional manner.

In defining of "Electrical Wiring" and "Plumbing", what exactly does an ambiguous list of "other construction heavy equipment" entail?

What is the purpose of eliminating "heavy power equipment" from "electrical code work" and "plumbing code work" other than to attack the work that these licensed trades already do when it pertains to their scope?

In closing, these trades are licensed skilled trades because they are physically dangerous and require skill to do effectively and safely. Letting employers hire students off the street and then allowing them to discard them when work slows down, is a direct attack on the proven and effective apprenticeship programs already established in the state of Alaska.

By adding a new "student trainee" classification to the certificate of fitness for which wages have not been established would undermine the wages of the hard working middle class of Alaska allowing the employers to "cut costs" by bringing in unskilled labor whose intent may or may not be to stick with the trade they work in, and undercutting a Journey-worker's ability to "directly supervise" the work being done under his/her Certificate of Fitness.

This would increase the cost of projects by allowing unprofessional and unskilled labor to take place which increases accidents and increases mistakes made.

These changes are shortsighted at best and reflect the poor planning for Alaska's future by the current government, and more so those in charge of proposing changes to standards of Alaska's Department of Labor.

As a Journeyman Electrician, I refuse to let unskilled labor work under my license and do work in my name. I will not lie about my ability to "directly supervise" ten unskilled student trainees, it's not an ability any Journey-worker possesses. These changes are ridiculous and come from an uneducated viewpoint.

All these changes do is weaken the strength of the people that joined these trades in hopes to provide a decent living for their families and it drastically cuts the amount of work each one would be doing in a year. Do not implement these proposed changes.

Sincerely,

Theodore Swanson
Journeyman Electrician

I am submitting this letter to oppose any changes in Title 8 of the Alaska Administrative Code. I am a Journeyman Plumber/Pipefitter. As a product of a Registered Apprenticeship and Utility Internship, I know the value of one-on-one training/mentoring. The plumbing/pipefitting and electrical fields are both highly skilled industries. Without the one-one-one ratio for transfer of information, steps can be missed, and accidents can happen, there are no shortcuts in learning proficiency in highly specialized trades. Please reconsider the changes to Title 8 of the AAC.

Thank-you,

Les Syvertson/Alaska Water Wastewater Management Association (AWWMA) Training Committee

January 10, 2020

Becky Weimer
Department of Labor and Workforce Development
Labor Standards and Safety
P.O. Box 111149
Juneau, AK 99877

My name is Domenic Monzingo and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

I was born and raised in Alaska and have been in the Plumbing trade for 32 years. I started my career by completing a D.O.L., federally registered apprenticeship program giving me a Journeyman Plumber Certificate of Fitness and a vast knowledge of the trade.

I have worked as an apprentice, journeyman, foreman and general foreman on many jobs throughout the state and have been an Apprentice Instructor for Local 375 in Fairbanks since 2013. I have seen firsthand the dangers in our workplace including the death of my youngest brother in 1994 on the North Slope and feel that apprentices or trainees require stringent safety training and constant journeyman supervision to prevent injury or death. As an instructor I see firsthand the negative effects of not having the proper oversight when trying to teach/train individuals and with a skilled trade that's even more important. An improper installation or procedure could result in illness, injury, or even death. To introduce any type of trainee to the workforce with a ratio of 10 trainees to 1 journeyman plumber (AAC 90.300) would be disastrous to the safety of the apprentices, trainees, and everyone around them and would have massive negative impacts on the quality of installations. In an industry driven by safety, this would be a step backwards for all contractors involved as well as a danger to all Alaskans in the workplace. I strongly oppose giving credit to trainees that are working in anything more than a 2 to 1 Journeyman to trainee ratio as it is not possible for them to gain the knowledge they need to become our licensed workforce of the future.

I also feel that eliminating the requirement that a trainee be indentured in an accredited apprenticeship program (AAC 90.140) would have severe negative impacts on the future of the trade in Alaska. These accredited programs have D.O.L. oversight and are subject to rigorous standards. Eliminating the requirement would ultimately result in a reduced skillset that would be unfair to the trainee and the contractor they will work for.

Sincerely,



Domenic Monzingo
Apprentice Instructor
UA Local 375 Plumbers and Pipefitters JATC

From: [907akminer](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed anti-apprenticeship regulations
Date: Friday, January 3, 2020 11:43:07 AM

Dear Commissioner Ledbetter,

I am writing to oppose DOL's proposed anti-apprenticeship regulations. I have first hand experience in how well apprenticeship programs work as well as how dangerous a job site can be without properly trained workers. Eliminating apprenticeship standards, and allowing journeyworker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death. These regulations undercut our longstanding, privately-funded training programs supported by contractors and construction workers. Your proposed regulations would also reduce career opportunities for transitioning service members. I can see no benefit to anyone with these proposed regulations. Please withdraw these proposed regulations.

Thank you for your work to defend apprenticeship, our jobs, workplace safety, and job opportunities for our veterans.

Sean Kelley

Sean Kelley
907-232-1768

Sent via the Samsung Galaxy S8, an AT&T 4G LTE smartphone

From: [adam.yadlosky](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 6:44:03 PM

From: [Adrie Setten](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Regulations
Date: Monday, January 13, 2020 9:29:05 AM

Commissioner Ledbetter,

I am writing in **staunch** opposition to newly proposed regulations by the DOL that would **dramatically** scale back worker protections and devalue workers credentials.

The new regulations for the electrical and plumbing trades would devalue hundreds of Alaskan Linemen, Electricians, and Plumbers across the state and would run the risk of negatively impacting our economy. It is **fundamentally** flawed that the department thinks it should *lessen the requirements* for complicated trades such as these. Doing so puts our citizens, military, schools, and families **at serious risk of dire injury or death**. It is not safe and runs counter to the ideals I thought the department stood for.

The new regulations regarding apprenticeship programs increase the apprentice/journeyman ratio by 900%, and radically reduce the impact of safety of these programs. By reducing the number of journeymen to apprentice to 10:1 from 1:1, you are effectively stripping the next generation of apprentices of valuable training in their craft. This idea is **flawed**.

Most importantly, **the increase of apprentices from 1:1 to 10:1 PUTS ALASKANS AT SERIOUS RISK OF INJURY OR DEATH**. These ratios were not picked haphazardly, they have been paid for **in blood** by the Alaskans that came before us.

As an Alaskan citizen, taxpayer, and voter, I ask that you **vigorously REJECT** these proposed regulation changes immediately.

Thank you,

Adrie Setten
Anchorage
907-947-8357

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Monday, January 13, 2020 2:13:15 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/13/2020 2:12:58 PM

Stephen Hennessey
hemdale007@gmail.com

Wasilla, AK, US
Anonymous User

Comment:

The proposal to remove requirements for Electrical and Plumbing Apprenticeships. I strongly oppose this action. I am a retired inside wireman. Without proper training plumbers and electricians present a health and safety hazard to the public at large. To the general public, a professional, the plumber or electrician must possess a level of understanding of what they are to be paid for. I have personally experienced the creative wiring practices of said electricians. I experienced a window screen company that through window screen sales received an offer from his insurance for \$100,000 for electrical work. He perceived that made him an electrician. His client required I produce my license to repair his work. Another was a handyman decided grounding was unnecessary. That action produced a fire in a 3 story house. Yet another, 1st year apprentice working on a commercial lighting system was "Dead before she hit the ground" from her ladder. Removal of apprenticeship requirements shall produce more fires and deaths.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Monday, January 13, 2020 1:10:55 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/13/2020 1:10:49 PM

Amberle Wright
amberle1112@yahoo.com

Austin, TX, US
Anonymous User

Comment:

More time is needed for discussions between the parties proposing the changes, and those personnel and companies that will be affected in the field by the proposed changes. Due to the timeframe of these changes coming out, many affected parties are just finding out about this, or are still unaware.

As is, this jeopardizes the safety of Alaska workers.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Monday, January 13, 2020 10:22:44 AM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/13/2020 10:22:38 AM

Jay Quakenbush
jiquakenbush@gmail.com

Wasilla, AK, US
Anonymous User

Comment:

Dear Commissioner Dr. Ledbetter,
We have not met so please let me briefly introduce myself. I am a life long Alaskan, born in Fairbanks and just recently moved to Wasilla. I am a retired electrician and have gratefully spent 40 years working in the electrical industry in many roles. I graduated from the NECA/IBEW Electrical Apprenticeship Training program.
My most rewarding role was on the job teaching of apprentices, and passing on knowledge that was past onto me from other Journeyman electricians. This was only accomplished by the fact I was able to learn from direct supervision from other Journeyman.
Typically this occurred with a ratio of Journeyman to Apprentice of no more than 1 Journeyman and 2 Apprentices. This is why I am writing to you today opposing the "Trainee" classification at a ratio of 1 Journeyman to ten trainees. The Department of Labor can not expect trainees to become knowledgeable in the electrical field with a ratio of 1 to 10. This type of ratio is setting those individuals up for failure, injury, or even death by not having proper supervision and training. It is also setting up customers using this type of ratio for system failures, some of which can be also life threatening.
The State of Alaska needs a solid stream of skilled electrical workers coming through the ranks. These skilled workers will only be produced through structured apprenticeship programs that take the class room training to the job sites to learn at ratios that can be safely and efficiently administered.
Not only do I know this to be the case through my own training, I have talked to many others who have sought training on the job through a less than desirable ratio, and it has not worked for them. That is why many of them sought the training of the NECA/IBEW Apprenticeship. I volunteered many hours interviewing hundreds of apprentice applicants for the NECA/IBEW program, many of these applicants had tried training that was not structured in a way they could get on the job oversight and training they needed to learn. The ration of Apprentices to Journeyman was too high. Not only did they commonly express they could not adequately learn the Trade, they many times felt unsafe in what they were doing, putting themselves at risk.
Commissioner, let me be frank! I see this change to Title 8 as nothing more than a cheap form of labor. I will go out on a limb and say that this has industry written all over it. Be it the gold mining industry, oil industry or who ever shame on them! This would be an example of them cutting corners to develop a project at the risk of human life, system failure, which leads to environmental disaster. I urge you to not let this happen.
The Alaska Department of Labor and Workforce Development talks about "Return on Investment" for a well trained worker. The "trainee" classification at a 1 to 10 ratio does not meet the standard of Return on

Investment for the State of Alaska, it's workers, or the construction industry we support.

Thank you for your time.

Sincerely,

Jay Quakenbush

3599 W. Discovery Loop

Wasilla, Alaska 99654

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Monday, January 13, 2020 8:25:25 AM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/13/2020 8:25:20 AM

Preston McKee
pmckee@ravenelectric.com

Anchorage, AK, US
Anonymous User

Comment:

I have worked in the electrical trade since 1984. when I started there was not an apprentice school available for me to attend, but was lucky that I had a good employer that wanted to teach me to be a good electrician. After two years I was able to take electrical apprentice training classes. Much was learned and needed to be learned in these classes. To take away the requirement for good solid documented training is a huge disservice to the community and the safety of said community. The increased potential for fires and electrocution are the two main concerns.

We provide Electrical service for a lot of older structures and we still are coming across major problems caused by improper installation due to lack of past training and structured regulation.

Being an electrician is a very technical job. to be good at it you must have a strong base education and be willing to continue learning about new technologies and stay abreast of the codes and code changes.

I am an electrical Administrator, That license requires me to be responsible for all work completed under my direction. I am at an increased risk of a lawsuit if I have uneducated people working under me.

It just does not make sense to not require an adequate level of training and learning progression for the people installing permanent electrical wiring and equipment in are commercial buildings and homes.

I woke closely with the elevator trade from time to time and I can vouch for their trade as being highly dangerous and technical. Hence requiring regimented training and apprenticeship to develop technicians that are competent in their field.

Please take a harder look at the negative impacts of this proposed regulation.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Monday, January 13, 2020 8:12:38 AM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/13/2020 8:12:34 AM

Dave L Rolfe
dave.rolfe.ak@gmail.com

Anchorage, AK, US
Anonymous User

Comment:

This "proposed" regulation should be concerning to all Alaskans. As a lifelong resident and an high time apprentice in the IBEW wireman program, I can confidently say that I see great pride in Alaskans when it comes to work ethics and responsibility to our workforce and the folks that have broke their backs to build this state. Whether Union, non union or part of a training program we should strive and expect the highest ethics and quality of work and education in this great state. This regulation would devalue so much of what we have worked so hard to achieve. A qualified and safe work force which puts quality of service and life over pennies in pockets. Most would probably call this a battle between union and non union work forces but it is not. It feels as though the state for whatever reason wants to sneak in a regulation which makes little to no sense and for what cause? This is the true question Alaskans ought to be asking themselves. I won't get into all of the details of this regulation but I can say that a program with which there is no set standard of education is a recipe for disaster. In fields as crucial to our infrastructure as Electrical and plumbing we should have higher standards than what the state is proposing. Its somewhat mind boggling that the state would require training and certification for something like hair dressing or massage therapy yet they would propose that vital trades such as these are fine without. These are dangerous trades where human lives are the compromise whether personal property damage or injury is the cost, whether it be to a customer or laborer. Shame on the state for not thinking this through and devaluing Alaskan ethics and standards.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 6:42:02 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 6:41:56 PM

Wasilla, AK, US
Anonymous User

Comment:

My name is Bryant Saldarriaga, I am an I.B.E.W. wiremen journeyman, raised in Alaska since I was in 6th Grade. In my time in the I.B.E.W., we have had to endure numerous Governor's and policy changes. I am writing in STRONG opposition to the proposal, essentially gutting the programs and safety measures that allow me to safely work in my field and come home to my family safely each and every night.

The proposed changes make no sense and put a lot of people at risk for safety concerns by allowing under trained employees to perform the work that I attended several years of schooling to perform with pride.

To put it into perspective, after 6 years of being a flight attendant, you don't automatically become a pilot, after 6 years of being a medical assistant, you don't automatically become a surgeon, after 6 years of playing little league, you don't automatically play in the major leagues, and after 6 years of owning a dog, you don't automatically become a veterinarian.

I oppose the changes to the proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1. That is like allowing a home daycare to be overrun by children that one person cannot ensure the safety for. Licensed trades have time tested these ratios and they work. These ratios keep me safe, and provide my family with peace of mind. Jobs with apprentices who are properly trained, give the workforce skills needed to avoid injuries and accidents.

Plumbers and electricians built the pipeline and continue to build the infrastructure we use to drive our Alaskan economy. If we jeopardize the quality of training, we jeopardize Alaska. We jeopardize families and cause our spouses/families unneeded stress.

I am writing today to express my ABSOLUTE opposition to the proposed regulation changes affecting the plumbing and electrical skilled trades. The proposed changes in apprenticeships and licensing are unnecessary and will only hurt the state in the long run.

This will negatively impact workers as well as Alaskan contractors. In a slow economy like we have now, the last thing the state should be doing is hurting employers and workers who contribute to this economy. Apprenticeship programs established by Alaskan contractors and craftsmen have successfully provided a well-trained workforce in these occupations for decades. If these proposed regulations are adopted, there will be more worker injuries and deaths. It will end up costing our state in the long run. Mediocre training and licensing requirements can also result in catastrophic and expensive equipment failure in buildings

and electrical infrastructure systems putting the public's safety at risk.

This cost of undertrained workers will affect MANY. I am extremely concerned about the safety ramifications of removing apprenticeship requirements from these trades. I would not feel safe working in my field.

I am a new father and I am appalled that the state would jeopardize my life with these proposed changes. My family has also expressed anger at the Governor for even suggesting such a dangerous and careless plan.

Electrical and plumbing systems can be hazardous, if not fatal, to both the installer and/or end user if not installed properly. Apprenticeships help ensure that employees that are new to these trades are well educated and supervised during the early years of their careers. They need the supervision to ensure safety.

All the systems and regulations linked to these trades are directly related to public health/safety, and we should never reduce the training required to become a journeyman.

The Department of Labor and Workforce Development's recently announced proposed regulation changes for plumbers, electricians, power linemen and apprenticeship training for these trades dilutes the licensing requirements for journeymen and apprentices. A section of the new language proposes an employer's statement that the applicant has 12,000 hours of work experience, but with no training/apprenticeship requirements attached is documentation enough for the state to issue a license.

There is no requirement that the applicant has worked any of these hours under the supervision and direction of a licensed journeyman which poses a HUGE SAFETY ISSUE. These occupations ARE very dangerous, this is why we spend so much time learning and training under people who uphold these safety measures to ensure each person makes it safely through their apprenticeship. Current licensing regulations for journeymen and apprentices must be maintained PERIOD. I am very unhappy with this Governor's lack of knowledge and caring for the Alaskans performing these dangerous jobs.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 5:14:54 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 5:14:49 PM

Mark Bartlett
bartlema66@gmail.com

Seattle, WA, US
Anonymous User

Comment:

To Whom it May Concern:

I am writing today to voice my concerns to the proposed electrical licensing requirements that the Governor has out there currently.

I am a registered State of Alaska Journeyman with a current Certificate of Fitness # 00116443. I have been a Journeyman Electrician for over 40 years. In these years of experience I have mentored countless electrical apprentices and have seen every one of these men and women turn out to become journeymen themselves.

I am against the current proposal out there at this time. For many reasons actually; but the main reasons are this--you must spend an inordinate amount of time with each individual to train and mature them into skilled technicians that are fully capable of the job demands. These demands are necessary for producing thoughtful, capable, reasoning individuals that will carry out their new craft in a SAFE manner.

I also see an avenue for 'abuse' of these new proposals.

Thank you for allowing me to get a comment out to your committee.

Respectfully,

Mark A. Bartlett
Wasilla, Alaska

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 4:47:33 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 4:47:28 PM

justin walker
erzburg1@yahoo.com

Ketchikan, AK, US
Anonymous User

Comment:

hi my name is Justin walker I am a journeyman electrician since 2004 I do not support the proposed changes to the apprenticeship standards the job is dangerous at times

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Friday, January 10, 2020 4:44:12 PM

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 4:34:19 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 4:34:15 PM

Jacob Till
A_K_Jake@yahoo.com

Seattle, WA, US
Anonymous User

Comment:

My name is Jacob Till As a journeyman electrician with an Alaska administrator card I find it imperative to have proper training in the tradesman industry. With that that said I feel that the regulations proposed will be abused and the possibility of lives lost with lack of intimate knowledge that is passed from journeyman to apprentice.

The financial impact it could have on the trades in a whole. I could see this proposal being abused to where a company has three journeyman and 20 apprentices. Monopolizing on projects because they can under bid every other contractor and for this to be the status for what it is to run a successful electrical/plumbing company, devaluing an already declining skilled industry. I understand that vocational schools are necessary as I my self went to Alaska vocational technical center but most of my expertise came from my one on one or one on two relationship with my journeyman.

That's why I'm not in favor of this proposed regulation change.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 4:14:46 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 4:14:43 PM

James Lammie
jlammie@acsalaska.net

Solomon, AK, US
Anonymous User

Comment:

I am a retired electrician and electrical contractor licensed in the State of Alaska, with 50+ years of experience
I believe that eliminating the apprenticeship training requirement for plumbing and electrical trainees is a huge step backwards, undermining the Alaskan Construction Industry and jeopardizing the safety of all Alaskans at home, work, schools and places of recreation.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 4:09:00 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 4:08:52 PM

Zachary Coss
zcoss@kpunet.net

Ketchikan, AK, US
Anonymous User

Comment:

I strongly believe the Alaska Dept of Labor should not change the apprenticeship programs. Our current system is working very good. Alaska has high standards for workers and I do not believe lowering them will be helpful to the citizens of Alaska. The safety of our citizens may be in jeopardy. Thank you for your time. Zachary Coss, Ward Cove AK

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [Alaska Online Public Notices](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...
Date: Friday, January 10, 2020 3:54:38 PM

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development](#).

Submitted:

1/10/2020 3:54:27 PM

Ketchikan, AK, US
Anonymous User

Comment:

Destroying Alaska, one program at a time. Ha! Dunleavy you are a joke. Stripping apprenticeship programs in our state does nothing but leave your constituents with shotty infrastructure, kind of the same way you are about to leave our state. I am embarrassed to be an Alaskan since you got into office. Apprenticeship programs have been around since statehood. We are proud to be the middle class. We are proud to do work the right way, and more importantly the safe way. I oppose the proposed regulations to increase journeyman to apprenticeship from 1:1 to 10:1.

Apprenticeship programs give Alaskans opportunities to work and succeed in the state they grew up. Don't lower our Standards!

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: [alaskanow](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 8:48:40 AM

From: [Alex C](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Anti-apprenticeship regulations
Date: Friday, January 3, 2020 12:25:08 AM

Dear Commissioner Ledbetter,

I oppose DOL's proposed anti-apprenticeship regulations. These so-called regulations will place workers at greater harm. Please put a stop to these efforts.

Sincerely,

Alex Chung

From: [Alexander Gudschinsky](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship changes
Date: Monday, January 13, 2020 12:28:07 PM

January 12, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Alexander Gudschinsky and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

I'm a first year apprentice of the pipefitters, and I've already seen many classmates fired and out of the program. It is that way for safety. If unsupervised and untrained workers are allowed to become journeymen, my jobs will become much more dangerous.

I'm an apprentice, and I think no apprentice should work without a journeymen.

Sincerely,
Alexander Gudschinsky

From: [Amber Cartier](#)
To: [Harlan, William C \(DOL\)](#)
Cc: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Regulation Changes - Clarification
Date: Wednesday, December 11, 2019 2:38:23 PM

Mr. Harlan,

Good afternoon. I have a question regarding the changes.

In section 8 AAC 90.165 – In order for someone to obtain a trainee certificate of fitness must they still be indentured into an OA accredited program?

Or will a person enrolled in an apprenticeship now fall under a “student trainee” since we are a federally registered education program?

Thank you,
Amber

Amber Cartier

Director of Apprenticeship

301 Arctic Slope Ave., Suite 100

Anchorage, AK 99518

Business: (907) 565-5690 **Fax:** (907) 565-5645

Email: amber@abcalaska.org

www.abcalaska.org



ABC's APPRENTICESHIP PROGRAM EQUAL OPPORTUNITY PLEDGE

The recruitment, selection, employment and training of Apprentices during their apprenticeship shall be without discrimination because of race, color, religious creed, sex, sexual orientation, gender, gender identity, gender expression, national origin or ancestry, marital status, registered domestic partner status, age, physical or mental disability, medical condition, genetic information, pregnancy, childbirth or related medical conditions, military and veteran status, a person over 40 years old or older, or any other status protected by law. The program sponsor or the sponsoring employer shall take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under Title 29 of the Code of Federal Regulations, Part 30, as amended.

From: [andrew.nurmi](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and jobs-say no to proposed regulations
Date: Sunday, January 12, 2020 5:30:22 PM

From: [Andy K](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 12:13:37 PM

From: [Angela Showalter](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Please keep Alaskans safe!
Date: Sunday, January 12, 2020 10:03:25 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Angela Showalter I am a plumber's wife and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

It's dangerous enough already!

Sincerely,
Angela Showalter

From: [Angela Showalter](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Keep Alaska Safe!
Date: Sunday, January 12, 2020 10:00:15 PM

January 12, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Scott William Showalter and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Scott William Showalter
Local 375

From: [Ann Binnian](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Wednesday, January 8, 2020 11:01:18 AM

From: [April Lewis](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changes to Title 8
Date: Monday, January 6, 2020 8:58:38 AM

Becky Weimer,

I am writing to submit public comment on the proposed regulation changes under title 8, affecting apprenticeship programs & number of trainees to journeyman ratios. These changes lower education & safety for our state's workforce & **should not be approved**. Please note my input on this matter & the hazards these changes propose for our state's workforce.

Thank you

April Lewis
3605 N Diana Ave
Palmer, Alaska
99645

From: [Aspen Marlin](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 4:47:42 PM

From: [Aubrey Birdsall](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 7:35:15 PM

To whom it may concern,

I am writing this email in grave concern about the proposed changes for said regulations.

As a wife and a friend to our lineman community I am sick with worry on what the impact and, possibly, deadly consequences these changes will and could bring. My husband, along with his brothers and sisters, have learned, trained, and crafted their profession with pride in a safe work, training environment. They are proud to call themselves journeymen linemen as they have earned that privilege with blood, sweat, and tears. We have always highly spoken about the IBEW and have suggested to many to check it out and join the trade. How can I in good conscience do that now when the safety of future apprentices and my husband and friends are at stake?

Please reconsider the proposed changes to the regulations so that our husbands, wives, friends, and neighbors can safely come home every day.

Sincerely,
A. Birdsall

Sent from my iPhone

From: Austin Deehan
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Wednesday, January 15, 2020 11:10:08 AM

From: [Barret Brown](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 4:51:32 PM

From: [Becky Moeller](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Safety workers and me as a tourist
Date: Friday, January 3, 2020 10:30:20 AM

From: [Ben Dunham](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 6:43:40 AM

From: [Bink Haines](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: FW: Opposing Proposed Changes
Date: Friday, January 10, 2020 9:56:05 AM

Dr. Tamika L

I am writing to the great concern I have over the recent proposed regulation changes the Alaska DOL is seeking to make regarding apprenticeship standards and licensing requirements for the Plumbing industry. I personally have over 32 years of experience in the Plumbing Industry here in Alaska. I attended my apprenticeship here in Fairbanks and completed the 8,000 hours along with the 1600 hours of classroom time. I feel that the state's current standards should be the minimum for training quality craft personal. I have seen lots of apprentices go through the current apprenticeship and turn into knowledgeable and capable Journeyman that perform Plumbing installations in a safe and professional manner. The federal standards require a 1:1 Journeyman to apprentice ratio and the state currently does a 1:2 ratio which is already below the Federal standards. Now you want to go to a 1:10 ratio. This is not safe let alone the apprentice does not get any quality training. What you are doing is exposing untrained people to a hazard of when you have that high of ratio. What are your reason for allowing this high of a ratio? You are now proposing doing away with the current Certificate of fitness and going to some type of training program. This will allow just any person to enter in as a trainee and will not be required to meet standards or proper training. Plumbers are supposed to be trained and understand what it means and how to install Plumbing components properly and safely. Building and Homes will not be installed properly and could cause them to burn down or just not work properly. How will you insure that people have been given the proper training and understand the code with your new proposed changes? I urge you to leave the current system the same and not go forward with the proposed changes. We should be working to improve our current system for Electricians and Plumbers, not lowering the standards which will cause the loss of Alaskan lives

Sincerely,

Francis Lee Haines Jr.

North Pole Alaska

From: [Bink Haines](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Cc: dol.lss.regulations@alaska.gov
Subject: Opposing Proposed Changes To
Date: Friday, January 10, 2020 9:36:44 AM

Dr. Tamika L

I am writing to the great concern I have over the recent proposed regulation changes the Alaska DOL is seeking to make regarding apprenticeship standards and licensing requirements for the Plumbing industry. I personally have over 32 years of experience in the Plumbing Industry here in Alaska. I attended my apprenticeship here in Fairbanks and completed the 8,000 hours along with the 1600 hours of classroom time. I feel that the state's current standards should be the minimum for training quality craft personal. I have seen lots of apprentices go through the current apprenticeship and turn into knowledgeable and capable Journeyman that perform Plumbing installations in a safe and professional manner. The federal standards require a 1:1 Journeyman to apprentice ratio and the state currently does a 1:2 ratio which is already below the Federal standards. Now you want to go to a 1:10 ratio. This is not safe let alone the apprentice does not get any quality training. What you are doing is exposing untrained people to a hazard of when you have that high of ratio. What are your reason for allowing this high of a ratio? Your are now proposing doing away with the current Certificate of fitness and going to some type of traing program. This will allow just any person to enter in as a trinee and will not be required to meet standards or proper training. Plumbers are supposed to be trained and undrstand what it means and how to install Plumbing componets properly and safely. Building and Homes will not be installed properly and could cause them to burn down or just not work properly. How will you insure that people have been given the proper training and understand the code with your new proposed changes? I urge you to leave the current system the same and not go forward with the proposed changes. We should be working to improve our current system for Electricians and Plumbers, not lowering the standards which will cause the loss of Alaskan lives

Sincerely,

Francis Lee Haines Jr.

North Pole Alaska

From: [Bob](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Oppose new regulations
Date: Sunday, January 12, 2020 6:52:16 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Robert Schruf and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Robert Schruf

Sent from my iPhone

From: [Bob and Pam Funk](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Certificate of fitness proposed regulations
Date: Friday, January 10, 2020 10:41:36 AM

From: [Bob MacKinnon](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Certificate of Fitness New Regulations
Date: Wednesday, January 8, 2020 9:51:27 AM

Dear Commissioner Ledbetter:

I am writing in regards to the recent changes to the student trainee certificate of fitness regulations. I am a small electrical contractor that employs between 5 - 20 electricians at any given time. I am struggling to understand the benefit of the new changes, specifically:

1. Student Trainee COF

My understanding is that these "students" do not need to enroll in any type of a legitimate training course? I see this as simply cheap labor, the SOA gets \$250.00 and any employer that needs warm bodies to keep a job afloat can grab them without any real investment in these employees. This regulation is ripe for abuse by the employer and undercuts any company that is looking for quality over quantity.

2. Journeyman to Apprentice Ratios

"Ten student trainees for every certified journeyman"? A 10 - 1 ratio leaves a 90% chance of serious mistakes. Even the best of journeyman would be overwhelmed with that many trainees. In the retail business or ticket sales at a movie theater this may seem like a doable idea, however in the trades where serious injury, death, or at the very least a faulty installation can happen easily. This is a sure recipe for disaster.

These new proposals seem very short-sighted. Who they may benefit is a mystery to me, it surely isn't the public, the employees, or in my view any employer looking to provide quality to their customers as well as the people they hire.

Thank you for your time,

--

Bob MacKinnon

Alaska Electric
PO Box 33835
Juneau, AK 99803
(907) 988-8080

From: [bob.peters](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 7:45:03 PM

From: [Bobby Taylor](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Sunday, January 12, 2020 8:17:10 PM

I am in firm opposition of the proposed regulation changes to the plumbing, electrical and lineman skilled trades. Diluting the licensing and apprenticeship requirements will most definitely contribute hazards to the public as well as the work place. Alaska needs more Alaskan skilled workers, the proposed changes will allow workers to work into the title of a tradesman without the skills and knowledge of the trade . And worst yet train the future generations.

Bobby Taylor
P.O.Box1096
Soldotna Ak 99669
(907)398-6317
Sent from my iPhone

From: [Bonnie Nichols](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship training regulations
Date: Monday, December 30, 2019 11:41:04 AM

To Whom it may concern;

I am writing to express my concern that the Department of Labor's proposed regulatory changes are not in the best interest of workforce development in the State of Alaska,

DOL would eliminate apprenticeship standards for electrical, plumbing and pipefitting occupations that have been in place for the past fifty years and allow a massive increase in the number of "trainees" who could be supervised by journeyman workers.

These professions are inherently hazardous occupations and reducing requirements now in place in union apprenticeships could lead to additional deaths.

The proposed regulations would also have a negative impact on returning veterans who currently have access to important career ladders through the IBEW and Plumbers and Pipefitters unions to help transitioning service members enter these trades.

I highly urge the administration to withdraw these poorly thought out regulations and to continue to work with our trade unions to provide a highly competent and safe workforce in Alaska.

Sincerely,

Bonnie J. Nichols
Soldotna, AK

From: [Bowen Webb](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 4:32:32 PM

From: [Bradford Hartman](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 8:07:37 PM

From: [Brandon McGuire](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: DOL Proposed Reg Changes
Date: Friday, January 3, 2020 12:00:33 PM

Hello,

I'm writing today to express my staunch opposition to the proposed regulation changes affecting the plumbing and electrical skilled trades. Both the proposed changes in apprenticeships and licensing are ridiculous and will only hurt the state in the long run. It's obvious that whoever came up with this idea has no clue what they are doing. This will negatively impact workers, non-union and union alike, as well as Alaskan contractors. In a downturn economy like we have now, the last thing the state should be doing is knee-capping the employers and workers who contribute to this economy.

Just because some housing authority wants to build modular homes using free labor doesn't mean we sell out private industry. These changes bring a whole new meaning to the phrase "Alaska is open for business."

Brandon McGuire

From: [brandon mckechnie](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Thursday, January 9, 2020 2:24:55 PM

Dear department of labor, I am a book 1 journeyman telephone lineman through unit 101 (anchorage) and have completed the IBEW's apprenticeship program, from first hand experience I can say without the IBEW and the strict training regulations the apprentices go through there will be construction accidents/death's, workman's comp would skyrocket and contractors couldn't afford to work here. I had proper guidance, training and spent over 8000 hours supervised, there is no way 1 journeyman could keep his eye on 10 individual apprentices, trust me I'm a journeyman and have a tough time keeping track of 1-2, there is so many hazards that can and will happen and not having the 1:1 ratio which insures proper training to mitigate these situations there will be consequences, of all trades to lessen their strength, the lineman who built this grid and maintain it who risk there lives to make sure your lights are on and you can comfortably sit at home, while there out in -30 plus wind, away from there families, friends and loved ones, and the plumbers who make sure we have water and heat, the essentials of life, the only person benefitting from this will be the crematory, it's sickening. Thank you for your time

Sent from my iPhone

From: [Brannon Nichols](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Certificate of Fitness Changes
Date: Tuesday, January 7, 2020 3:44:50 PM

To Whom It May Concern,

I am writing to you today about the proposed changes to the Certificate of Fitness. Why would we loosen requirements to obtain certification in some of the most dangerous jobs in the State? Changing ratios on the workers to Journeyman to levels that cannot be properly supervised would appear to be inviting accidents and errors in craftsmanship.

We want a skilled work force to work in Alaska. It has some of the most demanding environments in the world to work in. Lowering the standards required would be like changing a high school diploma to a elementary level. The tradespeople in this State deserve better than this race to the bottom.

Please do the right thing and abandon these ill advised changes. Peoples lives depend on this.

Brannon Nichols
Born in and resided in Alaska since 1978
Journeyman Power Lineman.

From: [Brenda Birdsall](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Saturday, January 11, 2020 4:03:45 PM

I am writing to express my opposition to the regulatory changes affecting the plumbing and electrical skilled trades. As a mother of a son who is an electrical lineman; as well as one who ran a family electrical contracting business with my husband years ago: I have firsthand experience knowing how dangerous the electrical trade can be. Even with the current skill level requiring several hours of apprenticeship with 1 to 1 supervision of a LICENSED JOURNEYMAN lineman; this is a very dangerous profession working with live (deadly) electrical currents. Please research a recent incident where a fellow lineman was seriously injured; now living with his disabilities; not more than 16 months ago. This happened in our hometown of Fairbanks AK . Even with the best trained, accidents still happen. With the new changes; are you going to put an inexperienced ; untrained lineman with no apprenticeship (on the job training) to be in the bucket with others? Not only is his life in danger but all his co workers who may not know how to respond in an emergency to save his and their own lives.

Needless to say the proposed changes in apprenticeship and licensing are not only ridiculous but unsafe . It will hurt Alaska in the long run. It will negatively impact the workers as well as the Alaskan contractors. More unsafe working conditions, with more at risk employees and increased liabilities , lawsuits not only to the contractor but to the State of Alaska.

Please reconsider this proposed regulation. Safety should be Number 1: whenever someone sitting at a desk in a safe environment wants to make changes tp these very important regulations!

Thank you for your time and attention.

Sincerely
Brenda Birdsall
Fairbanks, AK

Since

From: [Brent Michalski](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 11:31:25 AM

This is not going to fly. Any apprentice needs to actually have the training in there specific field. For me I was a hvac tech, I could have just been a pipe installer where all I did was hang pipe but never learned how to actually work on hvac unit. I feel you need to have showed you have performed specific training in your field, for plumbing say need to have hours doing waste vent, pipe fitting, copper, gas piping, sanitary, etc. In order for an apprentice to learn with out putting other lives in danger they need to work closely with a journeyman. I see why people want the 10:1 ration for apprentices to journeyman for large commercial new install but you have to understand you aren't doing that apprentice any favors by limiting his time spent 1on1 with a Journeyman. Quit trying to cut corners by lowering standards in a time where their is a skills gap and you are trying to fill that void. It's like trying to send a doctor to a 4 year college rather than the standard 8 year college. This is a trade that needs respected and people who aren't in the trade trying to pass these stupid bills need to realize these jobs are dangerous, require intelligence and proper training.

Thank you. I do not way any of these bills passed

Sent from my iPhone

From: [Brett Straub](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Regulation changes
Date: Monday, January 13, 2020 9:12:47 AM

From: [Brian Armagost](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Opposition to proposal
Date: Monday, January 13, 2020 9:27:42 AM

I am voicing my opposition to the *December 4, 2019 – Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler, and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the regulations of the Department of Labor and Workforce Development.*

The proposed changes reduce the training required to technical trades. Increasing the availability and quality of training should be the goal of the state. Instead the current administration is simply lowering the bar for training and education. This proposition artificially inflates the numbers representing qualified tradesmen and replaces them with the dangerously inept.

The trades affected build and maintain critical elements of our infrastructure. Without qualified workers the quality of construction will suffer. The effects of low quality construction is well documented from the pipe line years, and to this day we are left repairing and maintaining substandard construction. Projects not properly constructed by qualified professionals will have negative consequences for the future of our state.

Most importantly the dilution of proper training seriously reduces safety. The current system of training has been paid for literally, in blood. This administration shall bear the burden for increased injuries and fatalities produced by this proposition.

Thank you,

Brian Armagost

From: [Bruce Laiti](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship Standards
Date: Sunday, January 12, 2020 10:34:22 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Bruce Laiti, and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Bruce Laiti

Sent from my iPhone

From: bruce232@juno.com
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: apprehdship
Date: Thursday, January 9, 2020 10:39:08 AM

From: [Calvin Bell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 3:08:41 PM

From: [Cam Farrally](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: Sen.Cathy.Giessel@akleg.gov; rep.lance.pruitt@akleg.gov
Subject: Proposed regulation changes
Date: Friday, January 3, 2020 2:37:43 PM

Hello,

I've been reading some proposed changes by the DoL dated 12/4/19, and there are some extremely concerning things in there.

The proposed regs and faq are here:
<http://labor.alaska.gov/commish/regindex.htm>

One of the biggest things I saw there was the establishment of a 10:1 ratio of trainees to licensed journeyman.

I have been a Telecommunications CO/PBX journeyman since 2012, and began my apprenticeship with the IBEW in 2007. I have been a part of many large projects in the Anchorage area:

- The Providence Hospital S tower and M (labor, delivery, and NICU wards) tower
- The UAA Nursing building
- The Alaska Airlines Center
- The Centerpoint and Centerpoint West buildings
- housing on Fort Rich
- The ALCOM (Alaskan Command) building on Elmendorf
- The AT&T underground fiber run from Glennallen to Delta Junction that is leased by ACS and GCI to provide a critical piece of redundancy for our state's communications infrastructure.

My trade is not licensed by the DoL, but it follows the same rules by negotiated contract that electricians do. It's important to note when looking at these regulation changes that none of these trades work in isolation, especially on large jobs. They are all performing large scale work, with heavy equipment, hazardous materials, dangerous tools and processes - simultaneously.

It's working and training under the care and supervision of a journeyman that keeps people from dying on these construction sites. It's not a classroom. It's real and the consequences of diluting a journeyman's attention to 10 apprentices WILL be fatal.

This proposal is ill-advised and its intention is to save money for contractors (and project financiers) by allowing them to take advantage of cheaper labor.

I've personally been shocked by 277V electricity from a circuit that was supposed to be locked out (but wasn't) by an unsupervised apprentice. I've seen a plumbing apprentice get severe burns on his face from a steam pipe fitting that wasn't tightened properly, and, as a result, fall off a 10 foot ladder onto a concrete floor. I've seen all manner of cuts and lacerations that require stitches from sharp edges, debris, improper use of tools. I've even, when I was a low-hour, inexperienced apprentice, been hit by the bucket of a backhoe that was being operated in a manner that I now know to be unsafe - operated by a guy that shouldn't have been operating, but was allowed by a contractor that wanted to save money. I was lucky

to get away from that experience with a partially dislocated ankle but no permanent damage.

Did you know the IBEW was formed to fight for worker safety because at the time (the 1890's) being a power lineman was the most dangerous job on earth? The on the job mortality rate was literally 1 in 3. I know there is a lot of stigma with unions and greed, and a lot of political bitterness, but it's important to remember why they exist. And they also define the standards our non-union counterparts operate by.

Diluting trade worker training and safety regulations is no trivial, partisan, or budgetary line item issue. It's the lives of your fellow Alaskans. Proper training, both on the job and in the classroom, is absolutely paramount to protect the lives of tradespeople.

I urge all parties involved to strongly consider voting against these proposed regulation changes. It's not hyperbole to say it is a life and death matter.

Thank you for your time,
Cameron Farrally
2441 Hastings Ln
Anchorage, Ak

From: [Carl Gebhardt](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: changes to DOL regulations
Date: Friday, January 10, 2020 3:09:12 PM

To whom it may concern,

As a journeyman lineman I am highly opposed to this new change. Lineman spend years learning and mastering our craft which is one of the most dangerous and safety conscious trades in the nation. The mere thought of allowing someone who is not tested to enter into this workforce to me is asinine. I understand that you not being a lineman or having any understanding of what we do this may sound like a good idea but I assure you your gravely mistaken. I personally have been the person to bring one of my co-workers out of the air dead. A brother that was trained and extremely competent. To bring in workers who are not trained will not only cause hazards to themselves but to all those involved. This is one of the worst ideas I've heard of. We need to have trained and tested professionals when it comes to such a dangerous line of work. I hope this reaches the ears of reason for you. Thank you for your time.

Sincerely, Carl Gebhardt Journeyman Lineman IBEW 1547

From: [Carrie VanDeHei](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 3:10:51 PM

To Whom it may concern,

I'm writing today to express my opposition to the proposed regulation changes regarding apprenticeships. These changes directly impact the safety of our skilled labor workforce. By altering apprenticeships you take away a time tested method of training and passing of skills from a tenured workforce to the younger generations. Increasing the ration of apprentices to journeymen creates an environment that jeopardizes worker safety, increasing job related injuries and deaths. Its not feasible to expect one journeyman to mentor 10 student trainees at once and provide them with meaningful training or the necessary skills to create well-rounded, knowledgeable, safe journeyman. During my tenure working at an USDOL sanctioned IBEW electrical apprenticeship school here in Alaska, I saw young men and women develop their skills and knowledge while creating a meaningful career that sustains their families in our challenging local economy.

Current licensing regulations for journeymen and apprentices must be maintained.

Thank you for your time,

Carrie VanDeHei
PO Box 10755
Fairbanks, AK 99710
907-378-5514

From: [Casey Stokes](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 12:02:09 PM

To whom it may concern,

I am a member of the IBEW and did an apprenticeship which had both on the job training and academic classroom portions. I think it would be a huge mistake and a disservice to future Alaskans if you do away with apprenticeships or change the journeyman to apprentice ratio.

Electricians and Plumbers are great career choices for young Alaskans as the rules currently sit. If the proposed changes are adopted there will be a “watering down” of the quality of training, the work place will be less safe, and ultimately the quality of work and training will be affected by this.

There is a nationwide shortage of trades people and it is expected to get worse. I think if instead of flooding the “system” with unsupervised apprentices the state could start programs to recruit Alaskan high school graduates into the trades where they can earn money the first day on the job versus going to college and incurring huge debt before starting their careers

Thank you for your time and please consider the decades of hard work fought for to get these current standards in place, it would be a shame to change that all with the passing of this proposed changes

Casey Stokes
P.O. Box 822
Ward Cove, AK 99928
907-617-2409

Sent from my iPhone

From: [Cathy Jones](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: We need apprenticeships
Date: Tuesday, December 17, 2019 12:20:00 PM

From: [Charlee Ruhl](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to Alaska Statute, Title 8 requirements
Date: Monday, January 13, 2020 2:13:45 PM

To Whom It May Concern,

My name is Charlee Ruhl and I am a Telecommunications Construction Engineer and lifelong Alaskan. I appreciate the opportunity to express my objection to the proposed changes to Title 8. Whether the view held is pro-union or anti-union, the following reasons to oppose these changes are about safety, the quality of skilled labor, and the future of Alaska.

Coming from a family of journeyman electricians, journeyman power linemen, and journeymen communication workers, I have seen first hand why safety is of the utmost importance in any field. All of my family members who are now journeymen completed the rigorous and thorough training through their respective apprenticeships. During that time, the journeyman to apprentice ratio was safe and reasonable, 1:1. To think that a young person, perhaps right out of high school, may be essentially unsupervised, with the proposed [1:10](#) ratio, is horrifying. Unfortunately, it can only be presumed that the individuals proposing this change are extremely unaware of the work that actually goes on at a work site. Even tasks of a job that are seemingly "less risky" have a risk of injury or death, to the workers and to the public, and require high quality guidance and education.

Another opposition to this change is the idea that anyone, after 6 years, can take the state test and become a journeyman in the field. It would be terrifying if a Nurse's Aide, who has a very limited scope of practice, was able to become a Surgeon in 6 years, just based on the fact that they worked in the Operating Room, shuttling patients to and from their operations. This would never be acceptable, and neither should the changes proposed to Title 8. A material handler for a power company absolutely should not be able to work on high voltage power lines without any amount of training. It should not even be considered.

Some may counter this point by arguing that a person would still have to pass the state test and "prove" themselves on the job site, after their 6 years of "experience". However, with enough tailored studying, a test can be passed without the actual experience and knowledge that is accumulated over extensive training. Additionally, although unfortunate, it is not unheard of an employer that may or may not follow up on the quality, let alone the safety practices, of their workers. Essentially, you may have an individual that retains just enough information to pass a test, then forgets or neglects it all once they have a job and a source of income. This is not the kind of worker anyone should have on a crew.

Regarding income, skilled labor, especially the labor that comes from apprenticeships, is some of the higher paying fields in the state. Skilled labor is often more expensive than unskilled labor (what the changes are proposing) but it is also without a doubt the highest quality of work. The changes proposed will indeed jeopardize the quality of work that this state needs. Additionally, as I have personally seen in my profession, the use of "cheap" and unskilled labor in all cases, ultimately results in more, often much higher, expenses down the road to reconcile negligent work. If the arguments against these changes regarding safety aren't enough, perhaps a discussion on the economic effects would open one's eyes to the multitude of weaknesses of the proposed changes to Title 8. Furthermore, as labor become less and less skilled, the competitive market the state currently has for construction and labor will dwindle,

negatively affecting the fair wages, benefits, and livelihoods of not only the workers themselves, but of their families and their communities.

Without standards of safety and strict qualifications that the state currently has, working crews lack the support, education, and resources necessary to work safely and effectively. The state of Alaska deserves the highest quality of work, and the workers of Alaska deserve the safest environments to provide it. Please withdraw the proposed changes to Title 8, and help our friends, parents, children, and spouses come home safely every day.

Sincerely,

Charlee Ruhl

From: [Charles Neville](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Wednesday, January 8, 2020 4:28:21 AM

From: [Charles Scantlebury](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Public Comment to DOL changes
Date: Monday, January 13, 2020 7:44:28 AM
Attachments: [DOL Revision Statement-C.Scantlebury.docx](#)

Charles Scantlebury
4th Year Electrician Apprentice

Gov. Dunleavy
State of Alaska
Department of Labor

January 13, 2020

Dear Governor Dunleavy,

It's with a heavy heart I write this letter. The proposed changes to the DOL regulations regarding the trainee license requirements of the electrical and plumbing trades create an unmanageable and ineffective system. They will affect the future of a highly skilled workforce by favoring seniority and cheap labor. Without the training I've received from my apprenticeship, I wouldn't be confident, educated, and motivated to continue these traditions for future apprentices to come. Creating an avenue to circumvent the apprenticeship requirement to any of these licenses with is irresponsible and dangerous because this related work requirement is too broad. These trades are too dangerous to allow anyone with 12,000 related hours and no journeyman's card. Motivated individuals willing to apply themselves in their trades and learn the principles and earn-while-they-learn through these existing registered apprenticeships should be where we put our focus. Don't take from motivated Alaskans willing to learn safe work practices, as opposed to a 10:1 student trainee to journey worker ratio and pay-to-work public programs (Job Corps, Avtec, UAA, or even ASD)

Workers that do not have formal training through these registered apprenticeships tend to carry bad habits and teach unsafe work procedures to others in the future. These programs were established to create professional workers, with emphasis on safety and diligence. I will not stand by to see my lifelong State degrade it's labor practices in such a way to cripple a secure apprenticeship system with a proven record of success.

Don't fix what's not broken.

Sincerely,
Charles Scantlebury

From: [Charles T. Milton](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: purposed changes for department of labor
Date: Friday, January 10, 2020 3:31:35 PM

Hello my name is Charlie Milton. I believe the purposed changes for the electrical field workers is a very a bad idea. I believe the ratio of journeyman to apprentices or helpers does not need to be increased. I have worked in the electrical industry for over 20 years. Even with the ratio the way it is there are many mistakes made that could cause injury or even death. If the ratio's where increased I do not think the mistakes would be caught until it was to late. Some times job sites are very busy and you barely have time to check one apprentices work thoroughly to make sure it is done correctly. I think filling jobs with unskilled labor will cause many mistakes and result in unsafe conditions for the occupants of the buildings once construction is complete. I also think it will put journeyman out of work in the state of Alaska. Forcing them to look for work out of state Alaska will be left with a shortage of skilled labor in the long run. Please do not go forward with these changes.

Thank You
Charlie Milton

From: [Charmalee Howard](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Thursday, January 2, 2020 3:41:43 PM

I find it disturbing this attempt to create unsafe working conditions for trainees and undermine the extensive training needed to be proficient, productive and safe. Your efforts in this will result in a workforce devoid of expertise and an environment that will allow employers to underpay for work.

This will only devalue the working and living conditions in Alaska and put us on a path where no one will be able to afford to live here. I know you think this will create more jobs, and in the short term you may be correct but in the future we will all be living in tenements because there will no longer be jobs that will let you afford to go to school, buy a home or support a family without government assistance.

I see this administrations attempts to cause havoc in all industries and move in out of state workers to push out the unions and destabilize the workforce so that you have the power. Why would you want to turn this state into another Alabama? You would be better off getting back our money from the give aways to the big oil companies.

The only thing these policies will do is create Haves and Have Nots.

Please protect our future and the future of our children by protecting safe work environments, training from respected apprenticeship programs, and jobs that will pay a living wage.

Charmalee Howard
7829 Spruce St
Anchorage, AK

From: [chip.curry](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeships
Date: Tuesday, December 17, 2019 3:26:21 AM

From: [Chris M. Shorey](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation changes for apprenticeships
Date: Friday, January 10, 2020 11:00:43 PM

I came into the Electric Trade in Colorado where the ratio of apprentices to Journeyman was 1/1 before it was changed to 3/1, provided the Journeyman did not work with tool. I witnessed repeated violations of the ration both before and after the changes. The most noticeable effect the ratio changes had on the tradesmen and the quality of work, was the increased hunger for cheap labor, to the extent that many companies, especially residential, would continuously turnover there more experienced workers nearing or having achieved journey status. The result is that there was an ever decreasing supply of experienced worker resulting in poor quality work. It also resulted in fewer workers being able to make a career in the trades and a rapid expansion of undertrained workers whenever there was a boom in the economy. This may sound like a benefit to the trades, but is results in excessive undertrained and underqualified workers performing critical work on the homes and buildings we live and work in, making the environments we and our families depend on to be safe less safe than before.

I beg you not to adjust the ratio of apprentices, or students to such an extreme imbalance. Not only does it diminish the quality of the workforce to substandard levels, but it also threatens the safety and wellbeing of everyone. The only reason to make such drastic changes is pure greed from the contractors and builders who desire a CHEAP WORKFORCE and care little about the building surviving past the initial short warranty.

To pass the proposed changes in the training programs would be a degradation the the workforce and the quality of life for all of Alaska.

Thank you for your consideration,

Chris Shorey

Wireman- E/I & C tech.
GVEA-Healy Power Plant;
PO Box 297, Mile 2.5 Healy Spur Road
Healy AK 99743-0297
907 683 8328 main

907 683 8321 direct
cms@gvea.com



From: [Chris Sexton](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship
Date: Wednesday, January 8, 2020 2:15:02 PM

Electrical and Pipefitter/ Plumbing apprenticeships keep up the standard for workers and the much needed quality of our future workforce. Please do NOT think about reducing these much needed programs.

Chris Sexton
907 590-3056
Fairbanks

Sent from my iPhone

From: [Christian Vasquez](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: No New Job Regulations!
Date: Saturday, January 11, 2020 11:32:29 AM

From: [Clayton Bessette](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 3:56:14 PM

I strongly disagree with the Alaska Department of Labor proposal to change regulations for Plumbers, Lineman, Wireman and the Apprenticeship Standards for the respective skilled trades. The existing regulations in place are for the safety of the Public and the workforce that installs them. To remove regulations exposes the public and the workforce to severe and even fatal accidents. I strongly encourage the State of Alaska Department of Labor and Workforce to concentrate on how to enforce current regulations instead of removing them.

Respectfully,

Clayton Bessette

UA Local 375 Plumbers & Pipefitters
Business Agent
3980 Boat St.
Fairbanks, AK, 99709
907-479-6221



From: [CloudRinger](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 5:20:46 PM

To Whom it May Concern,

I am in direct opposition to the proposed legislature to end the apprenticeship program. I am an instructor for Plumbing and heating and Refrigeration. I can not imagine being able to keep ten apprentices on a live, real job site safe and on task with no training. I am the precursor to my students stepping in to an apprenticeship position where they can learn to be safe, active members in the trades. I myself came up through an apprenticeship with eyes and ears always available and on site to aid me through my career until I was certified and tested to be able to set upon these extremely dangerous and life saving tasks. There is no way one person can keep ten leigh man safe and on task. Some thing will get missed. This thing could literally kill my countrymen.

Thanks for your time,
Brother CloudRinger of the Local 367

From: [Cody and Mariah Alexander](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 5:12:25 PM

To whom it may concern,

My name is Cody Alexander I am a journeyman lineman. I have been in the trade for the last six years. I strongly oppose the new regulations that are trying to be passed. The line trade is very dangerous, it is important to have a solid apprenticeship to educated workers on how to work in this trade, safety is by far the largest part of this. With out accredited apprenticeships to train line workers the mortality rate is going to jump through the roof; craftsman ship is another very important part of this, knowing how to build a product that is going to last and not set traps for future line workers to work on these systems. The states current fitness card requirements has required lineworkers to go through accredited apprenticeships. These new guidelines are unacceptable. Passing these new laws would only harm Alaskans and the electricity that they rely on. The only correct answer is to vote no. Thank you for your time.

-Cody Alexander

Sent from my iPhone

From: [Collin Cantrell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Thursday, January 9, 2020 1:04:28 PM

From: [corde](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 2:44:10 PM

From: [corey.randall](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Workplace Safety, Proposed Regulations
Date: Thursday, January 9, 2020 12:57:57 PM

To Whom it May Concern,

I'm very concerned with the proposed changes regarding the Certificate of Fitness and the Apprentice/Trainee programs.

I'm a Journeyman Power Lineman and My daily safety is continuously placed in the hands of other highly trained workers in my field. To detract from the training standards in any way whatsoever would be a travesty and would endanger not only me but future workers in this Trade.

On a more personal note, my 17 year-old Son Christopher has dreams to one day become a Lineman. It terrifies me to think that the training standards he would fall under could in fact be inferior to what's in place now.

The accountability system currently in place has worked well for the young trainees coming into the Trade. Please don't deter from these standards as our job is hazardous enough as is.

Corey Randall
(907) 232-5560

Sent from my iPhone

From: cory_bassett2007@yahoo.com
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Opposition to regulations
Date: Saturday, January 11, 2020 3:44:52 PM

I am writing this email to express my opposition to the recent proposals that put my life at risk.

I am a power lineman in the IBEW. I went through a very valuable apprenticeship to gain my journeyman card. I have travelled to the east coast, up and down the west coast, Puerto Rico and Hawaii for work. I was unsure of how I would measure up to the other hands I would be working with while traveling. I quickly found out that the training I received through my apprenticeship put me at a great advantage. I was asked to lead crews due to the knowledge I have of our trade, to get the work completed while looking after the more inexperienced hands on our crews.

There are an innumerable amount of dangerous variables that we encounter during an average day on the job. My apprenticeship has given me the tools to recognize these hazards as they come, to adapt and overcome, and go home safely to my family at night.

Take it from the boots on the ground, it would be foolish maneuver to put a devaluation on our union apprenticeship. You will be putting people's lives at risk and you will be lowering quality and craftsmanship on the job.

Thank you for your time and consideration on this matter. Myself, my family, my union and my community thank you for not placing this burden upon us.

Corwin Bassett
Father, Husband, Son, Brother
Journeyman Power Lineman
IBEW 1547

Sent from my iPhone

From: [Dale Rooney](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to regulations regarding apprenticeship
Date: Thursday, January 2, 2020 5:46:47 PM

From: [Dan Browning](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 11:52:11 AM

From: [dana.carros](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Thursday, January 9, 2020 7:08:42 PM

From: [Daniel Cogan](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Proposed Apprenticeship to journeymen ratio and hours to turn out.
Date: Friday, January 10, 2020 8:43:55 AM

Hello,

As a journeyman electrician, I see the proposed changes as a danger to any construction site. There is no way a journeyman can watch ten apprentices, safely. Also, it is much easier to teach properly one on one. As far as the 12,000 hour apprenticeship, it's a little excessive, unless it makes all Alaskan journeyman reciprocal to all other states. Please do not pass these changes, it will hurt every job site and apprentice wanting to have a career in the trades.

Sincerely,
Daniel Cogan
Lifelong Alaskan

Sent from my iPhone

From: [Daniel Huff](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New regulations proposal
Date: Tuesday, January 7, 2020 8:06:59 PM

Electrician Journeyman Certificate of fitness 00114614
Daniel Huff

I have been in my trade for 30 years. And I can say that many of the tradesman that I work with are highly skilled. They got their skills from training, continuing education, job site safety meetings. I find these new proposals absolutely ridiculous and offensive to all skilled labor professionals. These new regulations will get unskilled newcomers injured or even killed, in some of the more dangerous job sights in this state. More classes, training and safety requirements would be the more effective path for everyone concerned.

My license requires 16 hours of upgrade classwork every two years. I find this requirement helpful in my day to work. And keeps the mind sharp.

Thank you for reconsideration

Daniel Huff

From: [Daniel Wuestenberg](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 10:39:35 PM

After looking over the proposed deregulations, all I can say is this: Increased productivity at the expense of safety is not an increase at all. I've seen firsthand the damage that occurs when one apprentice isn't monitored around energized electrical equipment and how that damage affects the lives and families of all involved. One man or woman coming into contact with energized electrical equipment is not worth the perceived productivity that a 10 apprentice to 1 journeyman ratio may yield.

Sent from my iPhone

From: [Daniella Vasquez](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 8:06:08 PM

The Alaska Department of Labor Regulation's changes to skilled labor apprenticeships endangers lives of workers & the public. We want highly trained workers, not those who can't cut it & need the rules slacked for them. We need to prioritize safety & quality. The changes to regulations are unacceptable. My name is Daniella Vasquez & I've lived in Alaska for 20 years and am a registered nurse. We train our nurses to handle others lives safely & with quality results. The same should go for all other professions. You are reducing the reputation of quality American workers, whose backs our cities & state has been built upon. My husband's life depends upon the education, judgement & skills of his fellow Lineman. Why would we LOWER the standards of training for ANY profession???? Please reconsider, American lives literally depend on the quality of our apprenticeships & training. Thank you.

From: [Dave N](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Molly Sturdevant](#)
Subject: Keeping plumbers and electrical workers safe
Date: Friday, January 10, 2020 11:25:52 PM

To the Dept of Labor.

I'm a 64 year old lifetime Alaskan who has worked his whole adult life in the construction industry since I was 18 years old, starting with the Trans Alaskan Pipeline project. I am writing this to say I strongly oppose changes in the training requirements that helped me and all my coworkers keep safe and alive in what could have been a very dangerous occupation as an electrician. The proposed changes will undoubtedly cost everyone, in time and money, but also in lives too. The work force who must try to come home alive to their families, as well as the customers who assume and rely on a trained workforce to do the jobs they require and assume will be done properly and that work be safe and stand the test of time.

I urge the State Dept of Labor not take this risk filled path.

Dave Nussbaumer
Haines, Alaska

Retired electrician with construction work experience in the State of Alaska since 1974

From: [David](#)
To: [DOL LSS Regulations \(DOL sponsored\); Commissioner"sLabor@alaska.gov](#)
Subject: Dept. of Labor proposed labor changes
Date: Monday, January 13, 2020 11:31:57 AM

To Whom this concerns

I am writing this in opposition to the changes in the labor department regulations that will change the electrical and plumbing licensing and apprentices qualifications. I went through of 1200 classroom instruction and 10,000 hours of on the job training to get my certificate of fitness as an electrician. To change the way to get a certificate of fitness and the learning methods that proved to be safe and insure quality work would be criminal, and potentially harmful to personal and property. There is no way 1 journeyman can efficiently supervises and teach 10 people to work as an electrician or in the pipe fitting trades. If we jeopardize the quality of training we jeopardize Alaska.

In conclusion I request that the commissioner of labor does not change or alter the labor regulations that are now on the books for the electrical and mechanical trades

Thank you

Dave Neuburger

From: [David Berry](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 6:09:15 PM

The proposed changes to title 8 will do nothing but hamper the electrical and plumbing trades. Allowing unskilled "journeymen" to flood the workplace will only dilute our trades skill and allow unsafe work practices to flourish. Without a proper training program in place, the knowledge and know how to properly handle dangerous scenarios will do nothing but put tradesman and customers at risk. Let alone a ratio change from 1:1 to 10:1, the increase for mistakes increases exponentially. Do the right thing, and keep Alaska's skilled trades skilled, and keep title 8 as is.

From: [David Miller](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 11:42:13 AM

First off let me say these proposed regulations are absolutely insane. I have been plumbing for 13 years and I have a question for you. Do you know how hard it is to train some one that has never worked in your field when lives are actually at risk? Having one apprentice is rough. Having two is really hard to instruct, do your job, and make sure they are doing their job properly and safely. The proposed 10:1 ratio is absolutely asinine how is any one supposed to do their job if you have 10 people on the job that has no idea what their job is or how to do it?!

That would be like dropping 10 kids out of high school hopped up on coffee loose in your office, but you have to keep their attention with out sitting them down for class time, and you still have to get your daily job done.

The whole reason there is apprenticeship programs is to ensure your workers are safe, educated, and can prove they have the knowledge of their craft. If these proposed regulations go through I feel like this state will collapse soon after. Skilled trades are about life safety how is any one supposed to be skilled in their trade with out proper education? If some one happens to tie a drinking water line to waste improperly then all of the drinking water for the whole area can be contaminated. Case and point. http://www.nbcnews.com/id/23726402/ns/health-infectious_diseases/t/salmonella-outbreak-linked-tap-water/

I foresee this 10:1 ratio going the way of the old timers who wouldn't teach the new guys because they didn't want to loose their job to the younger newer guys. But then when the old timers were all gone the younger newer guys struggled to hone their craft because they weren't properly educated.

I could go on for days about this. Seriously stop trying to hamstring this state into submission. Do your job we will do ours.

A concerned citizen and former plumber,

David Miller

From: [David Paden](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Wednesday, January 8, 2020 9:00:37 AM

I am writing to express my strong disapproval of the the proposed regulation changes to Title 8 of the Alaska Administrative Code, **eliminating apprenticeship standards for plumbing and electrical trades.**

I am going to give the person/party who has proposed this as good for our Great State the benefit of the doubt that they meant well but are simply, ignorant of the magnitude of folly that it truly is.

I am a licensed Journeyman Plumber and a licensed Mechanical Administrator. I fulfilled my apprenticeship, became a Journeyman, and then a Mechanical Administrator. I have been in the plumbing and pipe fitting trade here in Alaska now for 25 years. I have had many apprentices working under me and to suggest that any one Journeyman could properly and responsibly oversee more than two apprentices at once and still produce a quality product becomes quite unrealistic very fast. Not to mention The State of Alaska is grossly under staffed for Plumbing and Electrical inspectors, so who then will be verifying the public safety?

So an example: A simple but improper piping connection underneath someone's house meant to keep a water service from freezing (because it's a "quick, simple fix") can cause a deadly situation by directly connecting the drinking water supply to the sewer system and exposing the drinking water of the entire neighborhood to every disease it was supposed to be protecting them from. You would think this would be an obvious bad idea but I have seen this sort of thing done by people in the plumbing trade who had NOT been given an education along with their field training. They were good and fast at installing pipe but didn't understand the reasons why certain things are done particular ways. Yet unfortunately at the time of their apprenticeship the only requirement was "on the job training" no "required educational programs" were in place and they had a State of Alaska Plumbing License.

I sincerely hope this does not fall on deaf ears, as this is a Huge public health and safety issue.

Thanks for your time,
David B. Paden

From: [David Wiehl](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New labor regulations
Date: Friday, January 10, 2020 4:10:11 PM

It has come to my attention through our Representatives that the Alaska Department of Labor is proposing new regulations that will in short:

- Remove apprenticeships from several very skilled, important and rather dangerous crafts (Of which have been providing a well trained workforce for the state for years).
- Create an opportunity to fully license individuals with little and possibly inadequate/undocumented/unverified amount of knowledge of the trade, simply based on amount of "on the job" Hours accrued.
- Create a NEW "student trainee" licensing program, effectively increasing the qualified to non-qualified worker ratio from 1:1 to 1:10.

If everything I have read on these proposed regulations are true and adopted, I believe these changes are going to negatively and drastically effect all crafts involved as well as the entire states economy for years to come. The effects will be felt by: quality contractors providing residential, commercial, and industrial construction. Persons wanting to enter a skilled trade/career that provides a safe working environment with quality training and opportunity to provide for themselves and their loved ones for a lifetime. Veterans, who want to enter the workforce through these apprenticeships that qualify them to utilize the GI bill which they have earned by service to our country. By the individual and family of that individual, god forbid, that is a direct cause of injury to his/her self or co-worker in one of these dangerous trades. And by our rather slow economy, which by opening the door to outside workers, will lose possibly millions of dollars which would have most likely been spent in-state (similar to the oil industry and their out of state workforce).

I've lived in Alaska for my entire life. I have been a Power Lineman In the IBEW for 10+ years, and have worked around the state. I know everyone sees the amount of money the individuals in this trade make, but let me tell you, there is a reason that these trades require special skills and an apprenticeship that you must complete in order to perform the work. Why would one try to flood a market with unskilled labor in a trade that is one of the most dangerous in the world, makes no sense to me.

Long Story Short, do you think these changes are going to help Alaskans financially in some way? If so please explain. If you think flooding the market with unskilled and uneducated labor is beneficial to an already deadly trade "Power Line Work", please explain.

If it was a vote...With the information I have, **I STRONGLY DISAGREE** that this does any kind of good for our State.

Thanks for your time

David Wiehl
Journeyman Power Lineman
IBEW 1547

From: [Dax MacMillan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed apprenticeship changes
Date: Monday, January 13, 2020 3:05:09 PM

The proposed changes to the electrical apprenticeship would be detrimental to the electrical industry in Alaska. Removing the state level testing would allow a possibly unqualified person admittance to work on our lines. An unqualified worker has the potential to be dangerous not only to themselves but to other lineworkers on the line. Being your brothers keeper goes both ways meaning that I need to be able to trust the guy I'm working with when there is over 7000V less than 10 ft away. And he needs to be able to trust me. The state level testing and apprenticeship schooling gave the hands the tools to stay involved in the development and learning in the industry to become safe linemen.

The apprentice to journeyman ratio changes would create more problems than it would solve. One journeyman, especially lineman, cannot be watching 10 apprentices. It is dangerous for the journeyman and apprentices. The JL cant keep his mind on his own work, he would have to watch multiple apprentices while doing his own work. Then he would have to go over all their work which would prolong jobs and raise the cost per job.

Thanks

From: [Debra Tjon](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: new regulations regarding Training programs
Date: Thursday, January 9, 2020 9:53:39 PM

I have just read through the newly proposed regulations concerning the complete dismantling of the apprenticeship programs. I can't believe how incredibly dangerous this proposition is. Not only would this poorly thought out plan harm the future of our plumbers and electricians, but the safety issue of putting poorly trained people building critically needed infrastructure. Our state has had one of the highest safety record to date. Now you want to replace trained professionals with people who are either poorly trained or not trained at all. The negative impact not only on Alaskan workers but on Alaska's future as a progressive state. This will no longer be a decent place to live. Not only will this destroy the future of the young workers entering this field, it will enable unscrupulous contractors to take advantage of the loopholes. Training can consist of 12,000 hours of pushing a broom, "student" trainees are basically free labor. Young people trying to get ahead in life will be sold a bill of goods that will keep them in poverty, stealing their future hopes and dreams.

I strongly urge you to pass on the proposed Legislation. It's destructive power will go on forever.

Debra Tjon
19541 War Admiral Rd
Eagle River AK 99577

From: [demond simmons](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: NEW JOB REGULATIONS
Date: Monday, January 13, 2020 3:06:01 PM

Whom it may concern,

My name is Demond Simmons. I am a Veteran whom life changed on the behalf of this VEEP NECA/IBEW Apprenticeship. I pray and hope that my words can help a better cause for hardworking, motivated and dedicated people.

I would like to start off by questioning a person knowledge- How can we trust a person to mess with our environmental electricity? Without testing someone knowledge and understanding of what they are actually doing. With the removal of tests, anybody who think they are competent enough to push a broom for 12,000 hours and never learn anything from the trade of an electrician!

This apprenticeship has helped myself as well as a lot of my brother in arms receive jobs in our future, with the removal of an apprenticeship veterans are losing out on great opportunities the IBEW program has to offer.

The economy will be very weary, unsafe. The IBEW was invented for brothers and sisters to learn the trade and learn the safety of the trade. In order to keep every Craftspeople safe, Henry Miller help invite a great program and died with his life savings.

Please do not take this great opportunity away from people who are motivated to learn the safety and invest a great deal of five years to this JATC!

From: [dennis.kananowicz](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changes to Title 8
Date: Wednesday, January 8, 2020 8:01:58 AM

From: [Dennis Knebel](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fw: DOL Regulations
Date: Friday, January 10, 2020 8:15:34 AM

From: [Dennis Knebel](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: DOL Regulations
Date: Thursday, January 9, 2020 3:17:36 PM

I am writing today to express my staunch opposition to the proposed regulation changes affecting the plumbing and electrical skilled trades. I've been working in the electrical industry for more than 30 years now. I went through an eight thousand hour apprenticeship program with classroom training. I oppose changes to proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1. Licensed trades have time tested these ratios and they work. The proposed changes in apprenticeships and licensing are unnecessary and will only hurt the state in the long run. This will negatively impact workers as well as Alaskan contractors. In my thirty years in the electrical industry I don't know anyone that is in favor of these regulations. I have met hundreds of men and women both employers and employees and union and non-union and we all agree these regulations would take our industry backwards. Current licensing regulations for journeymen and apprentices must be maintained.

Please don't change our apprenticeship regulations.

Journeyman Electrician

Dennis Knebel

From: [Dennis O'Connell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes
Date: Friday, January 3, 2020 3:47:10 PM

From: [Devon Teeling](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 1:44:53 PM

From: [Diana Ruhl](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed change to Alaska Statute, Title 8 requirements
Date: Monday, January 13, 2020 12:18:12 PM

To Whom It May Concern:

My name is Diana Ruhl and I am a lifelong Alaskan. Thank you for the opportunity to express my objection to the Department of Labor's proposed changes to Title 8, requirements for certificate of fitness. There are several proposed regulation changes that I will address separately:

First, the proposed change to allow for a jobsite ratio of 10 "student trainees" to be supervised by 1 journeyman electrician. It is clear that the person proposing this change is woefully unfamiliar with the hazards of performing electrical work and has no practical experience with construction jobsites in general. The electrical trade is not only hazardous while performing the work, but also poses a significant public safety risk if not performed properly. There is no practical way for one journeyman to effectively supervise ten "students". This is evidenced by the fact that the State of Alaska currently allows for a maximum ratio of 2 apprentices to 1 journeyman, and the Federal Department of Labor guidelines that allow for a maximum ratio of 1 apprentice to 1 journeyman.

Second, the proposed change to remove the requirement that a trainee electrician be registered in a federally administered apprenticeship program. This change also represents a significant safety risk for the construction workforce as well as the general public. Oversight of apprenticeship programs by the Federal Department of Labor is crucial to ensuring that workers are protected. Registered apprenticeship programs must have documented standards for training that address requirements such as supervision, type of work experience obtained, related classroom instruction, and more. Allowing anyone to obtain a trainee license and walk on to a jobsite by simply paying a fee to the Department is reckless and ill-advised.

Third, the proposed change to allow for 12,000 hours of "industry experience" that need not be obtained in a registered apprenticeship. This change threatens to weaken the strength of the Alaska journeyman license and risk the loss of reciprocity agreements with other state licenses. This would have a negative impact at a time when our construction industry is still recovering from our recent recession and much of our workforce has been forced to travel for work.

And finally, the proposed change to remove the requirement for a certificate of fitness holder to perform the excavation and backfill of electrical trenches. Excavation and backfill of these trenches requires intimate knowledge of National Electrical Code requirements, such as burial

depth and type of material that won't damage conduit or cable installations.

In closing, apprenticeship programs are a tried and true method for training the future construction workforce. These proposed changes would severely weaken that model if adopted, resulting in unsafe installations and unnecessarily putting our construction workforce at risk. I highly recommend that the Department withdraw these proposed changes.

Respectfully,

Diana Ruhl

From: [DJ Slentz](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship standards
Date: Monday, January 13, 2020 2:53:04 PM

January 13, 2020

Dear Commissioner Ledbetter,

I am writing in opposition to the changes in plumbing and electrical regulations. My opinion on this issue is coming from my experiences in the working field in this trade and the safety hazards that come with our work and how a inexperienced person who could basically walk in off the street and attempt to do this work with out the proper training could cause multiple safety violations and injuries that come with those. We are apart of a very skilled labor group and if you were to take away the licensing and training that way go through just to get more jobs for people what good would it do if those people just end up hurting themselves therefor putting themselves out of work again and not be able to work at all. My union and it's members and myself have invested thousands of hours and thousands of dollars into my training which gives incentive to me to become the best worker in my field that I can. By making this new regulation and bringing unskilled labor in to take away the jobs of very skilled labor just to save money is pointless! We build Alaska and people who aren't making the true commitment that we make with the current regulations they wouldn't need to uphold the standards that we do. To get the job done right it needs to be paid accordingly. Cutting corners isn't going to do anything but waste people's time and money and cause numerous amounts of safety hazards. I hope this letter is taken very seriously and someone will realize the horrible impact it would make in our industry.

Thank you,
Dalton Desrochers
(5th year IBEW apprentice)

From: [Don Rouleau](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship
Date: Thursday, January 2, 2020 2:14:38 PM

From: [Douglas OBrien](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship programs
Date: Monday, December 16, 2019 9:44:02 AM

The apprenticeship programs are there to instill knowledge and the correct way of conducting construction duties with safety in place and awareness for hazards.....

Quit being fools in a world where there is son much negligence on job sites and in the state government as well. Wake up and deLize you are jeopardizing peoples lives by doing away with the apprenticeship programs

Sent from my iPhone

From: [Dusty Menefee](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 10:45:49 AM

It seems very short sighted to remove a requirement to prove proper training and replace it with a notarized statement from any employer saying the employee has meet 12,000 hours, that proves no actual training. Currently an apprenticeship has to turn in a signed affidavit that states an apprentice has 8000 hours of training. Also if the non-union and the union agree this is bad for the state obviously there is something wrong. Honestly I feel the requirements were put into place to be sure we have properly trained workers performing safe and efficient services for the businesses, homeowners and the public of the State of Alaska. This change will reduce the safety to all three, if the guarantee that these works are not properly trained in the safety codes and have the skills to perform their jobs safely.

In closing I feel this is step backwards and needs stopped now. Much like a CEO of a company making decisions on something they have limited knowledge of, it appear this administration is trying to make changes and have no idea of the impacts they will have. If changes are needed talk to the professionals working in that field and get accurate input that make positive changes.

From: [Earl Bennett](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Saturday, January 11, 2020 3:34:29 PM

From: [Ed Flanagan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 13, 2020 11:09:16 AM

I am writing to express my serious concern over the proposed regulation change to the certificate of fitness trainee system. I was labor commissioner when the requirement for participation in an apprenticeship program in order to obtain a trainee CF was introduced. That reg change was supported by labor, and both union (NECA and Mechanical Contractors Association) and non-union (Associated Builders and Contractors-ABC) contractor associations as a means of ensuring that trainees received meaningful training and monitoring of work experience prior to full licensure as journeymen.

Removing this requirement is bad enough, but the proposal to increase the journey to trainee ratio from 1:2 to 1:10 is irresponsible and will greatly diminish not only the quality of trainee programs but will also jeopardize public safety.

Please reconsider and withdraw or substantially revise this ill-advised reg change.

Thank you.

Ed Flanagan
Juneau
907-321-5450

From: [Ella Demoski](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Electrical Standards
Date: Monday, December 16, 2019 9:44:58 AM

From: [Ellen Mannion](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed labor regulations
Date: Saturday, January 11, 2020 8:18:18 AM
Attachments: [DOL changes.pdf](#)

From: Eric Ghegan
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Wednesday, January 15, 2020 11:11:59 AM

From: [Eric Jensen](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Title 8
Date: Friday, December 20, 2019 1:01:15 PM

My name is Eric Jensen and I would like to advise you that our electrical apprenticeship programs are already the weakest in the country and that if you loosen up the regulations any more we not only will see higher fatalities in the industry from electrocutions and fires, but Alaska will be producing the lowest quality electricians and the lowest quality electrical work. You would be burdening the entire state of Alaska. Thank you for your time and consideration.

Sent from my iPhone

From: [Ernie Ackermann](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Dept of labor changes
Date: Sunday, January 12, 2020 4:24:18 PM

From: [Eugene Yerbich](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Save our union apprenticeship it makes for a safer, a better trained work force
Date: Thursday, January 2, 2020 12:54:47 PM

From: [Eugene Yerbich](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: I appose the ending of any apprenticeship program, I strongly feel it would hurt our work force in every way
Date: Monday, December 16, 2019 10:19:52 AM

From: [Florie Travline](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 2:44:25 PM

From: [Francek, Edward C.](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation change
Date: Friday, January 10, 2020 2:11:37 PM

From: [Frank Hernandez](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Propose Title 8 regulation changes
Date: Friday, January 10, 2020 3:56:01 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Francisco Hernandez and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

I began my construction career as a plumber/pipefitter apprentice. The training and instruction I received during my apprenticeship was invaluable and made my success possible. Ending apprenticeship standards for pipefitting & electrical trades will eliminate minimum standards for workmanship and create dangerous working conditions for workers.

Sincerely,
Francisco Hernandez

From: [Gale B. Foode](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Saturday, January 11, 2020 1:05:23 PM

From: [GARY BROOKS](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Comments Submitted in Opposition to Proposed Changes to Title 8 of the A.A.C.
Date: Saturday, January 11, 2020 8:19:08 PM

To Whom It May Concern:

The proposed changes regarding registered apprenticeship requirements in Alaska and adding the new student-trainee section have clearly been proposed by someone unfamiliar with apprenticeship in general or adverse to the nationally recognized and jointly created and administered labor/management programs unparalleled in delivering quality education to American workers for literally centuries.

To propose the utilization of 10 student-trainees to 1 journey level instructor on the job-site of the most hazardous environments in the construction industry can only be contrary to the safety of the job-site worker (journeymen, apprentices and student-trainees) but the public as well and certainly not what the DOL should be supporting.

While a 10-1 student/instructor ratio may very well work and be applicable to a classroom setting, to attempt to carry that ratio over onto a construction job-site performing electrical work covered by the National Electrical Code would put Alaska in a category by itself and certainly alone with respect to nationally accepted norms with respect to apprentice/trainee ratios, a very unsafe and undesirable designation for worker, consumer, and the public.

Coupling the 12,000 hour OJT alternative pathway to journeyman level certificate of fitness exam with the student-trainee designated worker and associated 10-1 ratio will certainly eliminate the very desirable reciprocal provisions between Alaskan workers and our northwest partners of Washington and Oregon in the electrical industry, something the DOL should desperately try and preserve.

The electrical inside wireman and outside lineman certificate of fitness designations are highly skilled occupations requiring a high degree of technical training and education and work in very complex work environments. The requirements have been established through a very deliberate process of over forty years input, trial and error, and amendment by dedicated industry representatives, and administrations of both political parties-and the industry and Alaskan residents deserve much better than the changes that have been proposed here and I respectfully object and speak against their adoption.

Respectfully,

Gary Brooks

From: [Gary Griffith](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New proposed rules regarding fitness cards
Date: Monday, January 13, 2020 2:25:47 PM

To whom it may concern.

I would like to express my concern for the new proposed regulations involving the state fitness cards. I believe we are taking a step back in the industries affected by this new change by allowing un trained people to be able to apply for a state fitness card without the proper training and safe work practices associated with the labor apprenticeship programs in place. All labor forces need competent and safe employees to provide the employers with the best possible work available. I strongly disagree with the new proposed changes. It seems to short cut the safety practices that get passed on under the direct supervision of skilled trained journeyman.

Thank you for your time,

Gary R Griffith card # A133435

Sent from my iPhone

From: [GCI](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Title 8 of AAC.90
Date: Monday, January 13, 2020 10:38:56 AM

January 13, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Seth Thomas. I am an Alaskan pipe trades craftsman. I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Your decisions on this topic will change people's lives. Removing licensing requirements in the electrical field will lead to worker fatalities, as will dilution of the ratio of qualified to unqualified workers in a workspace. I implore you to help myself and my fellow craft workers of this state protect the lives and health of apprentices.

Sincerely,
Seth Thomas
2405 Edsson Avenue
North Pole, AK 99705

From: [George Bennett](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship comment
Date: Friday, January 10, 2020 9:48:16 AM

I oppose the proposed change to apprenticeship standards. Construction is an inherently dangerous career and certified apprenticeship programs such as those operated by building trade unions are essential to workplace safety.

George Bennett
[602 Keeling Rd](#)
[North Pole, AK](#)
99705

Sent from my iPhone

From: [George McG](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to apprenticeship
Date: Friday, January 3, 2020 11:25:25 AM

To whom it may concern,

I am writing to express my my disapproval of the proposed changes to apprenticeship. I am a Journeyman Wireman and I had the incredible good fortune to successfully and safely complete my training here in Alaska.

The new rules which will allow as many as 10 apprentices to 1 journeyman are incredibly frightening. During my apprenticeship I worked beside a journeyman at all times for over 4 years and more than 7,000 hours. Even with this ideal scenario, I was shocked on more than one occasion. I made mistakes that could have been incredibly destructive to life and property had I not been so closely supervised. As a journeyman, my most satisfying days are those when I can work with, train, and mentor apprentices. If I had more than one to work with (let alone 10!), I would become a babysitter, not a teacher. The work would suffer, the production would suffer, and the safety of everyone involved would suffer. Obviously, apprentices are cheaper than journeymen. As a result, jobs will be bid cheaper, which would cause an increased push to do things quickly. Combine the two: higher emphasis on speed and a bigger, less experienced workforce. The end result has the potential to be catastrophic.

Additionally, it seems as though these regulations will allow for an unregistered person --that is to say someone who is not in a registered apprenticeship-- to obtain a trainee certificate of fitness. Whether you think so or not, this will result in misclassification of workers. Unprincipled employers will abuse this loophole to legally hire "independent contractors" who would actually be working legally in the electrical industry here in our wonderful state. It only takes a little imagination to see that this will cause an influx of out of state workers who are not able to cut it in an apprenticeship down south to come here and man work. There is such a boom nationwide, in almost every state but ours, that only those who are truly not ready or who are incapable of meeting even the lowest standards will come here. Otherwise they would stay home and fill the void of an estimated shortage of 200,000 skilled trade workers elsewhere. We will suffer. None of their money will stay here, and it is my understanding that an arrangement like this could last as long as 10 years before they would become eligible for journeyman status without any structured course work.

I'm not exactly sure where the impetus for this change is coming from, but I implore you to please think it through a little better. If it is an attempt at union busting, keep in mind that 80% of the state market share is non union and all journeymen to this point have completed an apprenticeship.

Skilled labor isn't cheap, and cheap labor isn't skilled.

I hope that you have the chance to think about some of the points I have made in this email. What I would like to know most of all is why this change was deemed to be necessary. Was there any input from a single tradesman or tradeswoman? Usually when things like this are proposed I like to follow the money but I can't imagine someone or some organization having the resources to spend that would convince the DOL to endanger it's state's people the way that this could.

Thank you for your time, and I'll be praying for sound judgement to prevail.

Sincerely,
George McGuan
Journeyman Wireman
837 W 56th Ave
Anchorage, AK 99518

From: [George Radulescu](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 5:44:48 PM

From: [Gilbert Burnet](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 8:07:04 PM

To whom it may concern,
I find the proposed regulations regarding apprenticeships appalling. The lack of oversight and training of the apprentices that this regulation affects will cause Alaska to become the least safest place to work. Putting someone in a job where life safety is a key component of that job and getting no training will ensure high injury and mortality rates. I'm afraid of a future where the so called qualified person who comes to hook up my new sink hooks it to the boiler instead of the potable water. Or go forbid they come to work on my electrical system and do something that burns my house down.

These regulations are bad for Alaska. I hope you see that.

Gilbert Burnet

"The bitterness of poor quality stings long after the sweetness of low price is forgotten"
-Aldo Gucci 1938

From: [Ginny Redmond](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:43:13 PM

To whom it may concern,

I am writing to express my concern about and opposition to changes in apprenticeship requirements for skilled trades in Alaska. Apprenticeships not only ensure that workers have a standard foundation of knowledge in their trade, they ensure the safety of all workers by promoting industry best practices and safety of the general public who may come into contact with tradespeople or their work. This deregulation weakens the Alaska economy by exposing its residents to unnecessary safety hazards causing lost wages and poor quality craftsmanship. This also weakens the economy by devaluing the invaluable skills our trained residents bring to the workforce resulting in lower wages and less participation in the economy. Our Alaska residents and their families deserve better. Please uphold current apprenticeship regulations in skilled trades.

Sincerely,

Virginia Redmond
Sent from my iPhone

From: gr8_49th@me.com
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Job killing/anti-apprenticeship regulations
Date: Monday, January 6, 2020 10:42:41 AM

Dear Commissioner Ledbetter,

I am writing to oppose DOL's proposed anti-apprenticeship regulations. Eliminating apprenticeship standards, and allowing journeyworker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death. These regulations undercut our longstanding, privately-funded training programs supported by contractors and construction workers. Your proposed regulations would also reduce career opportunities for transitioning service members. Please withdraw these proposed regulations.

Thank you for your work to defend apprenticeship, our jobs, workplace safety, and job opportunities for our veterans.

Sincerely,

James Dahl

Sent from my iPhone

From: [Grace Kubitz](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: FW: Letter on Proposed Regulation Changes
Date: Monday, January 13, 2020 12:24:09 PM

From: [Greg B](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: proposed new regulations
Date: Monday, January 13, 2020 2:43:30 PM

To whom it may concern:

I'm writing to express my opposition to the new regulations proposed by the Alaska Department of Labor. As a licensed journeyman electrician, and as someone who benefited from an accredited apprenticeship program, I firmly believe that to enact these regulations will be dangerous for everyone, from the workers who install electrical and plumbing systems to the ordinary citizens who end up using those systems. Just accumulating 12,000 hours on a job site does not, and should not, qualify someone to receive a license to perform that work as a trained professional. There is so much more information and training that goes into preparing someone to do these jobs. Additionally, the "student trainee" nonsense that allows 10 trainees to be "supervised" by one journeyman is a joke. A really bad joke. And again, a dangerous joke. I implore you to reconsider implementing these regulations, and do some consulting with actual professionals in these industries before attempting to make changes that will jeopardize the safety and well-being of so many Alaskans.

Thank you,
Greg Bierma

From: [Greg Zadina](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Changes to 8 AAC
Date: Friday, January 10, 2020 8:37:00 AM
Attachments: [image002.png](#)

Good morning Becky,

I'm hoping you can help me find the proposed changes to the uniform plumbing and electrician apprenticeship codes. I've been searching online and have easily found the list of codes to be amended, however I can't seem to find the actual detailed changes being proposed to those codes. Would you be able to send me a link or perhaps a copy of the proposed changes?

Thank you for your time.

Regards,

Greg Zadina

Employment, Training and Support Services (ETSS) Manager

D: (907) 486-9820 | F: (907) 486-4829 | greg.zadina@kodiakhealthcare.org

Kodiak Area Native Association | 3449 Rezanof Drive East | Kodiak, Alaska 99615

www.kodiakhealthcare.org  

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From: [Gregory Fast](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: proposed changes to Title 8
Date: Thursday, December 12, 2019 3:59:48 PM

Dear Sirs:

I am writing to tell you of my extreme displeasure with the proposed changes to Title 8.

I believe it is a disservice at best to the workers to eliminate the "apprenticeship" requirement and replace it with an undefined "trainee" standard. I served an apprenticeship and became an electrical worker. The apprentice model is highly successful. It needs to be a documented program as it is now. The ratio of apprentice to journeyman is crucial for the safety of the apprentice as well as their learning. Doubling the number of trainees who could be supervised by a journeyman is a recipe for disaster, putting profits before people. For occupations where a single error can result in death--not just for individual workers but others on a job site--these changes present a clear and present danger to the life and safety of Alaska workers, and must be discarded.

I urge you to not allow these changes to pass.

Thank you,

Gregory Fast

16813 Yellowstone Dr.

Eagle River AK 99577

AK. Certificate of Fitness #114499

From: [Hannah Wilson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changes to COF
Date: Wednesday, December 25, 2019 9:41:19 AM

To whom it may concern,

As a registered wireman apprentice through the IBEW the proposed changes to the certificate of fitness requirements are incredibly worrisome. Safety would become a major concern, having one journeyman assigned to ten "trainees" and allowing any person to walk in to the DOL, pay \$250 and be a "trainee". One person will become responsible for the health and safety of ten inexperienced people that could possibly be spread out at a work site in such a way it is impossible for the journeyman to have an eye on all of them at the same time. The training and experience these "trainees" would get would be sub-par compared to the current training and experience when going through an accredited program. Are these the people you potentially want building public buildings? Would you feel safe in a building knowing it was built by one journeyman and ten potentially completely inexperienced "trainees"? As I said before there is no possible way the journeyman would be able to watch what the trainees were doing the entire time, which means mistakes could easily be missed therefore inhibiting the integrity of the project.

These "trainees" would also potentially end up being nothing but cheap labor for companies to abuse. The trainees could potentially fulfill the required 12,000 hours having done nothing more than material handling or an accumulation of low level grunt work, while learning next to nothing with regard to becoming a legitimate electrician.

Accidents would be more and more common on the job site, work comps would increase, insurance rates would increase, it would cause a domino effect which in the long run could hurt those contractors that choose to take part in this proposed change. Which theoretically would make those contractors over time not want to risk having to pay out more for insurance claims and therefore turn back to only accepting legitimate apprentices from accredited programs.

Ultimately proposing this change is an insult to the unions and even non-union apprenticeship programs. If the DOL goes through with this change it shows they ultimately do not care about the well being of this states residents nor about the future infrastructure.

Sincerely,
Hannah Wilson, Apprentice Wireman

From: [High Voltage B](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulations.
Date: Friday, January 10, 2020 2:02:11 PM

Dear Sir or Ma'am,

I'm concerned and do not agree with proposed labor changes. The skilled trades are very dangerous to perform and when not maintained or installed correctly pose a threat to public safety. I've worked in the USAF as an electrician, nonunion electrician, and as a union trained lineman. I would not be knowledgeable or possibly alive if I did not do these jobs with an apprenticeship setting. I know from experience that the idea of a 10 trainee to 1 journeyman is foolish and dangerous one. There needs to be direct supervision over an apprentice. The state fitness card to me maintains a qualified state workforce in Alaska kind of like a commercial drivers license does federally. I also find places such as Avtech violating federal wage and hour by not paying a trainee as proposed. I find the SOA violating bid process with the potential backing of SOA resources against other contractors. I recommend the new regulations be omitted all together.

Brad Baldrige
Alaska Voter

From: [Hiram Pendergrass](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Proposed changes to Certificate of Fitness
Date: Friday, January 10, 2020 8:03:56 AM

To whom it may concern:

I am a licensed journeyman electrician in Alaska, and also completed a 5 year registered apprenticeship program here. I have serious concerns about the proposed changes to the Certificate of Fitness. For one, allowing 10 student trainees to 1 journeyman is very dangerous. During my apprenticeship, I had the experience of working one on one with journeymen. And fortunately for me, there was always someone watching over me to make sure I didn't put myself in a dangerous situation. With a 1 to 1 ratio, that is doable. At a 10 to 1 ratio, there is not enough space in most facilities to have that many people working in the same area, to ensure that all the trainees have direct supervision. The likelihood that inexperienced trainees will put themselves in harm's way is high. Construction is dangerous no matter how much experience one has, but especially so for beginners. In my opinion, using a 10 to 1 ratio is just asking for trouble.

Additionally, the idea of allowing people to bypass the requirement of being in an apprenticeship program is frightening: "the applicant has a minimum of 12,000 hours of legally obtained work experience in work subject to standards of the National Electrical Code."

My classroom time as an apprentice was instrumental in learning about the dangers of electricity, and construction hazards in general. I know for certain I was able to minimize and avoid dangers because of information and knowledge gained in the classroom. Moreover, I learned how to use and apply the National Electrical Code in order to install safe electrical systems. That learning also happened in the classroom. On the job site, there is not enough spare time to teach apprentices everything they need to know. The schooling piece is a critical component of apprenticeship.

I understand the idea of wanting to create more work opportunities, especially for skilled labor positions. I applaud the effort to do that. However, I believe these proposed requirements are not only dangerous, but a disservice to the future trainees, who will be unaware of the hazards around them, and not have a thorough understanding of how to install safe electrical systems. I hope you will reconsider these proposals.

Thank you for your time.

Sincerely,

Hiram Pendergrass

or by notarized statements on letterhead stationery from employers, that the applicant has a minimum of 12,000 hours of legally obtained work experience in work subject

the student trainee will be working under the direct supervision of a journeyman certificate of fitness holder, qualified to perform the work being supervised, while performing work subject to the code;

(B) the program will adhere to the journeyman supervision ratio described in this section; and

(C) the program agrees to have all work performed by student trainees inspected by the authority having jurisdiction as required by state law or local ordinance.

(3) pays the applicable fees under AS 18.62.030, unless such fees are waived by the commissioner.

(c) The ratio of individuals working under student trainee certificates on a job site may not be more than ten student trainees for every certified journeyman, subject to the type of code work performed.

From: [Ian](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Public Safety is at Stake!
Date: Saturday, January 11, 2020 6:26:15 PM

Increasing the apprentice ratio to 10:1 is a dangerous proposition that will affect the public. It will also put all current trade workers at risk. Having 10 apprentices to one journeyman is a recipe for disaster. Go to any apprenticeship training center and see for yourself how difficult it is to teach and explain skilled labor practices to even just 8 people off the street in a controlled and relaxed environment. Now imagine an environment that is loud, cold, dark and raining, how will directing 10 brand new apprentices work for you than? This is going to drive up injuries and accidents in the workforce guaranteed! Please do some investigating on this proposal and think about the ramifications it will have on our states residents, workers and families. I am journeyman lineman for the 1547, i do not want to see any of my co-workers put in harms way due to this change. Thank you for your time and please consider what I have written here. It is the truth.

Ian Wiedmaier
wiedmaierian@hotmail.com

From: [Ian Olesen](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Alaska Safe
Date: Friday, January 10, 2020 10:31:43 AM

To whom it may concern.

I am Ian Olesen a journeyman lineman since 2008 and am opposed to new proposals for license elimination. Current licensing keeps skilled labor and the public safe. These occupations can be very dangerous and should maintain a high level of training and licensing. I am opposed to the new proposed changes.
Ian

From: [Isaac Nah](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 5:24:09 PM

To whom it may concern,

I do not agree with these proposed regulations to untrained and unskilled workers that have not gone through the proper training and courses to become skilled and licensed workers in the trades. I am currently in the local 367 union and going through the apprenticeship program. I know having a 10:1 lamen to journeyman, would lead to having mistakes on the jobsite and the proposed regulations can put millions of lives at risk because of the lack knowledge and experiece to build and maintain the infrastructure for the present and the future of us alaskans.

Thanks your time,
Brother Na of the local 367

From: [Jackie Endsley](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Changes to Title 8
Date: Friday, January 10, 2020 6:38:52 PM

I am opposed to the proposed changes to Title 8. There is nothing safe about 10 apprentices to one journeyman. This goes against commonsense with such dangerous professions. I worked for Matanuska Electric Association from 1981-1996 and learned quite a bit about electricity and it is dangerous. Period.

I believe all the changes will endanger the people who work in these professions.

Again - I am opposed to any changes to Title 8.

Sincerely,
Jackie Endsley
18028 Sanctuary Dr
Eagle River, AK 99577
907-529-4501

From: [jacob.collins](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship training and standards
Date: Monday, January 13, 2020 11:22:54 AM

From: [Jaime Zellhuber](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 1:34:31 PM

To all concerned,

The proposed changes to State regulations governing the requirements of registration of plumbing and electrical apprentices in an accredited program and allowing a 10 to 1 apprentice to journeyman ratio is a poor idea and a risk to the public.

I have worked as a plumber in Alaska for more than 20 years and have worked with and trained several apprentices in that time. There is no way that a single journeyman can properly supervise the work of and train 10 apprentices while working on a job. An apprenticeship is not like a classroom. The apprentice learns by working side by side with his/her journeyman and receiving instruction as needed. I would favor a one to one ratio. To expect a journeyman to supervise the work of more than one or two apprentices while doing his own work is to invite mistakes that propose significant risk to the public. This lowering of standards is an unacceptable risk.

It is also of concern that the State is looking to get rid of the requirement that an apprentice be registered in an approved apprenticeship program. These programs insure that an apprentice receive training in a variety of areas. To take away this requirement opens the door to apprentices not receiving a well rounded training during the course of there apprenticeship.

Thank you for your time and I hope the Department will reconsider these proposed changes.

Sincerely,

Aldon Zellhuber

From: [Jake Elliott](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship Regulation Changes
Date: Monday, January 13, 2020 3:00:55 PM

Dear Alaska DOL,

I am writing in regards to the proposed changes that if passed, will affect our working qualifications and standards. I am strongly opposed to all of these changes. They will negatively affect quality of the work produced, along with the quality and skill level of the workers. Electrical installations are not something that can be short-changed with unqualified labor. Short cuts and money savings tactics will result in poor installations that are not professional, not made to last, and are more than likely dangerous. The electrical code and licensing requirements exists for a reason and it would be a great mistake to jeopardize these standards with an unqualified work force. I read through the proposed changes and having 1 Journeyman responsible for 10 Apprentices makes absolutely no sense, it would eliminate on the job training and performance. Not to mention there would be a huge increase in the chance of apprentices getting hurt on the job. I'm a 5th year wireman apprentice and the only reason I have the skills and knowledge that I do today is because of the qualified Journeyman level workers that have taught me along the way. The Apprenticeship standards that are currently in place today work, and they need to remain the same.

Sincerely,
Jake Elliott
IBEW 1547 Wireman Apprentice
5418 Anderson Road
Fairbanks, AK 99709

From: [Jake Meyer](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 10:28:07 PM

From: [james cummings](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Alaska
Date: Friday, January 10, 2020 3:54:15 PM

To whom it may concern:

- I am writing to express my staunch opposition to the proposed regulations changes affecting the plumbing and electrical skilled trades...

My names is James Cummings and I have lived in the state of Alaska for nearly 40 years. I have also been a member of the IBEW for near 20 years as a Power Lineman.

I see no good coming from these proposed changes that the Department of Labor would like to see go into effect. Why would one try to flood a market with unskilled labor in a trade that is one of the most dangerous in the world? It doesn't make any sense. Is there some benefit that I am not seeing here? All through my apprenticeship as well as my years as a Journey Man the industry has always tried to make my trade more safe to the workers and the public as well as provide skilled labor to businesses that need a specific skill set. I know that Alaska is one of a few if not the only state that does require and fitness card to perform line work is that a bad thing if so how? I have worked all over the United states as a Journeyman Lineman and from that experience one of the things that I have noticed is that actually going through and apprenticeship and having to perform and pass tests has made me a better asset to the companies I work for. Your trying to make a trade that is already one of the most dangerous into one that is even more dangerous. If you are short on cops are you going to just grab Joe blow at the local coffee cart and send him on a drug bust with the real police officers and put their lives at risk along with the lives of the public.

Doing away with the state testing to be able to do line work up here also opens the doors for more individuals from out of state to come in here and take Alaskans work. Most of us live in this state full time I don't come here and make money then go spend it some were else. Do you think these changes are going to help Alaskans financially in some way? If so please explain. There is a reason that these trades require special skills and an apprenticeship that you must complete in order to perform the work. I hope you rethink these proposed changes and do the right thing for Alaskans.

Thank you
James Cummings

From: [JAMES YUILL](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 1:30:32 PM

From: [Jamison Johnson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: proposed regulation changes to skilled tradesman training
Date: Friday, January 10, 2020 9:04:41 AM

Hello,

My name is Jamison Johnson and I am an electrician in Fairbanks with 21 years of experience. The proposed changes that some “law makers” are trying to push through to weaken or eliminate legitimate apprenticeship programs is one of the worst ideas that anyone has come up with in the labor industry’s history of our great state. This would cause unqualified workers to be exposed to dangerous situations that they would not be prepared or trained for, as well as putting the lives of co-workers at risk. The electrical (as well as plumbing) industry is extremely dangerous, and any “law maker” that doesn’t value MY life and safety shall never get a vote from myself or my family ever again.

That being said, votes should NOT be the reason for stopping this madness... The lives and safety of the workers should be the first priority. In my opinion if these changes were to happen and there was an increase in accidents and deaths as a result, the politicians who pushed for such dangerous industry changes should be tried for manslaughter and let a jury of working class Alaskans decide their fate. Thank you

From: [Janell Grenier](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 11:57:33 AM

From: [Jannarae Sipes](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation changes
Date: Sunday, January 12, 2020 4:14:06 PM

January 12, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Jannarae Sipes and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Jannarae Sipes

Sent from my iPhone

From: [Jannean Newbury](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Keep Alaska Safe
Date: Monday, January 13, 2020 3:49:55 PM

Sir/Ma'am,

I am writing to voice my deepest concern and disapproval for the proposed apprenticeship changes. One of my concerns is the proposed 10:1 apprenticeship to journeyman ratio. As a prior military technical training instructor, I have accumulated over 4,000 hours training unskilled, brand new soldiers that had zero knowledge of basic hand tools or working in hazardous work zones. The maximum class size is 4:1 student to instructor ratio, which this allowed for close group instruction and interaction, but when it came to actual hands on training, I could only monitor and observe 1 student at a time. This allowed me to pay close attention to the student to ensure they were working safely and I could give them additional instruction as they went through the tasks/objectives. The military is training their own soldiers with zero skilled trade knowledge to work on multi-million dollar aircraft and once trained these soldiers are working on these aircraft and keeping them airworthy and bringing soldiers home from war. This would not be possible if the student to instructor ratio was unrealistic. If you allow a higher apprentice to journeyman ratio, this will create a very hazardous and unsafe work zone because the journeyman would not be able to closely watch and supervise untrained apprentices. With unskilled/untrained apprentices in the work zone, their work will go unchecked and could lead to poorly installed electric wiring or contaminated plumbing systems, which is a hazard to themselves, the other workers on the worksite and the general public.

Thank you for your time,
Ryan Newbury

From: [Jasen Johansen](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 1:29:28 PM

Hello,

I am an apprentice in the IBEW and I feel this proposed labor regulation will make my workplace unsafe. Please value my safety and my life and don't pass it. Thank you.

Jasen Johansen
(907) 242-7472

From: [Jason Ebberson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Proposed Certificate of Fitness regulations
Date: Monday, January 6, 2020 9:29:36 AM

To whom it may concern:

Greetings, my name is Jason Ebberson and I'm a Journeyman Lineman in Seward, AK. I've been in the line trade since 1999 and am a member of the IBEW for 20 years. I am writing today in opposition to the proposed changes to MIPL 146 and 161. The Certificate of Fitness is a much needed asset to the State of Alaska. It keeps unqualified workers from obtaining highly qualified and dangerous positions in Alaska. I really wish every state had this degree of testing. It keeps high marks in safety for all workers. Most employers use some kind of testing whether it's a written exam and a physical exam to prove competency. Keeping the COF is necessary to save lives. This isn't a game. There is no room for error in the electrical industry and by eliminating the COF opens a door for catastrophic failure. If something is working smoothly, what's the purpose of trying to manipulate it into something that will cause harm to the industry and working individuals families. You don't need blood on your hands. Changing this will allow anyone to come here and perform extremely dangerous work. I know you don't want one teacher teaching 40 kids in a classroom. Your child won't receive the necessary attention to succeed and will fall behind. This works the same way, but with high voltage. If an apprentice isn't getting the attention they need then they could make a mistake and die. We don't get chances. We cannot make mistakes. If we do, we die!! This isn't a game. Please use common sense here and leave the program the way it is. I'm speaking to you as an educated professional with thousands of hours in the trade. Do the right thing.

Thanks for listening,
Jason P Ebberson
PO BOX 1432
Seward, AK 99664
509-989-2089

Sent from my iPhone

From: jccarlson@gci.net
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New regulations
Date: Friday, January 10, 2020 10:21:42 AM

From: [Jeannie English](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: PUBLIC COMMENT - DOL Section 8 Proposed Changes
Date: Sunday, January 12, 2020 10:47:08 PM

To: DOL Commissioner's Office

Dol.lss.regulations@alaska.gov

Re: DOL - Workforce & Development Sec. 8 Proposed Changes

January 12, 2020

Alaska Dept. of Labor,

I am a resident of Alaska since the 1960's. My life's work has been predominantly in the fields of telecommunications and home construction. As a young Alaskan adult I received training in an 8000 hour telecommunications apprenticeship which gave me in-depth training from which I benefitted for years to come.

According to my understanding of your proposal, you desire to make a "ratio" of one journeymen to every 10 apprentices at job sites. Without question this would greatly compromise the apprenticeship training experience.

Over my time working in construction, including the Alaska Pipeline construction, I was blessed to have learned from and worked with skilled, knowledgeable and safety conscious individuals. In the early years of my work their sharing of knowledge was the key part of my performance, but their presence on the job as my instructor and advisor was the most important aspect of my journeyman/apprentice partnership experience. Your proposal to greatly dilute the ratio of journeymen to apprentices would eliminate an apprentice's proximity and access to a journeyman.

It is my opinion that such regulatory changes will not only lower the quality of trades in Alaska, but could eventually lead to more Alaskan projects that are riddled with sub-standard outcomes and that could have hazardous repercussions.

Before you act, please consider all the potential fall-out from cutting corners in the trades training programs.

Sincerely,
Jeannie English
PO BOX 10915
Fairbanks , AK 99710

Sent from Yahoo Mail for iPad

From: [Jed Cress](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Wednesday, January 8, 2020 12:42:04 PM

From: [Jeff Leete](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: AAC Plumbing and Electrical proposed changes
Date: Friday, January 10, 2020 11:08:57 AM

My name is Jeffry Leete. I am a licensed Journeyman Lineman from here in Soldotna. I indentured in the IBEW Apprenticeship in Anchorage in 2002, and obtained Journeyman certification in 2007. I am opposed to the Dept.of Labor's proposed changes to the licensing requirements for Plumbers and Electrical workers (8 AAC 90.130, pg.15 through 8 AAC 90.165, pg. 24). This includes the changes that allow for 12000 hours of "experience" in lieu of a formal apprenticeship program. After having been through a formal apprenticeship, and having friends who have gone through established training programs (such as the Associated Builders and Contractors), allowing anyone who has done anything relative to an industry to test out, or be eligible for a certificate of fitness is a mistake. Formal apprenticeships and training programs exist to ensure safety and quality in craftsmanship and product.

Dropping the requirement of testing for a Journeyman (Power) Lineman is a mistake (8 AAC 90.162(b),pg.21). The test requires workers to prove basic knowledge and safety regulations vital to the construction and maintenance of overhead and underground power lines. Without the test, and now without proof of formal education or training program, workers will be able to "buy" a certificate of fitness. It will allow untested, unproven workers to fill jobs in a dangerous industry with a phony license. Employers will not know if they are getting quality workers or ones who bought their certification. These imposters will eventually lower wages due to them providing "competition" for jobs. The lack of training will eventually show itself with an increase in industry incident and accident.

I am also opposed to the new "Student trainee certificate of fitness" including its allowance for a 10 to 1 student to journeyman ratio (8 AAC 90.300, pg 24). I understand that different trades and types of work allow for different ratios. However, I've read that the new changes have increased apprentice or student ratio above the previous ratios. The previous regulations are more on par with industry standards, and are in place to provide assurances that trainee work is directly overseen by licensed, qualified journeymen. The thought that in certain circumstances, 1 journeyman can oversee safe and quality work by 10 trainees is not realistic. It's foolish to think 10 newly certified student trainees wiring a commercial building, plumbing a fire suppression system, or building a distribution powerline while 1 journeyman (potentially with no quality training) guarantees safe and quality work.

The current AAC regulations work. As an industry professional and concerned Alaskan: "If it isn't broke, don't try to fix it."

From: [Jeffrey Hedges](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 2:40:15 PM

To whom it may concern,

Removing training requirements and increasing the 1 to 1 Journeyman to Apprentice standard to 1 Journeyman to 10 Student Trainees is ludicrous. The only thing this would serve to do is ensure an increase of accidents, injury, death, and damage to property and equipment. Do not make these proposed changes to Title 8 of the Alaska Administrative Code.

Thanks,

Jeff Hedges | Building Inspector III

[Community Development Department](#) | City & Borough of Juneau, AK

Location: 230 S. Franklin Street, 4th Floor Marine View Building

Mailing: 155 S. Seward Street, Juneau, AK, 99801

Office: 907.586.0768 | Cell: 907.321.4361



Fostering excellence in development for this generation and the next.

From: [Jen Eng](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Re: PUBLIC COMMENT / PROPOSED: DOL WORKFORCE & DEVELOPMENT CHANGES
Date: Sunday, January 12, 2020 9:15:47 PM

Public Comment - Regulatory Changes to Section 8 JANUARY 12, 2020

To: Department of Labor Commissioner
Dol.lss.regulations@alaska.gov

Re: PUBLIC COMMENT
DOL - Workforce & Development
Proposed Regulatory Changes (Dec. 4, 2019)

Alaska Dept. of Labor,

I am a concerned electrical journeyman lineman, with over 40 years experience, writing in response to recent proposed regulatory changes to LABOR AND WORKFORCE SECTION 8 AAC 63.010 dated December 4, 2019. I began working as an apprentice in 1956, and I worked up through the 2000's. There were several of my fellow linemen who lost their lives on the job, and I'm aware of several apprentices in Alaska who suffered severe injuries.

Over the last century the electrical industry has made great advances in the area of worker safety as well as improved electrical standards and codes. However, the hazards of the work have not changed, the work is still deadly. Our greatest achievement from a worker's perspective has been improved safety and apprenticeship training.

I believe the proposed Section 8 Labor & Workforce Development regulatory changes definitely would impact our most vulnerable, the apprentices. The proposal to replace the current 1:1 apprentice to journeymen ratios with a 10:1 ratio is definitely a recipe for disaster! It would without question lead to higher accidents and even deaths.

Proposed regulatory changes reducing "on-the-job apprentice to journeymen ratios", and changes to "journeymen certification methods" seem purely profit driven with little regard for life or limb. In my opinion such reductions in training and certification standards would take us on a backwards path to such a time when the unregulated work place had many grave injuries and deaths.

Speaking from years of experience in a dangerous and demanding work - please don't repeat the mistakes of earlier decades.

Sincerely,

Jay T Lawless
880 Seldom Seen Rd
Fairbanks , AK 99712

[Sent from Yahoo Mail for iPad](#)

From: [Jeremiah Marchwick](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 1:01:43 PM

From: [Jeri Thompson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation changes to Title 8
Date: Saturday, January 11, 2020 12:42:07 PM

Commissioner Ledbetter:

The idea of changing the current regulations of Title 8 is ill conceived, dangerous and economically bad. It is a fix for something that isn't broken.

The thought of not having any kind of control of the standards for apprentices is almost criminal! If you went to a doctor for brain surgery, would you want someone with shaky credentials doing the work or would you want the best trained professional doing the job? I'll leave that to you.

The present apprenticeship standards are a tried and true method of providing a workforce of properly trained people who have the skills necessary to do the best job possible in the safest manner possible.

Any dilution of this process will surely result in an increase in accidents, workman's comp claims, wrongful death investigations and the lawsuits that will inevitably follow.

This just a bad idea and will cost the state millions in damage claims, loss of decent paying jobs for working people and lost opportunities.

Sincerely,

Jeri Thompson

Sent from [Mail](#) for Windows 10

From: [Jeri Thompson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Friday, December 13, 2019 11:01:16 PM

From: [jesse kolbeck](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 5:10:40 PM

From: [Jessica Boyden](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 7:07:13 AM

I would like to voice my concern as to how unsafe this is. As a wife and daughter to a journeyman lineman and a wireman in the IBEW, I appreciate all the work that have done to get where they are at. By going through the apprenticeship program you are placed in a 1-1 or 2-1 ratio making learning the key safety and skills needed for the trade essential. Without going through with this type apprenticeship program they would not have the knowledge and skill to be the safest they possibly can be on the job. My father-in-law has recently retired from the IBEW as a lineman after 44 years and believe it is because of the apprenticeship program he never had an on the job injury. My father who is an active journeyman wireman for 30+ years has also remained injury free. This change would cause much anxiety and distress knowing that untrained workers would be working along side my husband. He has went through the 8,000hr apprenticeship program just like his father and grandfather did; and along with my father.

As a registered nurse I would be livid to know that just anyone could become a nurse by working in the medical field for 6 years. Think of how you would feel to be that patient? Would you rather have a skilled nurse whose been through the schooling or someone whose just worked in the field for 6 years? Would you trust them with your IV start?

Changing this regulation it would drastically hurt our skilled trade work force.

Jessica Waldrop

From: [Jessica Ryan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Gene Bay](#); [Bradley Austin](#)
Subject: AKDOL Proposed Regulations Public Comment
Date: Monday, January 13, 2020 1:16:30 PM
Attachments: [DOL_Reg_Change.pdf](#)

Please see the public comment attached.

Thank you,

Jessica Ryan

Office Manager/Pension Administrator
Plumbers & Pipefitters Local Union 262
1751 Anka Street
Juneau, AK 99801
P (907)586-2874
F (907)463-5116

From: [Jim Hamilton](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Sunday, January 5, 2020 1:06:16 PM

My name is James B. Hamilton. I am a Journeyman Power Lineman and a member of IBEW (International Brotherhood of Electrical Workers) Union, Local 1547. I have been in the trade for 52 years. The apprenticeship training, through IBEW, is very essential to becoming a highly qualified journeyman lineman. To this day, I still get training from the apprenticeship school for updates and safety certificates, that we need to work safely and do our job in a professional manner. The public respect us for the training we have and the safe professional jobs that we do. This is all due to the hard work of our apprenticeship trainings and the professionals that it has created. Governor Dunleavy and his cohorts, that want to change laws in our apprenticeship training in the state of Alaska, need to back off. Union apprenticeships have a much higher standard of training then the non-union apprenticeships. When you graduate from a union apprenticeship, you are considered to be an elite journeyman in your field, whether it is a power lineman, an inside wireman or a telecommunications journeyman.

Sincerely,
James B. Hamilton
Sent from my iPad

From: [Jim Raymond](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 8:53:59 AM

To whom it may concern,

Removing training for jobs that require skilled tradesmen and women is a very unwise decision. We have learned over time that the training reduces injuries and deaths. Those before us suffered and died when they were not properly trained. Families suffered as their financial stability earner was lost. Let's not repeat history. Require and keep the necessary training to keep our workers, and us, safe from unskilled and unsafe workers.

Jim Raymond.

Sent from my iPhone

From: [Jim Sampson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 2:08:59 PM

Dear Commissioner Ledbetter,

One of the main missions of the Alaska Department of Labor is to ensure the safety and health of Alaska workers.

While we have not formally met, I served as Alaska's Commissioner of Labor during the Cowper Administration from 1986 – 1990. I oppose the department's proposed regulation changes to electrical and plumbing licenses and the addition of a new section for a student trainee fitness license with a ten to one job site ratio. These changes will only increase the likelihood of serious injury to Alaska workers.

With kind regards, I am

Sincerely,

Jim Sampson

Sent from [Mail](#) for Windows 10

From: [JJ Waldrop](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 2:39:23 PM

Good afternoon

I am John Waldrop and I am a journeyman linemen of the Ibew local 1547, removing the apprenticeship from electrical and plumbing licenses would cause a lot of safety problems, no person should be able to have ten people working underthem, 10-1 doesn't work and guys would be lost and left behind on the work field, this would cause a hazardous work field and cause someone to get killed.

I did a 8000 hour apprenticeship and it was the best thing for me!! Learned a lot and was well trained 1-1 ratio from a journeymen !!! I am a journeymen for 6 years and still hasn't stop learning we need to keep the apprenticeship and hours that go along with it !!!!

This proposed regulation is absolutely a joke and not needed in Alaska!

John Waldrop
9074407267

From: [joanna demarsh](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: opposing dol apprenticeship standards
Date: Monday, January 13, 2020 3:02:13 PM

January 13, 2020

Dear Commissioner Ledbetter,

I am writing to oppose the changes to the plumbing and electrical regulations that change the ratio of apprentices to Journeyworkers. This is a very bad, life threatening risk that is being even considered. The electrical field is not a "train a monkey" job. Having one person overseeing up to ten lives when working on electrical is outrageous. You will be sending people to their graves for not allowing proper guidance and training to over see people most likely to have little to no known knowledge of how electricity even works. The ratio we have of 1:1 is proven to have lowered death rates and accidents. This ratio is vital to continue to turn out high levels of educated workers that not only have a great craftsmanship but low safety risk to themselves, co-workers, and/or residents who seek the trade skill needed. Changing this ratio is not the way to create more jobs in a safe and professional matter. One wrong move in the blink of an eye, and this ratio will leave families with void at their kitchen table, a parent that no longer will be there to raise their children, all because you think you're creating jobs. You will be killing people.

Our Registered Apprenticeship programs in the state of Alaska are among the highest skilled levels in all the United States. Your changes not only undercut and under mind what our trades stand for. You will be endangering so much. Not only life threatening but this will not create skilled labor in Alaska. This program is open to all and yes it is difficult, but there is a reason for it. Anyone can get in, but they have to want to better themselves to learn a skilled, dangerous, and life changing career.

I strongly request and urge you to eliminate this request for change.

JoAnna Schneider
5th year Apprentice
2216 Frida Way
Fairbanks, Ak

From: [joe peters](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 6, 2020 8:03:21 PM

From: [Joe Sipes](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation changes
Date: Sunday, January 12, 2020 11:37:34 AM

January 12, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Joseph Sipes and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Joseph Sipes

Sent from my iPhone

From: [Joe Thiede](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 13, 2020 1:06:22 PM

From: [Joe Wilson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 9:23:53 AM

To the person's that are proposing to cut out the apprentice programs.
My name is Joe Wilson I'm a 40 year union member and belong to LU 367 in Anchorage Ak cutting the apprentice programs for the plumbers, pipefitters and, and electrician is one of the worst ideas I have ever heard the training of our work force in a skilled trade is essential to the high standard of quality and workmanship that we proudly do in our trade. To think you can do other wise is a foolish thought on who ever came up with it and I can also assure you that when elections come I will not vote for the person's backing this bad and misinformed idea.
Joe Wilson

From: [Joel Ramert](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 10:16:09 AM

The most important and meaningful training and knowledge in apprenticeship programs is the one on one work with a journeyman. That can only occur with the individual attention given in these vital hours spent working with your mentor. Without this specific guidance industry injury and deaths will increase. Lives are not worth trading for a more unindividualized volume based program with ten apprentices to each mentor. The current requirements are a minimum and any changes that lessen those standards for licensing are a dangerous and detrimental move for apprentices, journeymen, and the public in general. Please do not approve these undermining changes to the current apprenticeship program or licensing protocol.

Sincerely, Joel Ramert

From: [John Jensen](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed apprenticeship changes
Date: Saturday, January 4, 2020 1:08:59 PM

From: [John Johnson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changing of journeyman licensing
Date: Tuesday, January 7, 2020 5:04:42 PM

I feel this will really harm our workforce. Bring down the knowledge and training as well as prolong the apprenticeship to the extent the good workers will seek other jobs with ample pay. With training down do to the ratio of 10 to one the trainees will be at a way higher risk of being hurt, doing their jobs improperly, and even possibly hurting the public and or public/others property. I went through a apprenticeship program here in Alaska and got my journeyman license 20 plus years ago, the system works I don't see a reason to try to fix a working system. Without using the packages from the apprenticeship program showing the apprentice learning various areas in their field there will be no way we know our workforce of the future has the knowledge or ability to keep our society running smoothly and safe like we do now.

Thank you

John Johnson

[Sent from Yahoo Mail on Android](#)

From: john plutt
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Bishop, Click \(LEG\)](#); senator.scott.kawasaki@akleg.gov; [Coghill, John \(LEG\)](#); [Weimer, Rebecca E \(DOL\)](#)
Subject: title 8 issues
Date: Wednesday, January 15, 2020 11:13:20 AM

Becky Weimer, see below comments regarding reduction of regulations.

Opposition to proposed changes to Title 8 of the Alaska Administrative code and:

AAC 90.130 Plumber certificate of fitness

AAC 90.300 Student trainee Cert of fitness

As an Alaskan resident, born & raised, and state of Alaska licensed Journeyman Plumber for over 39 years, **I strongly oppose the above mentioned administrative changes.**

Briefly, I have attained over 80,000 hours working as an apprentice, journeyman, foreman and superintendent on many jobs throughout the state including the North Slope. I completed a stringent apprenticeship training program with the UA Plumbers & Pipefitters Local 375 that included both classroom and on the job learning and can attest to the importance of structured apprenticeship. As a supervisor and journeyman, when my employer hires journeyman plumbers or registered apprentices they are assured that person is trained, engaged and committed to learn all aspects of the trade and work in a safe manner. These apprentices are part of a DOL Registered apprenticeship program that conforms to standards in the piping industry today.

In all my years working, the number one company priority on the job is safety for its workers. Without a standout safety record, employers face losing job contracts which results in lost job opportunities for qualified employees. With the ever importance of safety in the workplace, the proposed regulations create an unsafe environment for all involved. The ratio of apprentices to journeyman greater than 2:1 is unfair for the apprentice and journeyman as both are getting shortchanged... not able to receive proper guidance and

clearly creates and unsafe working atmosphere. A 10:1 trainee to journeyman ratio is flat out criminal.

In closing, the construction industry is hard physical work and these administrative changes put safety in the mirror for all workers at the same time when employers demand a stringent safety culture. **I reiterate my opposition to these administrative changes.**

John Plutt
2600 17th ave
Fairbanks, Alaska 99709

From: [john plutt](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Bishop, Click \(LEG\)](#); senator.scott.kawasaki@akleg.gov; [Coghill, John \(LEG\)](#); [Weimer, Rebecca E \(DOL\)](#)
Subject: title 8 issues
Date: Thursday, January 9, 2020 1:19:49 PM

Becky Weimer, see below comments regarding reduction of regulations.

Opposition to proposed changes to Title 8 of the Alaska Administrative code and:

AAC 90.130 Plumber certificate of fitness

AAC 90.300 Student trainee Cert of fitness

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In closing, the construction industry is hard physical work and these administrative changes put safety in the mirror for all workers at the same time when employers demand a stringent safety culture. **I reiterate my opposition to these administrative changes.**

John Plutt
2600 17th ave
Fairbanks, Alaska 99709

From: [Jon Stearns](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changes to Title 8 of the Alaska Administrative Code
Date: Thursday, January 9, 2020 12:07:13 PM

I wanted to go on the record as a professional in the construction field that I am against the changes to Title 8 in regards to eliminating apprenticeship standards for plumbing and electrical trades. Before becoming a city building inspector I was a contractor and having a untrained tradesman onsite at times was a liability and had adverse financial implications. It was extremely obvious how far along in the apprenticeship program a tradesman was by the increased proficiency of their work. Finding skilled labor in the trades is difficult and this change would eliminate one of the only avenues to get trained labor in the trades.

In regards to my job now as a building inspector I'm even more offended by the proposal to do away with apprentice programs. The standard of work that we as inspectors come across differs greatly and my real concern is if the only avenue for a foundation of training within the trades is eliminated then quality of work will plummet and the cost of projects will sky rocket. Not to mention seasoned journey men will lose work to people that are less skilled and inexperienced. My hope is this was something that someone just put out there and that common sense will prevail because apprenticeships within the trades is one of the most valuable assets to blue color workers.

Jon Stearns | Building Inspector II

[Community Development Department](#) | City & Borough of Juneau, AK

Location: 230 S. Franklin Street, 4th Floor Marine View Building

Mailing: 155 S. Seward Street, Juneau, AK, 99801

Office: 907.586.0498



Fostering excellence in development for this generation and the next.

From: [Jonathan Bagwill](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: opposing the proposed apprenticeship policy change
Date: Friday, January 10, 2020 9:33:31 PM

Hello Commissioner Ledbetter,

I respectfully submit this letter as an electrician who started in this trade in 2004. I started on the non union side of things and worked very hard to excel in my profession and become that best I could be. It took me 3 years and 1 day to complete the necessary hours and schooling through AVTEC and the ABC program for my Journey level license. Whether it is in the union (IBEW) or not, I oppose this idea of allowing our very high standards to become muddled with the State (Florida) who has about the lowest standard of quality and professionalism for this high demanding and life safety trade. I implore you to not only reconsider your current direction, but abandon it all together. I do not make this request for personal gain or because it could or will effect the monetary compensation of myself or others, I make this request as a concerned citizen of this great state who has to live and work and shop in the very buildings that these trainees will be building at the ratio of 10-1 to a skilled journey level electrician or plumber. Thank you so much for your time.

Jonathan M Bagwill
Fairbanks Alaska
Licensed Journeyman Electrician and
Foreman for a local Alaskan company.

From: Jordan Thies
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Wednesday, January 15, 2020 11:13:26 AM

From: [joseph smith](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fw: Help oppose these job-killing regulations.
Date: Thursday, January 2, 2020 12:45:08 PM

From: [Josh R. Parsons](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Harmful and unsafe regulations
Date: Saturday, January 11, 2020 8:33:13 PM

In light of the new proposals from the department of labor, I want to share my perspective and thoughts. I am a journeyman lineman of 14 years. I went through the apprenticeship program and have benefited immensely from it. I want to be clear of what my chief concern is. This is not about union or nonunion. This is about safety. Pure and simple. These proposals will have a devastating effect on safety and will put tremendous stress on qualified workers who will have to watch their own backs as well as those of the new employees who have not the slightest training due to no apprenticeship. This is not right. The reliability and productivity will decrease substantially. People who go into a trade start as an apprentice for a reason. People who go into the military start as a private for a reason. They do not skip basic training and jump straight to the front lines as a sergeant in charge of troops. I know this first hand as I served from 2000-2003 in the U.S. Army overseas. There must be order and training that only comes from starting at the bottom and working their way up through time and experience. I respectfully ask you do not get rid of or change the apprenticeship programs. Safety should be paramount and these proposals show me they are not. Thank you for taking the time to read this.

Respectfully,

Joshua R. Parsons

Joshua R. Parsons

From: [Julius Matthew](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Harmful regulations
Date: Friday, January 10, 2020 5:00:48 PM

As a citizen and journeyman power lineman voicing my opinion during this public comment period, I oppose the proposed changes to the licensing regulations. Jobs with apprentices who are properly trained by competent journeyman give the workforce skills needed to produce a quality product and to perform their job in a safe and respectful manner. Power linemen, Plumbers and Electricians are skilled tradesmen who safely perform their work in hazardous conditions everyday. These are the workers that drive our economy. Increasing the apprentice ratio from 1:1 to 1:10 will not only jeopardize workplace safety and lead to accidents and injuries, it will also jeopardize the quality of training, quality of work, workers livelihood.

Thank you,
Julius Matthew

From: [Justin Lane](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 10:50:19 PM

To whom it may concern,

I am a proud member of the UA Local 367 going on 6 years. I went through the 10,000 hr apprenticeship program and am very grateful for that opportunity. Even after the 10,000+ hours of on the job training and school work I still find that there is something new to learn. I couldn't imagine allowing someone to have no training be responsible for the safety and health of the people of Anchorage or even the state of Alaska. The new proposal makes it so that anyone can become a tradesman with zero training. Not only are you risking the lives of the customers you are also risking the lives of the people working. The work we do day in and day out, isn't always safe, but if it's done by a union hand we know it's been done safely and properly. After the massive earthquake we had last November of 2018 we saw that the damage to homes in Anchorage was much less than that of Wasilla and Palmer. The fact that Anchorage has stricter requirements for electrical and plumbing work is the only reason why that happened. The apprenticeship programs that are already in place make it safer for the employees whom are properly trained and have someone there to assist them if they have questions. As an apprentice I had one journeyman per 2 apprentices. If I ever needed anything, that person was there to help make sure things were done safely and properly. To increase the limit to 10 apprentices for one journeyman is ridiculous. If this passes and you have one journeyman covering up to 10 apprentices, injuries will happen. Not only to apprentices, but to the consumers paying for the work and other trades working around. Injuries cost money, which from everything in the news I've read is a hot topic for this city and state. Which if this passes, lawyers should and will find a way to say that the city or state is liable. I'm not sure what is to be gained by lessening the requirements of people whom keep this city and state warm, with electricity, running water and waste systems that actually work. But one can only assume a government official is getting some sort of kickback financially, otherwise that person wouldn't be okay with risking the lives of the people they are supposed to be representing. I am disgusted by our government that this measure is being discussed. There is a reason the population in Alaska keeps dropping. It's because they don't trust the government around them to keep them safe. It's measures like this that make it clear that the government would rather collect a bunch of licensing fees from untrained people to help build up their savings account as opposed to actually looking out for the well being of the people they are supposed to represent. So if plumbers and electricians shouldn't have to have any training to get a license, why can't we just allow Doctors to not need any training in Alaska. Think about all the money we could make as a state if we just allowed people to take one test and become a doctor up here. No school required. Sounds like a good plan. Thank you for your time.

Justin Lane

born and raised in Anchorage, AK for 38 + years

From: Juston Strike
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Wednesday, January 15, 2020 11:13:34 AM

From: [K Kittredge](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans
Date: Monday, January 13, 2020 9:10:34 AM

I **OPPOSE** changes to proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1.

Alaskan contractors and craftsmen have successfully provided a well-trained workforce in these occupations for decades. Apprenticeships help ensure that employees that are new to these trades are well educated and supervised during the early years of their careers.

All the systems and regulations linked to these trades are directly related to public health/safety, and we should never reduce the training required to become a journeyman.

Kim Kittredge
10150 E. Witez In.
Palmer, AK 99645

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From: [Keith Dunn](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: "Comments submitted in opposition to proposed changes by Alaska Department of Labor and Workforce Development, Division of Labor Standards and Safety to Title 8 of the Alaska administrative code
Date: Monday, January 13, 2020 1:36:48 PM

The words below were provided by Gary Brooks but I could not improve on the message so I have chosen to resend his words with my heart felt thanks for his effort and Hope that your administration will not continue down this dangerous path. It is simply put, a giant fall backwards for workers safety.

" The proposed changes regarding registered apprenticeship requirements in Alaska and adding the new student-trainee section have clearly been proposed by someone unfamiliar with apprenticeship in general or adverse to the nationally recognized and jointly created and administered labor/management programs unparalleled in delivering quality education to American workers for literally centuries.

To propose the utilization of 10 student-trainees to 1 journey level instructor on the job-site of the most hazardous environments of the construction industry can only be contrary to the safety of the jobsite worker (journeymen, apprentices and student-trainees) but the public as well and certainly not what the DOL should be supporting. While a 10-1 student/instructor ratio may very well work and be applicable to a classroom setting, to attempt to carry that ratio over onto a construction jobsite performing electrical work covered by the National Electrical Code would put Alaska in a category by itself and certainly alone with respect to nationally accepted norms with respect to apprentice/trainee ratios, a very unsafe and undesirable designation for worker, consumer, and the public.

Coupling the 12,000 hour alternative pathway to journeyman level certificate of fitness exam with the student-trainee designated worker and associated 10-1 ratio will certainly eliminate the very desirable reciprocal provisions between Alaskan workers and our northwest partners of Washington and Oregon in the electrical industry, something the DOL should desperately try and preserve.

The electrical inside wireman and outside lineman certificate of fitness designations are highly skilled occupations requiring a high degree of technical training and education and work in very complex work environments. The requirements have been established through a very deliberate process of over forty years input, trial and error, and amendment by dedicated industry representatives, and administrations of both political parties-and the industry and Alaskan residents deserve much better than the changes that have been proposed here and I respectfully object and speak against their adoption."

Respectfully,
Gary Brooks
Retired

The words Gary Brooks has written are eloquent, true and encompassed my beliefs accurately and I thank him for his efforts.

Respectfully,
Keith Dunn

Retired

From: [Ken Helem](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: PRObarga@ibew1547.org; [Ruaro, Randy \(LEG\)](#); [Doug Helem](#)
Subject: Re: Changes in Title 8 AK Admin. Code
Date: Monday, January 13, 2020 12:12:12 PM
Attachments: [Proposed Apprenticeship Changes.pdf](#)

From: [Ken Seagle](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: comments on proposed changes to trainees and certificate of fitness
Date: Thursday, January 9, 2020 9:58:04 PM

To Whom It May Concern:

I am writing you as a Power Lineman that has worked in the state of Alaska since 1999. I under went the Alaska IBEW apprenticeship program, becoming a journeyman lineman in the year 2003.

I am writing you regarding the proposed changes to Alaska labor laws and regulations regarding trainees and ratios of trainees to journeyman.

As I understand the changes being proposed would, among other things, reduce trainee ratios to as low as 10 trainees to one journeyman. Also potentially do away with certificate of fitness requirements for power linemen, and electricians. As I am a power lineman, I will speak only to the effects regarding my trade. First off, trainee ratios. This in my mind is probably the most dangerous proposed change. Can you imagine if a change like this was implemented with our fire departments, police departments, even Airlines? Can you imagine having a fire department crew show up at your burning house with your child trapped inside, and knowing that only one of the men showing up was a professionally licensed and trained fireman, With the other 6 to 10 members of his crew being trainees? Can you imagine having somebody committing an invasion of your house, and knowing that you had a one in 10 chance of the officers showing up being fully trained and licensed to do their job? Would you be comfortable with a trainee police officer searching your home, weapons drawn, with you and your family inside? Can you imagine getting on an airplane knowing that you had a one in 10 chance of a fully trained pilot being behind the wheel? You maybe thinking to yourself, "What do these examples have to do with power line work, or electrical work?"

The electrical trade in general, but most certainly the power lineman trades, are some of the most dangerous jobs being performed by people in the construction category in the world. Most of the firemen I talk to don't want to have anything to do with electricity. If there's an electrical problem, they protect the surrounding area, and wait for people like myself to show up. There's good reason for this. Electricity is one of few things in a world that you cannot see, smell, taste, hear, or feel, until it's too late. One mistake in the electrical/power line trades can end your life. In a lot of cases you won't even know you've made mistake until you wake up in hospital. This is not a trade where you want a bunch of on trained apprentices working on things, hoping that if they make a mistake, there will be a journeyman lineman there to correct them. Unfortunately in that scenario, it's most likely to be injury or death that makes them realize they made a mistake. In the electrical/power line trade, trainee (aka apprentices) ratios are there for a real reason. If you want some less biased opinion, talk to firemen, talk to

some police officers, and get their opinions about situations where they come upon down power lines or other possible electrical danger, that they are unaware of. I can promise you they want trained professional linemen there, with possibly one trainee with them. Not the other way around.

The proposed increase of apprentice ratios to Electricians and Power linemen, will result in increased injuries and death. There's no way it can't. Obviously a proposed change like this is being driven by money. It's being driven by the fact that if you can have 10 apprentices and one journeyman, you'll save money on wages. We all know that, it's pretty obvious. I don't even think the people that are pushing this agenda would disagree with that. But how many lives are worth saving money? If one of your family members was sadly involved in an electrical hazard, such as the automobile crash on top of an electrical box, or perhaps hitting a pole and a down power line being across their vehicle. How comfortable are you with knowing that there's a good chance that the power linemen that respond will most likely just be apprentices? Or worse yet they have received the ability to do journeyman lineman work, but have never undergone any type of testing or recognized apprenticeship training to do work.

As for the certificate of fitness itself,

Myself and other electrical workers pay for the state license, I'm happy to do so. It gives some guaranty to the level of training a fellow coworker that I may have to work with has achieved. Without a state certificate of fitness, I literally could be working with a person that was working at a retail store just couple weeks ago. I am happy to pay for a state certificate of fitness, because I know that it is worth the increased safety to do so. We do not want people introduced into our hazardous construction industries, whether it be electrical or otherwise, to have not taken any kind of testing proving that they at least have a rudimentary knowledge of what they're doing. That doesn't sound like keeping "safety first" as a priority to me.

In closing,

If you have not done so, I would highly encourage you to visit the IBEW apprenticeship academy, located on Potter and C Street in Anchorage. I think there you will see that we take the training of our apprentices very seriously. My industry spends millions of dollars a year to make sure we produce quality linemen and electricians who are properly trained and safe. Watering down the training requirements, and allowing people to receive a certificate of fitness, just because they have a notarized letter from "somebody" vouching for unverifiable training, will greatly degrade the safety of our industry.

Please let me know if you have any questions for me, or if there's any information that I can

provide to you about this subject from the point of view of a 20-year power lineman.

Thank you for your time

Ken Seagle

From: [Kenneth & Jean Kemmerer](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: ratio of ten to one for apprentices
Date: Saturday, January 11, 2020 6:46:16 AM

from: Kenneth Kemmerer journeyman electrician retired certificate number 00114401

To Whom It May Concern,

the ratio of ten to one for training apprentices is totally ineffective. The apprentice requires direct supervision of work performed. Ideally, this is done on a one to one ratio so that they learn the proper (NEC) methods of performing the work. With a ten to one ratio; at the end of the day a journeyman cannot go back and find out who performed the improper work, correct, and instruct the apprentice on the reason for the incorrect work (the NEC reasoning), and the proper method for meeting the violated code requirement. This proposal would basically violate the entire premise of reasoning behind establishing the NEC and NFPA to promote life safety and property protection.

Sincerely

Kenneth Kemmerer

From: [Kenneth Sweet](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 2:06:22 PM

Alaska Department of Labor

I am writing in regards to the proposed regulation changes to the certificate of fitness requirements for electrical and mechanical in Alaska. Our current regulations in Alaska require 8,000 hours of on the job training in conjunction with an essential education component founded in electrical or mechanical theory and at the completion of the training are required to pass an examination in their trade standards to obtain a journeyman certificate of fitness in the electrical or mechanical fields. Moving to a system that would allow 12,000 hours of just on the job training without an indentured apprenticeship requirement that regulates the requirements of a training program that mandates working experience in all areas of each trade specific task along with providing an education in the theory is opening the door to a future workforce that is incompetent and unsafe in regards to not only their personal safety but the public safety in our communities.

I have spent my entire adult life working in the electrical field in Alaska and I have direct knowledge of the unique hazards of the electrical industry and how it affects the public and my duty as a qualified electrical worker to build electrical systems that are safe for our communities that we live in. I also have an obligation to perform the work safely and effectively while training apprentices to recognize the hazards of the electrical industry and how to properly mitigate their risk to serious injury and death that we face daily in the electrical industry so that they can learn to perform their work safely and go home every night to their families.

These skills that I have gathered over my career were passed onto me from journeyman that were trained through the time-honored tradition of an indentured electrical apprenticeship that required 8,000 hours of on-the-job-training (OJT) working in a 1:1 ratio of journeyman to apprentice ratio in conjunction with an educational training program based in electrical theory. It is essential that this time proven method continues so that we can continue to live in communities where electricity is served to the general public so that we are safe from electrical hazards with high risk for injury and death and from electrocution and fires due to incompetent and negligent electrical systems built by student trainees working for journeyman electrical workers with a 10:1 ratio of student trainee that have no formal education or on the job training requirements.

I hold licenses in Alaska as a Journeyman Electrician, Electrical Administrator and a Professional Electrical Engineer. As a certificate of fitness holder, I am extremely concerned with the concept of having 10 student trainees working for me at one time trying to somehow accomplish work safely without injuring one of them or leaving an electrical hazard to the public. As an Electrical Administrator I would not sign off work performed by any electrical contractor in the state of Alaska that employed 10 student trainees to every journeyman as I am personally liable to certify that all the work was installed to codes and state regulations because I would have no confidence in the electrical systems built because of the lack of requirements of the student trainee program. As an electrical engineer I would not want any electrical contractor installing electrical systems that were engineered with my stamp on the drawings with a journeyman to student trainee ratio of 10:1 because I would have no faith in their ability to properly construct an electrical system with out electrical hazards because of their complete lack of time proven training from an indentured apprenticeship.

My entire career has been spent constructing, testing, operating, maintaining and engineering electrical systems in the State of Alaska and I don't understand where the current government administration has come up with these proposed regulations to change the industry's requirements for a Certificate of Fitness in Alaska. These regulation changes are not coming from anyone that has worked for a living in the electrical or mechanical fields in Alaska

because they would completely understand the hazards of our industry's both to the worker and the public and I feel that these proposed changes are highly unethical and have the potential to bring great risk to life and death to the communities that we live in.

Kenneth Sweet

Journeyman Electrician (Certificate of Fitness 2003039)

Electrical Administrator (License EADE1770)

Registered Professional Electrical Engineer (License 103643)

From: [Kevin Macdonald](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Dept.of labor proposal of new regulations
Date: Friday, January 10, 2020 10:24:40 AM

My name is Kevin Macdonald im a 25 year journeyman lineman in Fairbanks Alaska. I oppose the new regulations. I went to 8,000 hours of extensive training for my trade. My training instilled good safety practices. By allowing anyone with a driver's license to do my job without proper training is jeopardizing not only my safety but the public safety. I risk my life every day for my trade. This job is no joke. We preform at the highest level every day. This proposal is a serious mistake.
I OPPOSE THIS PROPOSAL

From: [Kimberly Thimsen-Whitehead](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 2, 2020 2:34:24 PM

From: [Knute Anderson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 13, 2020 9:33:43 AM

From: Kris Van Flein
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Apprenticeship Changes
Date: Wednesday, January 15, 2020 11:13:49 AM

I am emailing today to speak on behalf of the IBEW apprenticeship changes. As I understand this, these new changes would be seriously detrimental to the safety and productivity of all linework within the state of Alaska. We pride ourselves on knowing that the man or woman we are working next to are properly trained and we can count on each other to get each other home at night. This is essentially government trading cheap labor for the quality of life and potential livelihood of your Alaskan workforce. on behalf of the labor force of Alaska, do not impose these changes. Thank you.

R/s
Kris Van Flein
IBEW APP Lineman

From: [Kristin Debbin](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to Title 8
Date: Monday, January 13, 2020 10:23:35 AM

To Labor Standards and Safety Division, Alaska Department of Labor,

My name is Kristin Debbin, I am a licensed Journeyman Wireman in the states of Alaska and Washington. I began the 5 year apprenticeship program with the International Brotherhood of Electrical Workers in Tacoma Washington in 2003, and have been happily successful with my accomplishments in the electrical trade.

I am very concerned with the suggested proposals to make changes to Title 8. I cannot imagine anyone would be willing to cut our safety education standards in Alaska or anywhere. I do not agree with someone being given a job in a specific trade without the advanced training an apprenticeship has to offer. It was a commitment that I made to get where I am today, nobody just gave me a license, I had to earn it.

Please, think about what this really does for all people involved. To me it suggests the idea of making this a right to work state. When standards are lowered, and safety practices put aside there are no winners. It puts the consumer and general public at risk, our state needs to move forward not backwards.

Thank you for your time,
Kristin Debbin

[Sent from Yahoo Mail on Android](#)

From: [Kyle White](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:35:57 PM

I oppose the proposed Regulation.

I went through a Union apprenticeship and know the value of a structured apprenticeship.

I am a licensed journeyman plumber and a Mechanical Contractor.

Thanks,

Kyle White
Inside Passage Mechanical Contractors, Inc
3000 Vintage Blvd., Ste. 280
PO Box 32892
Juneau, AK 99803
(907) 780-2250 O
(907) 723-7738 C
kyle@insidepassagemechanical.com

From: [Larry Bell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Testimony opposing proposed regulation changes regarding electrical apprenticeship, training, testing, and working ratios.
Date: Monday, January 13, 2020 9:19:28 AM
Importance: High

To whom it may concern:

I am writing this letter to voice my strong opposition to the department's proposed changes, that would undermine the long standing, well thought out, and effective regulations that have served Alaska and Alaskans for decades. Specifically, I am concerned with those regulations focused on electrical training, state testing/licensing, apprenticeship, and ratios of journey workers to apprentices/trainees on the job.

I am personally able to speak as a current Employer Trustee to the Alaska Joint Electrical Apprentice Training Trust, commonly known statewide as the "electrical workers' apprentice program". I have served in this capacity for 20 years, overseeing one of Alaska's largest and most successful multi-employer training trusts. I am personally a product of that same program, thereby allowing me to experience it as an apprentice, journey worker, labor representative, and employer representative. Over the course of my time in governance thereof, we have continuously achieved our primary goal, to equip Alaskans to perform electrical work safely regardless of race, age, gender, creed or geography and prepare them for meaningful and lasting careers in the electrical industry.

A 10 to 1 ratio of trainees to journey level workers will not produce competent, safe workers. The electrical industry encompasses a broad scope of complex work, making this ratio unable to produce competence even with the proposed 12,000 hours OJT equivalency. Meaningful comprehensive training will not be possible in any in-depth fashion given such limited oversight. The clear result of this regulation would be to facilitate an ongoing pool of the cheapest possible labor with no real intention of giving anything but limited exposure to the most basic aspects of the trade. The vast majority of electrical construction projects do not lend themselves to an atmosphere where a lack of individual oversight can be sacrificed without harming the wellbeing of those involved and the systems being installed. This is especially true for those in the earliest stages of a career in the electrical trade.

I also question the thought process behind the proposed changes. The department's approach dismisses the effectiveness of the comprehensive classroom training and curriculum undertaken by multiple programs with a long history of providing the majority of the most qualified journey level workers in the electrical trade statewide. If the intent of the proposed changes is in fact to create more pathways to attaining journey worker status, I would propose that the State increase its past and current efforts at bolstering apprentice utilization and affording these industries more opportunity to place journey level workers and apprentices on projects statewide. Mandated apprentice utilization at a proven and responsible ratio is one method of growing those pathways.

Thank you for your timely consideration.

Sincerely,

Larry Bell

Executive Manager
NECA - Alaska Chapter
712 W 36th Ave
Anchorage, AK 99503
T (907) 561-1958
C (907) 244-4166
larry@alaskaneca.org
www.alaskaneca.org

From: [Larry Denig](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprentice Programs
Date: Monday, December 16, 2019 9:51:11 AM

From: [Larry Emerton](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Proposed regulations
Date: Monday, January 13, 2020 1:55:28 PM

Hello,

I am writing in regard to proposed changes to regulations concerning plumber and electrician requirements. I have worked as an electrician for 36 years, 27 in commercial construction and 9 in maintenance for the Municipality of Anchorage. I have some concerns about the changes in licensing and ratio of trainees to journeymen. I believe that an approved apprenticeship program ensures that the trainees get a proper background in the trade they are pursuing and ensures that they get broad experience in the requirements of the trade. Only requiring a letter from an employer opens the opportunity for people who may not have the necessary experience or skills to properly perform the job safely. I also believe that a one to one ratio is realistic for trainee to journeyman, two is marginal and 10 to one is dangerous and only benefits the employer with cheap labor. Please reconsider these changes as I believe that it will be detrimental, rather than helpful, to industry jobs in Alaska.

Sincerely,
Larry Emerton

From: [Larry White](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:33:05 PM

I strongly oppose the proposed Regulations.

There is no better apprenticeship for plumbers and electricians than a Union or other recognized program.

There is no way 1 instructor can control 10 student trainees.

I am a licensed plumber and Mechanical Administrator with 48 years in the trade.

Thanks,

Larry White
Inside Passage Mechanical Contractors, Inc.
3000 Vintage Blvd., Ste. 280
PO Box 32892
Juneau, AK 99803-2892
(907) 780-2250 O
(907) 419-7420 C
larry@insidepassagemechanical.com

From: [Leo Grasso](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to Journeyman certificate of fitness requirements.
Date: Tuesday, January 7, 2020 8:44:42 AM

To whom it may concern:

I am writing to express my strong opposition to the proposed changes of the Alaska administrative code regarding journeyman certificate of fitness for plumber, electricians and power lineman. Additionally I am adamantly opposed to the proposal for student trainees certificate of fitness. I have quoted the specific proposed changes below I am opposed to.

"8 AAC 90.160. Electrician journeyman certificate of fitness.

(B) documented proof on a notarized form provided by the department, or by notarized statements on letterhead stationery from employers, that the applicant has a minimum of 12,000 hours of legally obtained work experience in work subject to Register _____, _____ 2020 LABOR AND WORKFORCE DEV. 20 standards of the National Electrical Code established in AS 18.60.580 and 8 AAC 70.025; or"

"8 AAC 90.300. Student trainee certificate of fitness. (a) A student trainee certificate of fitness authorizes the holder of the certificate to perform work that is subject to the standards of the Uniform Plumbing Code established in AS 18.60.580 and 8 AAC 63.010, and the National Electrical Code established in AS 18.60.705 and 8 AAC 70.025, and under the conditions set out under this section."

"(c) The ratio of individuals working under student trainee certificates on a job site may not be more than ten student trainees for every certified journeyman, subject to the type of code work performed. "

I am currently employed in the electrical field and hold a journeyman electrician certificate of fitness. The documented hours along with classroom training provide the necessary skills to safely and efficiently work on electrical installations, which can be very hazardous.

The current regulation of having no more than two apprentices to one journeyman ensures that work is performed with adequate supervision and safety requirements are met.

The proposed regulation of having 10 student trainees to one journeyman is absurd. There is no way one person can effectively and safely supervise 10 trainees!

These proposed regulation would undermine a skilled Alaskan work force in areas that would affect public safety. Improperly installed gas and electrical systems can have dire

consequences to innocent members of the public that have no knowledge of how these systems work. It is our job as skilled trade workers to ensure the hazardous energy we work with is installed and maintained properly.

Please discard these proposed changes to the administrative code and keep what is already in place and works, registered apprenticeship programs with the proper journeyman to apprentice ratio and coinciding classroom training.

Thank you for your time,

Sincerely,

Leo Grasso

Soldotna, AK

From: [Les., DEB Syvertson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 13, 2020 11:27:41 AM
Attachments: [Title 8 apprentice ratio changes\[16948\].docx](#)

From: [Levi Frampton](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship AAC Proposed Changes
Date: Friday, January 10, 2020 9:21:07 AM

Attn: Becky Weimer
Dept of Labor and Workforce Development
dol.lss.regulations@alaska.gov

Dear Becky Weimer,

This email is in response to the proposed language changes related to State of Alaska apprenticeship programs. I manage operations for several Doyon Limited subsidiaries, one is signatory to the Pipefitters and the other is signatory to the IBEW. In the construction industry the required workforce for any given contractor may fluctuate greatly depending on the economic cycle and also the time of year. We are signatory to Union labor halls because it allows us to hire qualified, well trained personnel when required, and when not required they can easily go work for another signatory contractor. This pool of well trained and qualified Journeyman and Apprentices provides a valuable resource to the State of Alaska.

My concern with the proposed changes is that it will weaken the skill level of the workforce. The proposed language could allow sub-par apprenticeship programs to claim the same caliber of skill/qualifications as the accredited apprenticeship programs without being adequately vetted. Specifically:

8 AAC 90.140: We do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In our experience, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

8 AAC 90.300: We do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

Regards,

Levi Frampton
Vice President
Doyon Associated, LLC
907-374-9130

From: [lineman8181](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Thursday, January 9, 2020 5:01:34 PM

From: [Lisa M. Jones](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Eliminating license for wiremen/linemen.
Date: Friday, January 10, 2020 12:36:58 PM

From: [luka](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 5:30:15 PM

To whom it may concern,

I am in direct opposition to the proposed regulations regarding the dismissal of the apprenticeship program. I am extremely concerned for the health and safety of Alaskans and job security for tradesmen. If this proposition is passed, the quality of workmanship that is responsible for keeping the state safe and healthy will be in jeopardy. A journeymen is not just a card you hold, it is the representation of years dedicated to the trade and learning to do the job properly. A 10 to 1 ratio of Journeymen to Layman is unacceptable. This amount would be dangerous to all workers on the job site.

Thank you for your time,

Brother Schulz of the Local 367

From: [Luke Glesener](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Changes to the Alaska Administrative Code Regarding Apprentices and Trainees on Construction Sites
Date: Friday, January 10, 2020 4:59:07 PM

Attn: Becky Weimer
Dept. of Labor and Workforce Development
dol.lss.regulations@alaska.gov

Hello,

I am currently working through my fourth year of the plumbers and pipefitters apprentice training program offered through the Local 375 JATC.

In summary, I am against these changes to the Alaska Administrative Code, as they reduce the training requirements for the skilled labor in Alaska, hinder the opportunity to learn for those already in training programs or prospective entrants to training programs, and decrease the quality of construction in the State. All of these factors contribute to an unsafe work environment for the construction industry, as well as a degradation of the safety of the populace.

I do not believe any ratio of trainees above 1:1 in the field should be acceptable. At a 1:1 ratio you get to work with your journeyman 100% of the time he has available to teach. If you start to increase the number of trainees, especially to such a high number as 10:1, you decrease the amount of quality training time each of those individuals receives. A trainee working in that environment would have 1/10th the opportunity to learn as someone working one on one with a skilled professional. That is not fair to the trainees nor is it fair to the journey worker. The trainee is no longer learning the skills they need to be successful in their career, and the journeyman is then required to spend an inordinate amount of time managing and observing the trainees under his tutelage. This situation would drastically decrease the quality and efficiency of the work produced by the journeyman as well as the future quality of any work performed by the trainee.

In an industry where the forces, energy, and health hazards being handled can become lethal for those who do not know what they are doing, training and experience are of paramount importance. If you throw such a high percentage of untrained personnel into a construction site, the likely hood of a work place injury would drastically increase for both the trainees as well as any other person working on that site. Many times safety issues arise because of a lack of intuition or understanding as to when a situation is unsafe, and if the people around an unsafe individual do not know any better either, then they do not speak up to rectify the situation and can become injured themselves. This knowledge is built through guided experience and training.

Poor quality construction by inexperienced electricians and plumbers can lead to deaths, injury, disease, and property damage for the people of Alaska. Poor wiring can lead to fires and subsequent smoke and water damage, failed heating systems, or electrocution hazards. Bad plumbing can lead to water damage in homes or ground contamination from leaks, the spread of infectious diseases from improper water protection or sewage handling, buildings freezing in winter from failed hydronic systems, or explosions from gas leaks. You want the people building these systems to be

experienced and meet the utmost standards to become licensed. The only way that will happen is if they receive adequate training and the opportunity to learn in an environment that is conducive to that goal.

There is a lot to learn in this field, and I look forward to my continued education throughout my apprenticeship and my career. I hope you see fit to give others the chance at the quality education they deserve in an environment that is safe for them, those around them, and the public as a whole.

Thank you.

Luke Glesener
American Mechanical
(907) 371-1225

From: [mackenzie fosberg](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 6:59:53 PM

From: [Marc Dugas](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: I oppose the proposed changes.
Date: Friday, January 10, 2020 10:35:51 AM

To Whom It May Concern, I, Marc Dugas, a Journeyman Lineman, (11 years) oppose the new changes being proposed. Please keep Comprehensive training requirements alive and the safety of skilled labor alive as well. 8k hours of on the job training with ONE Journeyman is quality training. Not 12,000 hours of plain old work with 9 other people. Please keep Apprenticeship programs strong. Thanks, Marc Dugas

Sent from my iPhone

From: [Margie Goodrich](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship standards
Date: Wednesday, January 1, 2020 11:26:50 AM

I strongly oppose reducing or eliminating apprenticeship standards of competency. I'm now 64, but I started in the pipeline days without any training and did not have enough hands on work to become proficient in anything. Without a guarantee of proficiency, the youth of today that are looking for meaningful work in the trades will be providing less than adequate much less superior work. With union training facilities they make sure that the students know what they're doing and do it well, and do it correctly and safely based on the standards. If you want roads built well, or houses to continue to stand without damage then you want well trained people to be working on them. For the employer who is looking for well trained competent employees, they will have to endure a trial and error with employees to see if they actually know what they need to know to do the job possibly causing delays and additional expenses, subsequently adding to the cost a building whether it's houses or roads.

From: [Mark Golden](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: plikat@ualocal367.org
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Sunday, January 12, 2020 8:20:12 PM
Attachments: [Union Support Letter.docx](#)

To whom it may concern:

Recently, it was brought to my attention that changes were being proposed that would affect the way apprenticeships would be handled in the state of Alaska. I am writing in response to these changes because I care about the safety and future of my state. I am a journeyman with the Local 367 and an HVAC Technician. I came up through the trades non-union and was later recruited into the union. I believe my experience is relevant to the current conversation.

I went to trade school in 2009 for HVAC/R in Las Vegas and was top of my class. I soon was introduced to the trades. Being non-union, there was no protection or standard for the worker. I lost my second job because I would not crawl off a ladder onto a tile roof. My inner voice told me not to do it. The dispatcher told me to get on the roof in not so polite words. After a decade in trades, I now know I would have fallen two and a half stories if I didn't listen to that intuition. A friend of mine from school withered at that place for two years and never made \$30,000 a year. He now cleans the restroom at Caesar's Palace.

I had to go the non-union route because in the lower 48 the recession was so bad the books were closed at the unions. I went to a local trade school for HVAC, but even today, 10 years later, it haunts me I wasn't able to get a true apprenticeship. The unions were weak in Vegas. Most of the members were travelers and on construction projects. The locals were all nonunion or stuck in some limbo of some union national contract. The national contract kept workers away from education, apprenticeship, experienced workers, retirement and success. I performed multi-million dollar state projects on schools with a superintendent that was not even a journeyman. How is that safe or in the best interests of any incorporated entity.

Alaska has truly been good to me. I truly found peace in this place. I care more about this land and its people than I ever thought would be possible. However, the struggles of the unions have become apparent to me. I see union employers struggling to stay competitive with nonunion shops specifically because they employ apprentices and have a hard time billing or justifying their presence on a jobsite. To burden a journeyman with more than one apprentice's safety and training is irresponsible to the customer, contractor, journeyman and apprentice. One on one training is what the consumer and trade deserve. I enjoy training the next generation. Please don't take it away from us.

The building trades are very serious. They involve public safety, especially HVAC/R. Many of the conversations I have had with apprentices are how to prevent carbon monoxide from entering a building (a silent killer), how to braze and weld in an occupied building without catching it on fire, how to not fall off a ladder, how to prevent pipes from freezing, etc. These are not light subjects. These are not easy skills to learn. They have to this point been one on one. Please don't turn the jobsite where these skills and knowledge are passed on into a classroom where work ceases and everyone suffers.

So now I feel a need to explain why I think the union path is a good one. My own career has suffered due to a lack of education that is available through the union apprenticeship. It has also suffered due to a lack of training I would have gotten on the job with other journeyman during an

apprenticeship. I was thrown to the wolves and had to teach myself most everything. I would have never stayed in the trades, but there was nowhere else to go in the lower 48 at the time. Don't get me wrong, the trades have been good to me, but the lack of training would have steered me in other directions if they existed. Now, I am hearing about legislature that would weaken the training that currently exists. I am sure that the businessmen that are proposing it have their own best interests in mind, but for the sake of the state and public safety please don't let their private interests weaken and cheapen our great state of Alaska.

Sincerely a servant of Alaska,

Mark Golden, Journeyman HVAC/R Technician

702-423-5371

907-802-0010

PO BOX 872214

Wasilla, AK 99687

Sent from [Mail](#) for Windows 10

From: [Mark Talbert](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Saturday, January 11, 2020 5:26:38 AM

So why not eliminate training standards for doctors too?

What are thinking? Next time you or family member is in a hospital room with mask on remember that some plumbers ran the miles of pipe to that oxygen tank outside the building.

Would like some under trained goof putting the pipe together for your wife or kids? How about it? Have you thought about what could happen to that brand new grandchild that's born prematurely? With a heart monitors wired by an apprentice that has only ONE journeyman watching over 10 young people installing that wire to an emergency back up generator.

If you vote for your wallet and someone dies remember you did this.
Don't vote for this!

Mark and Karen Talbert
PO Box 877972
Wasilla Alaska
99687

Sent from my iPhone

From: [Marx Smith](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed DOL Regulation Changes
Date: Saturday, January 11, 2020 6:02:07 AM

To whom it may concern,

I am a 4th year wire-man apprentice and I **oppose** your proposed regulations that would not only devalue the work that federally registered apprenticeships have put into properly training their workforce, but would also (and more importantly) increase the risk of accidents in a very dangerous field.

The new "trainee" regulations that let anyone who works get 12,000 hours of "experience" without being tested reduces the quality of the workforce. Electrical work is not an unskilled position and without the constant rigorous testing that an apprenticeship program provides, how do you know that some person with 12,000 hours of working as an electrical trainee can safely do the work?

The biggest regulation change I oppose is the 1:10 Journeyman-Trainee ratio. Not only does that ratio create a huge bidding gap between contractors who use proper 1:1 ratios, but would also flood the market and increase the danger of the job. Each person learning the trade should have a licensed and experience journeyman to properly instruct them on electrical work. A 1:10 ratio will ensure that not everyone learning the trade will be properly supervised and instructed at all times.

Please do not make these proposed changes. They would increase the risk of accidents on the job and devalue the education that people who went through proper apprenticeship programs earned.

Thank you for taking the time to read my public comment,

Marx Smith

From: [Mary Corcoran](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 2:36:39 PM

From: [Matt Kruger](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 3:10:37 PM

From: [Matt Whitaker](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 11:58:31 AM

From: [Matthew Amor](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 5:29:26 PM

As an Apprentice Plumber, I feel threatened by the way this administration is proposing these laws by increasing the ratios of journeyman to apprentices and also the process of getting your fitness card. First of all, having a 1:1 ratio works. It gives the apprentice more knowledge because of the journeyman having to help him instead of the 9 others you are trying to input. It would put more stress on the journeyman and company by having so many people under you while making sure they are done correctly and safely. I can't stress enough of how important the safety of the worker is in the construction industry. People can die because of this. Also on another note, the hurdles we had to get to have our fitness card is necessary because training and safety is always the first priority of a project. Who would want something be done incorrectly? Who would want someone to die because there isn't a journeyman or foreman watching what they are doing? All these come to play when a new person with no experience whatsoever joins the construction. Once again training and safety is always a must for you to get the fitness card. Please reconsider your proposals

Get [Outlook for Android](#)

From: [Matthew Wallace](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship Changes Proposal
Date: Monday, January 13, 2020 3:05:10 PM

Good Evening,

I am writing to voice my disapproval of the proposed regulation that will make changes to the apprenticeship programs involved in the electrical and plumbing skilled trades. The changes would cause a dramatic increase of injuries on the job in these trades. The apprenticeship programs have been created and utilized for many years, for one basic reason. Safety. Nothing is more important than the welfare of each worker on a job site. These proposed changes would allow an increase from one apprentice per journeyman to ten! Extra unskilled laborers on a job site without proper training and supervision will cause for dangerous work environments as well as ruin the pay scale for these middle class American jobs. If you truly care about Americas working class you will not pass these regulation changes. Thank you for listening and I pray you make the smart choice for existing and future Alaskan skilled trade workers.

Regards,
Matthew

From: [Maverick Boyer](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 7:56:35 PM

From: [May, Nathan J.](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Concerns over proposed electrical licensing changes.
Date: Friday, January 10, 2020 1:53:52 PM
Attachments: [image001.png](#)

To the Commissioner.

I am writing today to voice my concerns about the proposed changes to the electrical licensing requirements.

Having been a journeyman electrician for 34 years and a Alaska Electrical Administrator. I have had the opportunity to mentor at least a hundred electrician apprentices. I take great pride in the fact that the skills I have delivered to each one of them has kept them safe and away from harm in their careers.

It cannot be emphasized enough how important it is to teach these skills properly. It takes many hours of attention and discussion to reach the level of competency needed to become a Journeyman Electrician capable of not getting oneself or others killed. I would hate to see regulation changes that will create a poorly trained workforce in the future. I care about my previous apprentices and coworkers well being too much.

I am guessing the request for change is coming from a training center. I can see the reason that the ability to have 10/1 apprentice ratio seems like a good idea. But it really does not work beyond that. This seems like a scheme to create a "Diploma Mill" for profit.

Alaska is not in the position that the rest of the country is in, we are actually the highest state for UNEMPLOYMENT. 2019 at 6.4%. It don't seem like a good idea to loosen the licensing requirements to flood the workforce with under trained, minimum skilled trainees just to make a training center more prosperous.

The same for the requirement to be able to test out as long as you have hours. Seems irresponsible and dangerous.

Lineman not needing to take a test to become a journeyman lineman, same thing, seems irresponsible and dangerous.

Our state requirements, and regulations, have been built on blood, pain and loss to become what they are now. I do not see a need to deviate and see how it works out.

All of these proposed changes will be ABUSED in the future, no matter how well meaning they are now. Leave them alone.

Thank you for your time, Nathan May.



NATHAN MAY
BP Electrical Lead Tech
907-659-4780
Harmony 758-2170
Alternate- Peter Mckay

From: [Michael Reynolds](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship regulations
Date: Friday, January 10, 2020 10:08:03 AM
Attachments: [image003.png](#)

To Whom It May Concern,

I am writing today to express my **STRONG OPPOSITION** to the proposed regulation changes effecting the skilled trades in Alaska. I have been through an accredited apprenticeship program with the IBEW and I have work in a leadership role in in the electrical industry. The proposed changes will not only weaken the ability for ALASKAN contractors and workforce to secure work in ALASKA, it will greatly increase the danger to my fellow tradesmen, and end users. Proposing a 10:1 apprentice to journeyman ratio is not safe, and serves to please only large out of state contractors that are only interested in low dollar, low quality installs. There will be little regard to proper on-the-job training and pertinent class time, and this will lead to injury and death to workers and the public.

Alaska has long had a record successful apprenticeships established by contractors and craftsmen that have been reliably and successfully providing the state with a well trained work force for decades. This decision should not be made light heartedly, there will certainly be more risks with the proposed changes. These are risks that have been mitigated by proper training and apprenticeship.

Thank you for taking the time to read this.

Michael Reynolds

General Foreman, Wireman

Alcan Electrical & Engineering, Inc.

Fairbanks, Alaska

Main: (907)452-1771

Cell: (607)229-5800



From: [Michael Rodgers](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 10:28:51 AM

From: [Michael Rodgers](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 2, 2020 10:11:32 PM

From: [Michael Speciale](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Updates to labor standards and safety regulations
Date: Friday, January 3, 2020 11:18:56 AM

To Lt. Governor Kevin Meyer through, Department of Labor Commissioner, Dr. Tamika Ledbetter.

Allow me to introduce myself. My name is Michael Speciale and am a Brother in the International Brotherhood of Electrical Workers Local 1547. I write today standing in direct opposition to the proposed regulations changes of Dec 4, 2019, set to affect multiple sectors in the building trades industry. Making these proposed changes will ultimately culminate in a net loss of value to our state. To save us from a thesis, I will reduce my concerns to a pithy quote.

“We know the value of the things for which we suffer. In this modern day and age, things and people are not actually losing value; but it is the knowledge of the value that is lost. Because in this day and age, everyone wants something that is easy. The easier, the better. And therefore, all value is lost, and lost from all things that exist for which one has not toiled or suffered to some degree. All things valuable are worth suffering for. And indeed, the same thing can be multiplied in value, when you add your blood to it through suffering for it.”
C. JoyBell C.

Proposal of an “alternative path” and allowing for a “ten-to-one” training ratio will only lead to a loss in knowledge; ergo a loss in value to our state. I trust that you will heed this warning and make the necessary steps to ensure our buildings and power are constructed without jeopardizing the value of what one-on-one training provides by maintaining the integrity of the current apprenticeship training process.

Cordially,
Michael Speciale

From: [Michelle Gillette](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Friday, January 3, 2020 2:17:11 PM

From: [Mike Desmond](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Regulation Changes 8 AAC 90.140 and 8 AAC 90.300
Date: Saturday, December 28, 2019 9:52:00 AM

8 AAC 90.140: I do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In my opinion, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, nor is it in the best interest of the Trainee.

8 AAC 90.300: I do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, nor is it in the best interest of the Trainee.

Accredited apprentice training programs are subject to rigorous standards and are subject to review and approval by BAT.

Mike Desmond
Mechanical Administrator #MECM77
President, Western Mechanical Inc.

From: [mike lucas](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New proposed regulations are bad news
Date: Sunday, January 12, 2020 4:04:38 PM

My name is Mike Lucas. I'm a power lineman at ML&P. I am very concerned about the new proposed regulations that will make my working conditions and all Alaskans in the skilled trades more dangerous!!! The apprenticeship programs are necessary in training apprentices to be skilled journeyman in dangerous fields of work. By allowing 10 trainees to 1 journeyman, it is breaking down safe working conditions and putting all at risk. I know, from personal experience of the dangers. I was working as a trainee for 6500 hours as a lineman trainee without any formal training. Truly, only by the grace of God, was I not killed on the job, as I did not have the proper training and knowledge of my work. I was fortunate to get into the apprenticeship program where I worked 8000 hours under skilled journeyman lineman and attended schools for proper training and understanding of the dangers of the industry.

I am also a veteran, and truly believe in giving veterans a real opportunity to be reintroduced into the civilian workforce with apprenticeship opportunities!!! These men and women have sacrificed all for our freedoms and these apprenticeship programs allow them to use their GI Bill in being trained in a skilled trade and being able to make a good, fair working wage for themselves and their families.

Please, lets keep the skilled trades in Alaska safe for all the men and women in the industries. The new proposed regulations will hurt our future workforce by allowing companies to use trainees as cheap labor and pay low wages and encourage out-of state labor. The apprenticeship programs in Alaska will keep developing our Alaska workforce! The proposed regulations will weaken the work force and put all at risk in some very dangerous industries where safety and solid understanding of the job is critical in providing a quality product to the customer and consumer.

concerns,

Thank you for considering my real

Mike Lucas

From: [Mike McGlinchy](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Mike McGlinchy](#)
Subject: Dept. of Labor & workforce Development Apprenticeship Language Changes
Date: Friday, January 10, 2020 9:25:42 AM
Attachments: [Dept.Labor & Workforce Letter 1-10-20.pdf](#)

Mrs. Becky Weimer,

Attached you will find a letter opposing the language changes to the State of Alaska Workforce Development current regulations. As a contractor in the State of Alaska for the last 40 Plus years the apprenticeship program is very crucial to our success and would not want to see changes that would change any of the current regulations to this program.

Please advise if you need any further comments.

Thank you

Mike McGlinchy

TCI Construction Company, Inc.
3680 Lathrop Street
Fairbanks, Alaska 99701
Office (907) 452-1792
Cell (907) 750-0453
Fax (907) 452-8207
mmcglinchy@tci-construction.com

From: [Mike Milligan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeships
Date: Monday, December 16, 2019 12:14:39 PM
Attachments: [2019-12-04-LSS-Notice.pdf](#)

From: [Mike Notar](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Mechanical Inspection Proposed Regulation Changes
Date: Thursday, December 19, 2019 1:52:30 PM

To whom this may concern,

The proposed changes that would eliminate the "apprenticeship" requirement and replace it with a "trainee" standard is not something I'm in favor of. Apprenticeship is certainly the best way to learn a trade, with both on the job and classroom training being utilized to produce a competent and knowledgeable Journeyworker.

I am also against doubling the number of trainees who could be supervised by a journeyworker. This would be too many yet unskilled workers for one journeyworker to be responsible for. For occupations where a single error can result in death--not just for individual workers, but others on a job site--these changes present a clear and present danger to the life and safety of Alaska workers, and must be discarded. Please reconsider these changes and leave what is already good practices alone. Sincerely, Mike Notar 9350 Northland St. Juneau, AK 99801

From: [Mike Snell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: MIPL 146/161
Date: Monday, January 6, 2020 12:34:47 PM

Hello my name is Mike Snell. I am emailing today in protest to the proposal to eliminate the need for apprenticeship and certificate of fitness for electrical workers. As a Union Power Lineman with IBEW local 1547 I understand this need as much as anyone. The work we do is extremely demanding and quality training is paramount. Any lessening of training and certification is unacceptable. If this change in regulation occurs there will be added injuries and hazardous work done that will expose workers and the public to injury.

Thank you for your time,
Mike Snell

Sent from my iPhone

From: mike1533@acsalaska.net
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fwd: propped changes to apprenticeship levels and training
Date: Monday, January 13, 2020 12:20:35 PM

From: [Nathan Lapierre](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 6:45:41 PM

To whom it may concern,

Please rethink the new proposed regulations. Plumbing and electrical work takes many years to master. Completing an apprenticeship is the first step to becoming a skilled tradesman. Every job is different, every company is different, and our climate makes for challenges. Please, for the safety of our workforce, and the public, keep apprenticeships standards high. Require current journeyman to complete continuing education. It's in the best interest of everybody!

Thank you,
Nathan Lapierre
UA local 367

Sent from my iPhone

From: [Nathan Smith](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 8:58:00 PM

Hi. I'm Nathan Smith. I apprenticed as a power lineman here in Alaska from '99 to '04 when I turned out as a journeyman. I have been continuously employed here in this state in this trade from '04 to the present. The apprenticeship/trainee regulations that we currently have work well. They are there to facilitate safety and the actual learning of a trade and achievement of a journeyman license by the trainee-and prevent employers just using these workers as cheap, disposable labor. I oppose the cheapening of our regulations in this way and this attempt to make provision for our trade work to be diluted—given away to untrained, unlicensed individuals—typically lower paid and probably non-residents. Do not go ahead with these changes, please—we the trade workers who build and maintain the infrastructure of the state are the ones who would endure many of the repercussions of those bad decisions. Thanks.

Sent from my iPhone

From: [Nona Dimond](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Friday, January 3, 2020 10:11:50 AM

Please seriously take a look at the new proposed regulations from the Dunleavy administration. Gov. Mike Dunleavy's Department of Labor commissioner has released draft regulations that would wreak havoc on Alaska's construction apprenticeships. These regulations would eliminate career pathways for veterans, while destabilizing our business environment and killing jobs, while creating unsafe working conditions for our working women and men in the trades.

THESE NEW REGULATIONS WOULD —

- Remove apprenticeship from electrical and plumbing trainee licenses. In fact, no training program would be required for someone working on residential, commercial, or industrial construction in these hazardous fields.
- Create fully licensed electricians, linemen and plumbers with no skill or knowledge in their field. By removing the training requirement, a worker could spend their time as a trainee performing any task at all, and after 12,000 hours receive a full journeyman license. Whether it was sweeping up after the electrical workers, taking out the trash, or performing a single simple task over and over, the worker would qualify for a full license.
- Create a new "student trainee" license that would allow 10 trainees to every journey worker in these highly hazardous professions. The current apprenticeship standard of 1 to 1 ensures proper training and supervision, as well as public safety through ensuring skilled installations.

Nona Dimond

IBEW 1547 Juneau
813 W 12th Street
Juneau, AK 99801
(P) 907-586-3050
(F) 907-586-9614



From: [Oliver Goard](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 1:34:21 PM

Deregulating these apprenticeships and licensing requirements will only hurt the state and the lives of these skilled craftsmen. Letting unskilled labor take the jobs of trained and qualified tradesmen hurt our middle class and will produce a inferior product that may be dangerous or last as long as the design intent. Costing the state countless of dollars over time of repairs and/or put peoples lives at risk of death or injury. These are the trades that we want the most skilled and dependable candidates for.

That is why there are apprenticeships and license requirements in the first place. Have we forgotten already?

From: outlook_D45D6439F1F39320@outlook.com
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Trained Apprentice or Not
Date: Monday, January 13, 2020 12:29:43 PM

From: [pamela cline](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:52:08 PM
Attachments: [cid856EBE76-DF54-4412-8A16-379F2ED8A7DA.pdf](#)

From: [Patrice Parker](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Deregulating electrical and pipe fitter apprenticeships
Date: Monday, December 30, 2019 9:53:10 PM

Please reconsider changing the regulations to reduce costs of training and hiring apprentices. The rules and regulations are there for a very good reason - to protect the lives and limbs of the workers, and to protect the public from the dangers that come from shoddy workmanship.

You don't have to do much research to find plenty of examples of cost-cutting that leads to tragic consequences. And the consequences aren't just to the workers and the public. There is also a huge financial consequence to businesses that fail to protect the public. Lawsuits take down those companies that save pennies and lose millions.

Patrice Parker

1550 H St.

Anchorage AK 99501

Sent from my iPhone

From: [Patrick Darby](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#); [Labor, Commissioner \(DOL sponsored\)](#)
Subject: In regards to proposed changes to 2019 regulations
Date: Friday, January 10, 2020 12:08:47 PM

Thank you for your time and attention. I'm writing to state my firm opposition to the changes being considered to the existing standards for Journeyman plumbers and electricians. As a tradesman in telecomm, myself, I can state the need for the strong 1 to 1 journeyman to apprentice ratio. This is how we pass down the knowledge that works. Then, the need to pass a knowledge exam is how we ensure that our Alaskan Workers have the skills and knowledge to compete. I'm sure that every rational person can see the need to maintain our current high standards for these industries. Please do not capitulate to lobbyists that want to dilute Alaskan wages and Alaskan standards.

Sincerely,
Patrick Darby
8017093522

From: [Patrick O. Donnell](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship
Date: Monday, December 16, 2019 9:47:56 AM

From: [Paul Robarge](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Dol proposed changes
Date: Friday, January 10, 2020 4:02:23 PM

From: [Peter Jurczak](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 12:46:18 PM

I have carefully reviewed the proposed regulations and strongly object to the regulations proposal. This will put Alaskans out of work. Out of state construction contractors will take advantage of these changes to bring in unlicensed, untrained plumbers and electricians. We have a very good trainee/ apprentice program in Alaska. The training and experience requirements for apprentices produces quality well trained journeyman plumbers and electricians.

The other issue is these proposed changes will cause untold cost to consumers from poor quality and dangerous substandard installations of plumbing and electrical work. This is a dangerous and reckless regulation change.

Alaska produces quality craftsman in the plumbing and electrical trades, both union and nonunion.

Lastly, this one more reason to recall Gov Dunleavy, and his shameful Administration.

Peter Jurczak
1309 Edgecumbe Dr
Sitka, Alaska 99835

907 623 7513

Sent from my iPhone

From: [Peter Jurczak](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Wednesday, January 8, 2020 5:03:01 AM

I have been a licensed plumber since 1981 in Alaska. I have seen results many times over from untrained electricians and plumbers in their trade. Unsafe installations and property damage caused by fires, water damage, unsafe food services, that cost consumers millions of dollars in damages.

Alaska currently has one the best trained work forces in the country. The plumbing and electrical trades are something we can really be proud of.

Please do not lower the existing standards for apprentice plumbers and electricians in Alaska. This would turn the clock back 50 years in lowering our standards. Untrained plumbers and electricians is a terrible idea. Keep the existing apprenticeship standards

Peter Jurczak
1309 Edgecumbe Dr
Sitka Am
907 -623 -7513

Sent from my iPhone

From: [quinn Malcolm](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: opposition to proposed D O L regulations for apprenticeship
Date: Friday, January 10, 2020 9:49:58 AM

to whom it may concern:

i am contacting you in respopnse to the proposed change in labor regulations concerning the ratio of apprentice to jnyman scale and the requirements of becoming a journeyman line man

i am apposed to these changes as i am a 24 year member of the ibew i have seen and worked with the current standings and deem them the appropriate way to continue.

these new regulations will do nothing but drive wages down and increase accidents in the work force

having men and women improperly supervised and taught will only increase the rates of injury and death on the job

please vote no and appose this .

thank you

quinn malcolm

From: [Rachel Mulvihill](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Opposition to proposed regulation changes
Date: Monday, January 13, 2020 3:40:44 PM

I would like to express my opposition to the proposed changes to the electrical and plumbing licensing regulations. I have learned a lot about the electrical industry since I started working as the Administrative Assistant for the Alaska Joint Electrical Apprenticeship And Training Trust over three years ago and there is a lot that goes into educating new electrical workers that I never would have thought about. I have seen the dedication that it takes for apprentices to learn the complexities of electrical theory while also balancing the demands of working in the field safely. I can now appreciate the skills and knowledge that are required for keeping both workers and the general public safe. These proposed changes to the regulations would allow for serious health and safety consequences. Over the last few years I have encountered several individuals looking for training through the AJEATT because they did not feel like their current programs provided enough theoretical and mentored learning opportunities to adequately prepare them for their work. I believe that this will become the norm if these proposed regulations are adopted.

From: [richard shank](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 3:31:35 PM

Dear important people in power.

Skilled & trained labor is not a joke. Not anyone can Just do what I've been doing since 1991. Without being trained & have been experienced.

Having a large labor pool of trained & skilled workers is why we're a leader on a global scale. Plumbers protecting our health from disease's. Electricians delivering useful and consistent power.

On & on. If the quality of these basics are lowered, by everyone getting paid the same. What incentive would we offer somebody that is more skilled and knowledgeable than somebody that we just picked up from off the street, or someone that had never touched any of these things that were working on?

R Shank 907-322-7370

From: [Richard Smith](#)
To: [DOL LSS Regulations \(DOL sponsored\); Richard Smith](#)
Subject: apprenticeship changes
Date: Sunday, January 12, 2020 9:01:33 PM

Dropping the requirement that plumbing and electric apprentices be registered under an accredited program AND increasing the number of apprentices being trained by a journeyman to TEN will create havoc and disaster. The journeyman will not be able to get his work done in trying to train TEN journeymen at the same time and the apprentices, not being involved in a program, could be set to any menial task and will finish their required hours not knowing what they need to function as journeymen. OBVIOUSLY, the people who have proposed these changes haven't had any experience in the plumbing or electrical trades. These changes endanger the construction trades in Alaska and all the people who might be affected by dangerous errors the poorly trained apprentices would make. Construction CODES MUST BE RESPECTED AND ENFORCED.

VERY SINCERELY,
Alice J. Smith
Sitka

From: [Rick Spencer](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulations
Date: Wednesday, January 8, 2020 2:26:31 PM

I am a retired IBEW Lineman that had 38 years in the trade . I was born in Alaska , started in the IBEW apprenticeship in 1967 and proudly taught high time apprentice linemen several times at the Kornfeind Training Center .

The building trade unions and their contractors spend millions every year to create the best trained workforce in the nation . These programs train 75 percent of all the construction apprentices in the United States . All their programs are Department of Labor registered . These apprenticeship programs have enabled a qualified journeyman workforce to perform a safe and efficient work site for their employer and the one requesting the work. Before the IBEW came into existence there were instances of one out of every two Linemen being killed on the job , thankfully , and in no small way due to IBEW efforts , those days are long gone . With the way I read the proposed regulations , this is not a continued path forward but a retreatment toward the past .

Particularly offensive to me is the 8AAC90.300 c.) , allowing student trainees ratio to be 10 for every one journeyman . Are you serious ? I do realize that the push behind these proposed regulations is propagated by other contractors that would like to cut corners in safety and quality to boost their profits . I would hope that the current licensing requirements for apprentices and journeymen will be retained as they presently are.

They have worked very well in Alaska and there is no viable reason to change them in this manner.

Respectfully ,
Rick Spencer

From: [Robb Ashburn](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: We need apprenticeships
Date: Saturday, January 11, 2020 4:54:30 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Robb Ashburn and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Robb Ashburn

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From: [Robert Glorioso](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fwd: Help oppose these job-killing regulations.
Date: Thursday, January 2, 2020 3:24:21 PM

From: [Robert Glorioso](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprenticeship programs for electrical and. Pipe fitters
Date: Monday, December 16, 2019 3:23:38 PM

From: [Robert Schachle](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 2:29:20 PM

My name is Robert schachle

I'm an IBEW journeymen linemen member card #7707420

I've been a member for 10 years and in my career I've seen and witnessed in train workers in my field of work do very dangerous task in result in people getting hurt and damaging equipment. With their lack of experience and knowledge because they aren't trained correctly in the line of work causes them to have accidents causes the job to take longer and be done incorrectly. In result of having trained workers to go back and finishing jobs.

I truly think by bypassing Apprenticeship and taking away the fitness card I believe it will hurt Alaska as a hole. Alaska is known for skilled hard working men and women why should we change that by letting untrained people be able perform skilled work and labor

Robert schachle
7707420 ibew

From: [Robert Yost](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fwd: Help oppose these job-killing regulations.
Date: Thursday, January 2, 2020 10:38:07 AM

From: [Royce Holmes](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Monday, January 13, 2020 11:55:21 AM

From: [Ryan Andrew](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed changes to Alaska Statute, Title 8 requirements
Date: Sunday, January 12, 2020 12:24:58 PM

To Whom It May Concern,

My name is Ryan Andrew and I am a proud journeyman electrician and lifelong Alaskan. Thank you for the opportunity to express my objection to the Department of Labor's proposed changes to Title 8, requirements for certificate of fitness. There are several proposed regulation changes that I will address separately:

First, the proposed change to allow for a jobsite ratio of 10 "student trainees" to be supervised by 1 journeyman electrician. It is clear that the person proposing this change is woefully unfamiliar with the hazards of performing electrical work and has no practical experience with construction jobsites in general. The electrical trade is not only hazardous while performing the work, but also poses a significant public safety risk if not performed properly. There is no practical way for one journeyman to effectively supervise ten "students". This is evidenced by the fact that the State of Alaska currently allows for a maximum ratio of 2 apprentices to 1 journeyman, and the Federal Department of Labor guidelines that allow for a maximum ratio of 1 apprentice to 1 journeyman.

Second, the proposed change to remove the requirement that a trainee electrician be registered in a federally administered apprenticeship program. This change also represents a significant safety risk for the construction workforce as well as the general public. Oversight of apprenticeship programs by the Federal Department of Labor is crucial to ensuring that workers are protected. Registered apprenticeship programs must have documented standards for training that address requirements such as supervision, type of work experience obtained, related classroom instruction, and more. Allowing anyone to obtain a trainee license and walk on to a jobsite by simply paying a fee to the Department is reckless and ill-advised.

Third, the proposed change to allow for 12,000 hours of "industry experience" that need not be obtained in a registered apprenticeship. This change threatens to weaken the strength of the Alaska journeyman license and risk the loss of reciprocity agreements with other state licenses. This would have a negative impact at a time when our construction industry is still recovering from our recent recession and much of our workforce has been forced to travel for work.

And finally, the proposed change to remove the requirement for a certificate of fitness holder to perform the excavation and backfill of electrical trenches. Excavation and backfill of these trenches requires intimate knowledge of National Electrical Code requirements, such as burial

depth and type of material that won't damage conduit or cable installations.

In closing, apprenticeship programs are a tried and true method for training the future construction workforce. These proposed changes would severely weaken that model if adopted, resulting in unsafe installations and unnecessarily putting our construction workforce at risk. I highly recommend that the Department withdraw these proposed changes.

Respectfully,

Ryan Andrew

From: [ryan burnett](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 12:57:04 PM

Hello,

As a new journeyman electrician that just finished his apprenticeship I strongly oppose this proposal. Apprenticeship as it is structured now is crucial to worker and public safety. Plumbing and electrical work pose many hazards to the workers and the public both. The proposed ratio change from 1:1 to 10:1 for journeyman/apprentice ratio is unfathomable. I could not imagine trying to learn hazardous tasks with 9 other apprentices and just one teacher. If this proposal was to pass it would not only endanger all Alaskans it would also damage a already hurting middle class Alaskan economy. I'm urging you to not change apprenticeship requirements.

Sincerely, Ryan Burnett

Sent from my iPhone

From: [Schaffer John](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proper and accountable Apprenticeship Training
Date: Monday, December 16, 2019 2:36:06 PM

As someone with many years in the trades I know first hand the value people being trained thoroughly for safe work practices and conditions in Alaska Construction. Any and all changes in the thoroughness and accountability of any apprenticeship processes should be expanded and not curtailed as is being proposed for the electrician and pipefitting apprenticeship programs. The proposed changes to do the exact opposite and put not only those trades in Jeopardy of safe working conditions but will have a cascading unsafe effects for all other trades involved at the construction projects that involve the proposed shortchanged apprenticeship process trades. Please take all steps to ensure that the working place is part of Making America Great Again by ensuring that all Patriotic Alaskans in the trades have proper ,documented apprenticeship programs.

From: [Sean Colette](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and jobs - Say No To Proposed Regulations!
Date: Monday, January 13, 2020 1:27:50 PM

From: [sean.juan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 3:09:39 PM

From: [Seanna Hines](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 2, 2020 4:22:01 PM

From: Sen. Click Bishop
To: [Ledbetter, Tamika L \(DOL\)](#)
Cc: [Cunningham, Suzanne L \(GOV\)](#); [Munoz, Cathy N \(DOL\)](#); [Weimer, Rebecca E \(DOL\)](#); [DOL LSS Regulations \(DOL sponsored\)](#); [Sen. John Coghill](#); [Sen. Cathy Giessel](#); [Sen. Bert Stedman](#); [Sen. Gary Stevens](#); [Sen. Natasha Von Imhof](#); [Clark, Christopher G \(LEG\)](#)
Subject: Proposed student trainee certificate of fitness regulations
Date: Wednesday, January 15, 2020 11:15:23 AM
Attachments: [Alaska Senate letter on proposed trainee regulations. 9 January 2020.pdf](#)

Dear Commissioner Ledbetter:

Attached please a letter from six members of the Alaska State Senate: Senators John Coghill, Cathy Giessel, Bert Stedman, Gary Stevens, Natasha von Imhof, and myself.

We have concerns about the creation of a new student trainee certificate of fitness program that was part of a December 4, 2019, proposal by the Alaska Department of Labor and Workforce Development to change regulations in Title 8 of the Alaska Administrative Code relating to the uniform plumbing code, the safety code for elevators and escalators, the boiler and pressure vessel code, and API pressure relief testing valve standards.

The possibility of having a new student trainee certificate of fitness program has generated a myriad of questions from our constituents as well as mechanical and electrical contractors, both union and non-union, as to what this plan is trying to accomplish.

We respectfully request that the department break its December 4, 2019, proposal into two regulatory packages: one dealing with code changes and the other focused solely on a standalone student trainee certificate of fitness program. We ask that your agency then start a new, 30-day comment period on the latter.

We also encourage the department to hold stakeholder meetings and educate legislators and the public about the proposed trainee program.

Finally, we urge you to present this proposal to the Alaska Workforce Investment Board and ask that panel to weigh in on it.

Thank you.

Senator Click Bishop
1292 Sadler Way, Suite 308
Fairbanks, Alaska 99701

(907) 456-8161

From: [serena september green](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Opposition to Proposed Regulations
Date: Monday, January 13, 2020 10:06:02 AM

I'm writing to express my opposition to the proposed regulations which would remove apprenticeship from electrical and plumbing trainee licenses, drastically change the apprentice/journeyman ratio, and severely alter how certain tradesmen would get a license.

These regulations impact trades that are highly dangerous and deadly, these regulations would make those jobs even more dangerous. Under the regulations, training program is not required for someone working on residential, commercial, or industrial construction for some very hazardous fields. They also create fully licensed electricians, linemen and plumbers with no skill or knowledge in their field. And oddly, they go against industry standards for journeyman to apprentice ratios. This is very scary and not in the best interest of our state. I strongly oppose these regulations.

-Serena Green
Alaska Resident for 30+ years

From: [Sergio Acuna](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: opposing regulations against apprenticeship programs standards
Date: Thursday, January 2, 2020 10:55:50 AM

Dear Commissioner Ledbetter,

I am writing to oppose DOL's proposed anti-apprenticeship regulations. Eliminating apprenticeship standards, and allowing journey worker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death. These regulations undercut our longstanding, privately-funded training programs supported by contractors and construction workers. Your proposed regulations would also reduce career opportunities for transitioning service members. Please withdraw these proposed regulations.

Thank you for your work to defend apprenticeship, our jobs, workplace safety, and job opportunities for our veterans.

Sergio F. Acuña

Business Representative

Laborers' Local 341

2501 Commercial Dr.

Anchorage, AK 99501

Ph. 907-341-0341

Fax. 907-341-0342

From: [seth hurd](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 5:52:53 PM

My name is Seth Hurd. I am a journeyman wireman and a member of the IBEW local 1547 in Alaska. I graduated from the apprenticeship program in December of 2017 and have been staying busy in the trade since then.

I am writing this email in regards to the newly proposed regulations that would eliminate the need for an apprenticeship program for those who want to become a licensed electrician in the state of Alaska. I understand the above mentioned regulations would also include changes to the amount of trainees that a journeyman can oversee. The list of proposed changes goes on, however my concerns rest on these two issues.

Having worked in the field for over 7 years both as an apprentice and a journeyman, I can say with confidence that the current standard of training is not only sufficient, for lack of a better term, but also essential. By eliminating the need for an apprenticeship program, anyone seeking employment in the electrical field will immediately suffer two consequences: lack of knowledge in how to produce quality work and, more upsettingly, a poorer understanding in how to work safely.

Electrical work is inherently dangerous, not only for the workers themselves, but for the customers who depend on our work. When a worker must put his hands in an energized panel, he needs to know what he can and cannot touch. One slip of a finger or one drop of a screw can take a life very quickly. In my experience, the best way to learn how to safely work in our trade is by working with an experienced journeyman one on one. By taking away our apprenticeship program, this will be lost and the safety of our workers will be dangerously jeopardized.

As a journeyman who has had his fair share of apprentices to look after, the best way to train someone in a trade that is as dangerous as ours is by working with them hand in hand. By adding just even one more apprentice to the ratio currently allowed, I can say without a doubt that safety would go down the drain in a hurry. It is very difficult to constantly look over the shoulder of someone who doesn't know what they're doing in a setting that is unforgiving in regards to safety. Pushing the number of apprentices up to ten per journeyman is absolutely ridiculous and will without fail result in injuries or deaths. It is impossible to look after so many trainees.

My biggest concern is safety for the workers and these proposed changes laugh in the face of safety. I implore anyone to whom this message concerns to vote against these changes as they will destroy safety in the workplace and place a burden onto anyone's shoulders who this work effects.

Seth

From: [Shanah Stone](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Draft apprenticeship regulations
Date: Friday, January 3, 2020 3:04:17 PM

I submit the following:

These regulations would --

Remove apprenticeship from electrical and plumbing trainee licenses. In fact, no training program would be required for someone working on residential, commercial, or industrial construction in these hazardous fields.

Create fully licensed electricians, linemen and plumbers with no skill or knowledge in their field. By removing the training requirement, a worker could spend their time as a trainee performing any task at all, and after 12,000 hours receive a full journeyman license. Whether it was sweeping up after the electrical workers, taking out the trash, or performing a single simple task over and over, the worker would qualify for a full license.

Create a new "student trainee" license that would allow 10 trainees to every journey worker in these highly hazardous professions. The current apprenticeship standard of 1 to 1 ensures proper training and supervision, as well as public safety through ensuring skilled installations.

These new regulations erode public trust. The public has to trust that the work that has been done behind the walls of their homes and the buildings they work in was done using the highest standards with the best trained individuals who are well versed in public safety codes. If these regulations are put in place, untrained people will build critical electrical and plumbing installations.

Allowing untrained, untested individuals to work on complex infrastructure heightens the risks of electrocution hazards, building fires due to faulty electrical or gas installations, sanitation issues (drinking water contamination, mold, etc.), and carbon monoxide and methane leaks.

PUTS WORKERS, THEIR RIGOROUS TRAINING, AND THEIR FUTURE ON THE LINE

By removing the requirement that trainees participate in a registered apprenticeship program, our workforce is being cast aside. Registered apprenticeship ensures that a person receives well-rounded training to nationally recognized standards, and that there is a clear path to become a skilled journey level worker.

Increasing the number of hours required to become a journeyman for those trainees who aren't in apprenticeships will discourage Alaskans from working their way up in their field. 12,000 hours is six full years of full-time work, and by removing the requirement to provide a comprehensive training experience, this could be spent learning anything or nothing at all.

Allowing a 10 trainee to 1 journeyman ratio for student trainees will create a clearly hazardous environment. Commercial, industrial, and residential construction workers experience injuries and fatalities at a rate far above the national average. This is why apprenticeships allow a maximum of one trainee to each journeyman. Increasing that number to 10 trainees per journeyman is an unthinkable move that will result in injuries and deaths for young, inexperienced workers.

Hurt our future workforce by creating a perpetual class of low-paid "trainees". Without apprenticeship, unscrupulous companies will use the trainee license as a way to hire cheap, low-wage, and out-of-state labor to do the work with no commitment to training them to be journey level workers. Worse, by increasing the number of hours from 8,000 to 12,000, the department is ensuring that these low wage workers will never see the opportunity to advance.

From: [Shane Bennett](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Wednesday, January 8, 2020 6:38:45 PM

From: [Shane Bennett](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Apprentice Standards
Date: Wednesday, January 8, 2020 6:32:29 PM

I full heartedly oppose any restriction on apprenticeship standards. A lowering of standards is not the path for well trained exceptional blue collar workers and an elimination of standards, in my opinion, should be against the law! Educated and trained persons through apprenticeship's is the only way to keep America with a competitive, professional and superior working class, which is the Future of this Country...100%.

I oppose any reduction in Apprenticeship Standards, it's vital to all blue and white collar American's.

Shane Bennett
Plumbers & Pipefitters Local 375. Fairbanks Alaska 99701
Sent from my iPhone

From: [Shawn Williams](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 12:24:50 PM

To whom it may concern,

My name is Shawn Williams and I have been the city Plumbing and Mechanical inspector in Juneau Alaska for 10 years. I am writing to express my concerns with eliminating the current apprenticeship requirements. I have seen first hand thousands of installations that do not meet code and are hazardous to the health and safety to our fellow Alaskans. Almost all of these violations come from unqualified people that should not be doing plumbing, mechanical, or electrical work. It would be a great disservice to all Alaskans to eliminate the current requirements for proper training.

Shawn T. Williams | Building Inspector

[Community Development Department](#) | City & Borough of Juneau, AK

Location: 230 S. Franklin Street, 4th Floor Marine View Building

Office: 907.586.0772



From: [Sheila McDonough](#)
To: [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Governors plan guts safety
Date: Friday, January 10, 2020 1:30:47 PM

Keep apprenticing alive in Alaska and safety at the forefront. Oppose the governors plan to change title 8.

Sent from the i-road

From: [shelly fraley](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Saturday, January 4, 2020 9:29:52 AM

January 4, 2020

Dear Commissioner Ledbetter and whom it may concern,

Please take seriously the need for thorough and proper skills and safety training not only for the good of the public, infrastructure, and economy but for the health and safety of our workers. Please do not support the drafted changes to Alaska's apprenticeship training and veteran career opportunities.

I, along with several other family members are currently and have worked in the electrical trades and know that even with the best of training, incidents can still happen.

Please require that our sons and daughters be given to utmost quality in skills and safety training available. Please don't put them at more risk because the benefits will not outweigh the outcome and their health and safety is paramount.

Along this same vein, our veterans have earned a place in the front of the line when it comes to opportunities in civilian life. They have stood on the frontlines for us and should not be now placed in harms way from inadequate safety and skills training.

I ask you, would you yourself rather have someone working on your job who could cause harm or be harmed due to poor training. Imagine if that were your son, daughter, husband, wife or grandchild.

I am the mother of three sons. One of them is soon to be a veteran, another has gone through a power lineman apprenticeship and is a journeyman. I know they have been in dangerous situations at work and strongly believe that because of the training, support of their peers and oversight of their leadership and foremen, my sons have remained healthy and successful. They have come home to their families whole. Because of their training, they have the ability to recognize potentially dangerous situation and have the confidence to stand down when there are unsafe conditions and help solve problems that may arise. I have also seen first hand, after the fact, that one of my sons, without proper training and oversight was easily take advantage of by his employer. His lack of knowledge and experience placed them him in a very dangerous work environment. I'm thankful he survived it.

Please don't allow the trades to go backwards. Please don't create a problem when the trade apprenticeship programs are working very well. Please open up opportunities for our veterans instead of placing them back into harms way.

Please do not support the changes Gov. Dunleavy is drafting for Alaska worker training and veterans career opportunities.

Sincerely,

Shelly Fraley
PO Box 15281
Fritz Creek AK 99603
(907)299-1557

Sent from my iPhone

From: [Shinesobright Ithurts](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#); [Tim Estes](#)
Subject: apprentice regulations
Date: Friday, January 10, 2020 4:31:24 PM

I am very much opposed to the changes proposed to apprentice regulations. I have been a journeyman wireman for over 11 years now, after completing my apprenticeship, Having qualified electricians in the construction field is important for safety and craftsmanship. We want to have a safe workplace where everyone comes home everyday and electricity is very dangerous stuff. In a strong economy and a great country we should not be willing to accept third world nation status, which would be what it will be like to have shoddy workmanship and electrical systems that don't work consistently.

Tim Estes
electrician

PO Box 277
Ester, Alaska
99725
907-699-8080

From: shufler
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Wednesday, January 15, 2020 11:15:35 AM

From: [Simon J](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Sunday, January 12, 2020 11:02:00 AM

Good Morning,

I have Been in the Electrical trade for 35 years and have been a Journeyman Power Lineman for 30 years.

I can tell you without hesitation that this new regulation is very bad for the industry as well as the well being of the general public.

When you try to change the regulations from a safer environment to one that reduces the level of safety for the workers then you are setting a bad precedent.

The testing by the State of Alaska that we currently have is in place for a reason and that is to insure that the trainee is fully versed and trained in all aspects of the hazards they will face on the road ahead.

My training took 8000 hours to complete and when completed I knew that I was trained properly and that my training was in the best interest of the industry.

It also ensures that the public will know that the work being done is done with the best and safest workers available, and that the work is being done to match or exceed the standards for construction, housing and building safety.

The electrical and plumbing industry are complicated and hazardous to begin with, let's not make it worse by sending untrained workers out that will in the end be severely injured and or killed as a result of this ridiculous proposal

Please do not continue with the change it is bad for you and your family and will reverse what we have worked for all these years.

Safe well trained people to do the job Right the first time.

Thank You,
Simon T Josefsen

From: [Stephanie and Kalen Meek](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Public Comments in regard to proposed changes to Title 8
Date: Monday, January 13, 2020 3:41:35 PM

I am writing out of a deep sense of urgency to request that the proposed changes to Title 8 be withdrawn. Proposing to eliminate apprenticeship requirements for electrical and pipefitter occupations and altering the journeyman/trainee ratios on the job site would put my husband's life in immediate danger.

What the Governor is proposing will, without a doubt, endanger my husband's life. He is the father of three young boys. He works harder than anyone I know at perfecting his craft and in ensuring the safety of everyone he is working with. He has been a journeyman wireman for 11 years and in the IBEW for nearly 16 years. He completed the apprenticeship and has gone on to train many young electricians. This program is designed the way it is to ensure that everyone is skillfully trained and above all else, SAFE. Everyday my husband comes home in one piece from work is another day my prayers are answered. What he does for a living comes at great risk to his own personal safety and any changes in regulations/policies that would jeopardize his safety are nonnegotiable. My children need their father and I need my husband.

These regulations significantly increase the risk of on-the-job deaths and serious injuries on a wide range of projects. There is a reason the ratios are set the way they are and that their apprenticeship training program is as rigorous as it is. When you mess up in this profession, you die. It's that simple.

Additionally, from an economic standpoint, eliminating apprenticeship standards creates regulatory chaos and undermines a stable business environment. Gutting apprenticeship for these crafts harms the many veterans who are working to enter the trades through programs like Veterans in Piping and Veterans in the Electrical Trades, it undermines the young high school students looking for a college alternative by going to a trade school and joining a trade, and it jeopardizes the integrity of the trades as a whole by allowing untrained people to build critical electrical and plumbing installations - which in turn puts the public at risk.

Again, I vehemently urge you to dismiss these proposed changes. Please do not put my husband's life at risk, please do not undermine his profession and decades of training with unsafe and unsound changes to a program and industry that is working exceptionally well for those employed in it. These trade unions offer the community the best of the best in skilled labor. They do their jobs safely and professionally. They are contributing members to their communities, pay taxes, and raise their families here. Please do not encourage and support changes that jeopardize, not only their professional wellbeing, but their very lives.

Thank you for your consideration,

Stephanie Meek

From: [steve neale](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:06:05 PM

From: [Steve Wisdorf](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Saturday, January 4, 2020 12:45:03 PM

To Whom it may concern

The new regulations proposed for the state of AK licensed professionals is a major mistake. As a contractor and electrical administrator, I often am called out to fix and repair low quality and dangerous work done by unqualified personal. By creating a un disciplined structure it will create an unsafe work environment where unqualified personal will be unknowingly putting themselves at a harms risk

I personally have gone through an apprenticeship program and know the pitfall of not going through one. I received training and oversite that only can be taught through direct oversite by a Journey Electrician.

Running a business I can see how having a 10 to 1 ratio a danger to the workforce and you could not provide a safe installation. There is too many code violation and danger installations that would cause harm to people and property

This is also in opposition of what the Federal administration is trying to accomplish with increased apprenticeship programs.

I am TOTALLY Opposed to these new regulations

swisdorf@wiredak.com

Steve Wisdorf

Wired AK LLC

P.907.562.2444

F.907.562.2488

C.907.884.1142

From: [Steven Grimes](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Public Comment
Date: Tuesday, January 7, 2020 6:15:14 PM

From: [Steven Horwatt](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 9:32:29 AM

Good Morning,

My name is Steve Horwatt and I am a licensed Journeyman lineman that completed my apprenticeship in December of 2000. I am writing to voice my concerns about the proposed legislation to do away with the requirements to become a licensed Lineman or electrician. Line work is a very hazardous industry that requires intensive training to be a competent person. Even with the great training offered through apprenticeships, horrific accidents seem to happen every year. These accidents are life changing and sometimes life ending to our brothers and sisters in the field. The proposed changes will greatly increase the risk of accidents and it is my belief that they will dramatically increase after the new regulations take affect. As a workman in the line field over the past 20 years I have seen many developments to increase the safety of our workers, from fall protection, osha 10 training just to list a couple. It seems to me that these regulations will pull us backwards and negate the advances in safety in the passed decades. Knowledge and training gained in a 1 on 1 journeyman to apprentice atmosphere allows for the passing on of critical understanding. Simply, a child in a classroom with a lower teacher to student ratio will learn much more than a student in an over crowded classroom. You always hear that a life is priceless, but the proposed changes speaks volumes about the power of a buck. I strongly suggest that the regulations and the state license requirements stay as they are! If it isn't broken then don't fix it.

Sincerely,
Steve Horwatt
907 240-0722

Sent from [Mail](#) for Windows 10

From: [Steven Peters](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Thursday, January 9, 2020 3:47:39 PM

From: [Support](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Laura Bonner](#)
Subject: Reject all changes to COF regulations
Date: Thursday, January 9, 2020 10:36:44 PM

Alaska Department of Labor and Workforce Development
Division of Labor Standards and Safety
Becky Weimer, Regulation Specialist II

Re: proposed regulation changes notice dated December 9, 2019

The State of Alaska should always adopt into Alaska's code the most current national code of the Uniform Plumbing Code, the Safety Code for Elevators and Escalators, the National Electrical Code, the National Electrical Safety Code and other national codes for the safety of the workers and the public. Licenses known as Certificate of Fitness issued by the State of Alaska are required for plumbers, electricians, power linemen and apprentices for these trades to make sure there is a minimum level of competency of the licensee.

However, the proposed language dilutes the licensing requirements for journeymen and apprentices. Some sections propose an employer's statement that the applicant has 12,000 hours of work experience, but with no training/apprenticeship requirements attached, is documentation enough for the state to issue a license. There is no requirement that the applicant has worked any of these hours under the supervision and direction of a licensed journeyman in that specific trade or what type of work was performed. Is that license applicant competent?

For those learning the electrical and plumbing/pipefitting trades, the only requirement to get a trainee certificate is to pay the department's fee because the proposed change removes the requirement for a trainee to be in an apprenticeship program. There would be no documentation of what type of work was learned and what skills were acquired. Apprentices and trainees must be taught safe work practices as well as the requirements of the national and state codes.

Adding a 'student trainee certificate' provision that allows one journeyman to supervise 10 student trainees on a job site is really problematic. That ratio may be acceptable in a classroom or lab setting but never at the job site! It would be impossible to teach the trainee how to do the work, make sure it is done correctly, why the code is pertinent to the work being performed, and how to safely work on a crowded construction site. The work can be dangerous and needs to be closely supervised. Too many apprentices and trainees have been hurt, died or caused injuries to others.

These occupations can be very dangerous. Apprenticeship programs established by Alaskan contractors and craftsmen have successfully provided a well-trained workforce in these occupations for decades. These apprenticeship programs require documentation that each apprentice is trained in all aspects of the trade. If the proposed regulations regarding COFs are adopted, there will be more worker injuries and deaths. Mediocre training and licensing requirements can also result in catastrophic equipment failures in buildings and electrical infrastructure systems putting the public's safety at risk. It can also be costly to homeowners who have plumbing problems, defective electrical wiring, fires or carbon monoxide issues due

improper installations.

Current licensing regulations for journeymen and apprentices must be maintained.

Operation of heavy equipment should remain a part of a certificate of fitness. It is even more important in remote areas of our state where inspections are few and far between that the standards are kept high for these trades. Update Alaska's Code but reject any proposed changes to licensing.

Laura Bonner
Anchorage, AK
907-242-4875

From: [susan miller](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Tuesday, January 7, 2020 6:29:40 AM

Mr Dunleavy,

Do not implement a New regulation that allows unskilled workers to work on job sites. It will cost more money in the long run and delay completion of jobs!!

Keep the journeyman training for safety and accuracy in completion of jobs timely.

Thank you,

Susan Miller

907-414-7158

Sent from my iPhone

From: [Swanee Swain](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Opposition to propose DOL regulations for apprenticeship
Date: Friday, January 10, 2020 11:56:58 AM

I'm 61 years old and have lived and worked in Alaska since 1969.

My main concern about these proposed regulations, is SAFETY!!

And it's based on 40 years of experience working in and around The industries and classifications that will be directly affected.

I'll just pick one issue of the regulations to speak too, Although I oppose the whole package and truly believe this is just a buddy deal for outside contractors to come up, bring cheap labor, and underbid the contractors that are already up here.

Issue number one:

The ratio of 1 journeyman to one apprentice has been in place for years and it's there for safety reasons. I'd like to know what's happened in the recent future that's changed all of a sudden and made it safe for one journeyman to supervise up to 10 Apprentice!

That's just not smart.

Please... Please do not sign this proposal into regulation!

Respectfully,
Swanee Swain
Eagle River Alaska

Sent from my iPhone

From: [Terry McGahan](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 6, 2020 5:40:47 PM

From: [Thayne Hacking](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Tuesday, January 7, 2020 12:49:32 PM

My name is Thayne Hacking. I am a journeyman lineman in the state of Alaska and have been for 16 yrs. I attended a 8000 hour apprenticeship program with a 1 to 1 ratio apprentice to journeyman. During the four years I served as an apprentice I believe I received great training. Wanting to reduce the ratio of jry to apprentice is a bad decision. There is hardly enough time to absorb all the information given to you in a 1 to 1 ratio let alone in a 10 to 1 ratio. These trades are a safety sensitive positions and this legislation will greatly affect the safety of individuals working these jobs. I don't believe we should sacrifice the safety of individuals for the benefit of company's.

Sincerely,

Thayne Hacking

Ak voter Id # 06461761

Sent from my iPhone

From: [The Obremski's](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Oppose Changes to Title 8 Regs
Date: Friday, January 10, 2020 2:17:22 PM

- > I am writing to express my staunch opposition to the proposed regulation changes in Title 8 affecting the plumbing and electrical skilled trades.
- >
- > I have completed a registered apprenticeship and can vouch for the strict standards and training regimen that create the most qualified worker able to perform work in the safest manner.
- >
- > These proposed changes are a risk to worker safety and ultimately public safety. What journeyman can effectively instruct 10 "trainees" while performing safety-sensitive work in the safest manner?
- >
- > Apprenticeship programs established by Alaskan contractors and craftsmen have successfully provided a well-trained workforce in these occupations for decades. If we jeopardize the quality of training, we jeopardize Alaska.
- >
- > The plumbing and electrical trades can be very dangerous and current licensing regulations for journeymen and apprentices must be maintained.
- >
- > Thank you,
- > Marcie Obremski
- >

From: [Theodore Swanson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Changes to Title 8 of AAC
Date: Wednesday, December 18, 2019 1:36:29 PM

To Whom It May Concern,

I am the product of the I.B.E.W. 1547 Apprenticeship. To me, the apprenticeship represents a comprehensive education for a highly skilled trade.

The proposed changes to Title 8 of the Alaska Administrative Code would undermine the apprenticeship programs already equally available to all who are qualified to learn and do the work of the trades affected. It would also stretch, to the limit, any competent Journey-worker's ability to work effectively and "directly supervise" those assigned to work under him/her.

Any removal of a requirement that a worker shall be registered in an approved apprenticeship would drastically alter the quality of work being done in the state of Alaska for the worse. These changes would ensure the cost of public and private projects rise as a result of gross incompetence by an unqualified workforce, disguised as a ploy to "lower costs" for employers.

When the ratio of unqualified "trainees" to qualified Journey-workers is ever more than 1:1 the resulting work being done is not going to be able to hold a candle to the work that a qualified apprentice and his or her qualified Journey-worker would be able to accomplish.

The establishment of a "student trainee" directly undermines those who enter an accredited apprenticeship program like the I.B.E.W.'s. There is no way that it is physically possible to "directly" supervise 10 unqualified workers. Especially when the work itself is dangerous, sometimes to point of life and death, while working in or around live power panels.

Not to mention, using trainees not enrolled in an apprenticeship allows for the employer to discard the trainee at will when the construction season slows down, at which time the trainee will not have any reliable way to go back to work in the trade, like an apprentice would. This leaves little incentive to train the workforce and would gut the apprenticeship programs in Alaska that already have a proven effectiveness at turning out qualified Journey level Craftsmen.

What studies have been done to back up the need to implement a "student trainee" classification? If none, then why make a change to a system that effectively works?

Do you understand your proposed definition of the term "Direct Supervision"?

Have you ever visited a construction site and witnessed a competent Journey-worker try to do his/her job effectively and "directly supervise" more than one qualified apprentice?

Answering "yes" to the above question would be a lie, and thus "no" would be the only applicable answer, so then how would a well-trained and qualified competent Journey-worker be able to effectively do his/her job while "directly supervising" up to ten unqualified student trainees?

The trades affected by these changes are skilled trades sometimes dealing with very dangerous work, do you think it would be wise to let a doctor supervise up to ten first year medical students each performing their own surgery in different rooms?

Do you think it to be physically possible to "directly supervise" ten unqualified trainees in ten different rooms?

How then is it even remotely feasible to allow an employer to hire ten "student trainees" to every Journey-worker and then expect them to actually "directly supervise" all ten of them according to your definition?

This is just asking for newly constructed buildings to burn to the ground, or flood, or for multiple people to be seriously injured on every job in Alaska's future.

I have never been on a construction site where more than two people from the same trade are working in close enough proximity to be considered able to "directly supervise" one or the other. These trades require some space to do the work required of them in an effective and professional manner.

In defining of "Electrical Wiring" and "Plumbing", what exactly does an ambiguous list of "other construction heavy equipment" entail?

What is the purpose of eliminating "heavy power equipment" from "electrical code work" and "plumbing code work" other than to attack the work that these licensed trades already do when it pertains to their scope?

In closing, these trades are licensed skilled trades because they are physically dangerous and require skill to do effectively and safely. Letting employers hire students off the street and then allowing them to discard them when work slows down, is a direct attack on the proven and effective apprenticeship programs already established in the state of Alaska.

By adding a new "student trainee" classification to the certificate of fitness for which wages have not been established would undermine the wages of the hard working middle class of Alaska allowing the employers to "cut costs" by bringing in unskilled labor whose intent may or may not be to stick with the trade they work in, and undercutting a Journey-worker's ability to "directly supervise" the work being done under his/her Certificate of Fitness.

This would increase the cost of projects by allowing unprofessional and unskilled labor to take place which increases accidents and increases mistakes made.

These changes are shortsighted at best and reflect the poor planning for Alaska's future by the current government, and more so those in charge of proposing changes to standards of Alaska's Department of Labor.

As a Journeyman Electrician, I refuse to let unskilled labor work under my license and do work in my name. I will not lie about my ability to "directly supervise" ten unskilled student trainees, it's not an ability any Journey-worker possesses. These changes are ridiculous and come from an uneducated viewpoint.

All these changes do is weaken the strength of the people that joined these trades in hopes to

provide a decent living for their families and it drastically cuts the amount of work each one would be doing in a year. Do not implement these proposed changes.

Sincerely,

Theodore Swanson
Journeyman Electrician

From: [thomas moore](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Stop job-killing, harmful regulations
Date: Friday, January 10, 2020 8:02:48 AM

From: [Timothy Mellard](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Regulation change
Date: Friday, January 10, 2020 3:28:41 PM

January 10, 2020
Becky Weimer
Dept of Labor and Workforce Development
Labor Standards and Safety
PO Box 111149
Juneau, AK 99877

My name is Tim Mellard and I strongly oppose the proposed regulation changes to Title 8 of the Alaska Administrative Code in sections AAC 90.140 and AAC 90.300.

AAC 90.140: I oppose eliminating the requirement that a trainee be indentured in an accredited apprenticeship program.

AAC 90.300: I oppose adding this section to approve training programs that are not accredited apprenticeship programs.

Sincerely,
Tim Mellard

Sent from my iPhone

From: [Timothy Willis](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Changed to title 8
Date: Wednesday, January 8, 2020 10:05:40 AM

Hello Department of Labor,

I have just read the changes the Governor is preposing for the skilled trades apprenticeship programs. I'm a retired IBEW electrician... with multiple state electrical licenses... Alaska being one of them.. the training that has be afforded to me during my Apprenticeship has took me to work all over the United States working in Nuclear Plants, car factories, oil fields, schools to power plants and data centers... and the ones I can't think of at this time... the lowering of standards for Skill Trades would be the same as tells doctors that only 2 years of medical school would good, or police and fire fighters would be ok to learn on the job...!!! These changes being proposed are just dumb.... there's a saying that you get what you pay for but when it come to human safety, electrical shock in my case, I want someone's that's has the classroom and on the job training under the guidance of a licensed journeyman that himself has gone thru the same training.... I would not be for lowering the standards the skilled trades. I've seen over the years substandard electrical wiring that was just a matter of time before someone or something bad would happen... if anything raise the standards for becoming a licensed skilled tradesmen... thank you for your time in ready this...

Timothy J Willis

P.O. Box 81702

Fairbanks AK. 99708

Alaska Certificate of Fitness #20060453

Washington State Electrical journeyman # WILLITJ921DO

North Dakota Electrical journeyman #J8870

Michigan Electrical journeyman #6317167

Sent from my iPhone

From: [Todd S](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#); [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Opposition to DOL apprenticeships proposed regulations.
Date: Friday, January 10, 2020 9:53:01 AM

From: [Tom and Linda Alexander](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Fwd: Proposed changes to Title 8--increasing the ratio of trainees or apprentices to Journeyman electricians.
Date: Saturday, January 11, 2020 12:06:37 PM

From: [tom taylor](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Aprentice programs
Date: Monday, December 16, 2019 11:19:36 AM

I would like to take the time to let you know how important good apprenticeship programs are. They are a good way to get into good paying jobs without going through expensive cost prohibitive programs. They allow you to learn a trade hands on and work with knowlegable people that can show new workers the right way to do things and show them how to work safely. The value you walk away with in a union apprenticeship program is invaluable and places you on a successful pathway to life long careers and retirement. I would ask you to strongly support these union apprenticeship programs as the help create lifelong jobs in career fields that are desperately seeking highly qualified workers.

[Sent from Yahoo Mail on Android](#)

From: [Travis Bonnet](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Concerns to Proposed Changes Title 8
Date: Friday, January 10, 2020 12:03:32 PM

Hello,

My name is Travis Bonnet. I am an Alaskan resident for 34 years, and a skilled tradesman for 15 years and I would like to voice my concerns with the proposed changes to Title 8.

There are drawbacks with many of the changes that could potentially be made. I won't go into all of them, but one that stands out is the changes suggested to the apprenticeship requirements.

The current apprenticeship and journeyman requirements which the state regulates, maintains the skill and professionalism in Alaska's skilled trades.

Breaking down the requirements to a higher rate of student trainees to journeyman will be breaking down the higher standard of craftsmanship, safety, and training that Alaska has had for so long. Our states current workforce is superior to the rest of the United States. This will be jeopardised if the proposed changes take place.

From: [Travis Carlson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Wednesday, January 8, 2020 11:39:19 PM

I would like to take a moment of time to express my view on why changing regulations on the training of electricians is a bad idea. After working in this industry for more than 20 years and going through a proper apprenticeship to be a wireman, I have worked in situations where my life, and my partners life is literally on the line. Wearing category 4 arc flash gear working on electrical gear that is capable of ending the lives of people within 30 feet is not something that should be taken lightly. But if these new policies go through, the proper training oversight of apprentices will be a thing of the past and wiremen without proper training and work habits will be in similar situations and could cause the death of someone or themselves. Not to mention, the increased risk of poor work going unnoticed and probably causing an electrical hazard that could kill someone or start a fire killing many people. Could you just imagine, a large essential building catching fire and causing the deaths of many people because of crummy political reasons? I worked on Ted Stevens International Airport Expansion, what if that job was completed with mostly trainees, the liability of it? The reasons go on and on but importantly, if Title 8 changes, I would not encourage future generations to follow in my footsteps as it would be too dangerous to do so as there would be too many hazards built by the untrained and unsupervised.

Please consider the safety of the industry, of the public, and do not make these proposed changes.

Sent from my iPhone

From: [troy.hoffner](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Monday, January 13, 2020 12:02:55 PM

From: [Tyler Desjarlais](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 3, 2020 7:26:32 PM

To whom it may concern.

I voted in every election and influence the minds of the next generation as a special education support specialist and a certified music teacher in south central public schools for 10 years. I respect your role as a legislator to decide the path Alaska must take for fiscal responsibility.

As a citizen voicing my opinion during public comment, I oppose changes to proposed regulations to increase the ratio of journeyman to apprentices from 1:1 to 10:1. Licensed trades have time tested these ratios and they work. Jobs with apprentices who are properly trained give the workforce skills needed to avoid injuries and accidents. Plumbers and electricians built the pipeline and continue to build the infrastructure we use to drive our economy. If we jeopardize the quality of training we jeopardize Alaska. I know the power of low teacher to student ratios because I taught 530 students a year as a certified k-12 music teacher. I also believe in solution approached suggestions.

If you are trying to speed up the rate of apprenticeship programs to meet our needs, consider investing in a training center closer to Alaskas main job market. Also consider cutting costs within the per diem paid to legislators or reducing transportation costs with a legislative session held using fibreoptic cable hi speed internet capable of speeds comparable to major cities that get gigabit internet or better. There needs to be a way to reduce the costs of passing laws and the time frame it take to do so. Shortening the legislative session would solve most of the education related issues due to the freedom schools would have to hire employees during the time where the most candidates are available.

In short, you cant sacrifice quality for quantity. Leave the proposed changes in regulations to something the is broken not tried and true like the apprenticeship regulations currently in place. Imagine trying to fit ten students in a small space to learn a skill that prevents a pipe from exploding. Imagine one of those students distracted and getting the wires mixed up because he couldnt get the attention he needs. I think investment in facilities closer to home will help. Uaa will have some empty buildings after losing 12% of their enrollment so use some of those resources.

Sincerely,

Thx
Tyler Desjarlais
9077267370 cell
3477547192 (8am-4pm m-f) work

Disclaimer:

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From: [Tyler Svedin](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: No anti-apprenticeship regs
Date: Thursday, January 2, 2020 2:19:37 PM

Dear Commissioner Ledbetter,

I am writing to oppose DOL's proposed anti-apprenticeship regulations. Eliminating apprenticeship standards, and allowing journeyworker to trainee ratios of up to 10:1 would create dangerous job site conditions and put construction workers at greater risk of serious injury and death. These regulations undercut our longstanding, privately-funded training programs supported by contractors and construction workers. Your proposed regulations would also reduce career opportunities for transitioning service members. Please withdraw these proposed regulations.

Thank you for your work to defend apprenticeship, our jobs, workplace safety, and job opportunities for our veterans.

From: [Vickie Lam](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Title 8 changes
Date: Friday, December 13, 2019 11:34:50 AM

Please withdraw these proposed regulation changes to Title 8.

From: [Wade Syvrud](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Saturday, January 11, 2020 8:40:21 AM

From: [walter_robinson](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: New Regulations for Electrical Workers
Date: Friday, January 10, 2020 8:56:24 AM
Attachments: [20200110082725892.pdf](#)

From: [Weimer, Rebecca E \(DOL\)](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Date: Monday, January 13, 2020 2:52:24 PM
Importance: High

Becky Weimer
Regulations Specialist II
Labor Standards and Safety
Phone: (907) 465-6002

From: Ann Lindsey <AnnLindseyAK@hotmail.com>
Sent: Monday, January 13, 2020 2:50 PM
To: Weimer, Rebecca E (DOL) <becky.weimer@alaska.gov>
Subject: Concerns - Proposed Regulations - Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler... etc.
Importance: High

Becky Weimer,
Department of Labor and Workforce Development,
Labor Standards and Safety

I am writing out of concern for the following proposed regulations:

REGULATIONS: NOTICE OF PROPOSED CHANGES ON UNIFORM PLUMBING CODE, SAFETY CODE FOR ELEVATORS AND ESCALATORS, BOILER AND PRESSURE VESSEL CODE AND API PRESSURE RELIEF TESTING VALVE STANDARDS IN THE REGULATIONS OF THE DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT

I was made aware of these regulations toward the end of last week and have reached out to many of my fellow professionals who were all unaware of these proposed changes. I have read through what has been provided, and feel that as written, there could be unintended consequences as a result of putting these into effect.

Purpose: With the interest of safety, I highly recommend the state withdraw these proposed regulations to allow an open discussion between the parties involved and to ensure we address items of great concern.

CONCERNS: I did see the state mention that the current apprenticeship regulations, came about in 2006 and has remained unchanged since then - and the comparison to the impact was made to fatalities in the 10 years prior to the 10 years after - which I feel strongly understates the risk, and we should not measure effectiveness of safety qualifications, programs and regulations through fatalities. I believe the electrical field has changed and risk

is greater now than it was in 1996 as well. We've had great break throughs in safety gear for electrical - and with that comes mis-understandings as well, and the need for greater training as the systems worked on have become more complex.

Electrical safety has remained in the OSHA top 10 violations for years. It remains at the top of all the clients I work with as far as being in the 'Critical Life Rules' (along with working from height etc.) - areas where a companies majority of serious incidents lie.

I sit on the board of Government Affairs for the American Society of Safety Engineers - and what I bring to the table, is making sure that when regulations are written, that we protect safety for safety's sake. Some small employers don't employ safety personnel, and there's varying degrees of safety understanding around the industry - many of these entities look to the regulations for guidance. We need to ensure that what is in the regulations we propose is in the best interest of our industries throughout the state, and that we discuss intentions for issuing a rule / revision with those that have to implement them, and with those that are affected by them - so that we minimize unintended consequences.

Thank you for your consideration and opportunity to voice my concerns,

Ann

Ann Lindsey, CSP CIT

Who I am:

30 years experience in the field of Environment, Health, Safety & Project Management
Degree in Hazardous Materials Management
Board Certified Safety Professional
Board Certified Instructional Trainer
Culbertson Award Recipient - Society ASSP highest award - for outstanding volunteer toward furthering safety and the profession
Alaska ASSP Safety Professional of the Year - 2019
Nominated for Society Safety Professional of the Year 2019
Work with clients around the world furthering hazard recognition and common language to streamline operations and minimize risk

What I do:

Current Voluntary Work:

Chair - Alaska Safety Advisory Council
Chair, Alaska Governor's Safety & Health Conference
Co-Chair, Alaska Occupational Safety Summit
Delegate - Alaska American Society of Safety Professionals
ASSP - Government Affairs Council
OSH Industry Advisory Board - UAA

My Work:

President, Lindsey Consulting
Vice President, Decision Point Associates

E-mail: ann@hselindsey.com | Cell: (907)-231-0571

From: [Wendy Hovden](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Protect Alaskans and Jobs - Say No to Proposed Regulations
Date: Friday, January 10, 2020 8:22:40 PM

As an Alaska journeyman electrician, the proposed changes to training and licensing requirements for plumbers and electrical workers are extremely concerning. These changes will create an unsafe work environment for all crafts working in the construction industry. This will create unqualified "journeyman" backed with an Alaska state license, thus diminishing the value of the license. The proposed changes by the Alaska Department of Labor and Work Force Development will have a long term negative effect on public safety and infrastructure reliability. For the safety and economic stability of all Alaskans I sincerely hope the Alaska Department of Labor and Work Force Development will not adopted these changes.

Brent Hovden

From: [William Beltz](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Cc: [Labor, Commissioner \(DOL sponsored\)](#)
Date: Friday, January 10, 2020 3:30:07 PM

I am in opposition to proposed DOL regulations for apprenticeship. This is a dangerous move that will impact all workers in the skilled trades. We need trained people to preform this work.

On Wed, Nov 13, 2019, 3:34 PM William Beltz <billy.beltz56@gmail.com> wrote:

Thank you Lance

On Tue, Nov 12, 2019, 8:47 PM Lance Groundwater <walrus47@mtaonline.net> wrote:

From: "James L. Pathmann"

Life Advice - Look after yourself first

Many of us are between 65 and death, i.e. old. My friend sent me this excellent list for aging . . . and I have to agree it's good advice to follow. The guy who sent this hi-lighted #19.

1. It's time to use the money you saved up. Use it and enjoy it. Don't just keep it for those who may have no notion of the sacrifices you made to get it. Remember there is nothing more dangerous than a son or daughter-in-law with big ideas for your hard-earned capital. Warning: This is also a bad time for investments, even if it seems wonderful or fool-proof. They only bring problems and worries. This is a time for you to enjoy some peace and quiet.

2. Stop worrying about the financial situation of your children and grandchildren, and don't feel bad spending your money on yourself. You've taken care of them for many years, and you've taught them what you could. You gave them an education, food, shelter and support. The responsibility is now theirs to earn their own money.

3. Keep a healthy life, without great physical effort. Do moderate exercise (like walking every day), eat well and get your sleep. It's easy to become sick, and it gets harder to remain healthy. That is why you need to keep yourself in good shape and be aware of your medical and physical needs. Keep in touch with your doctor, do tests even when you're feeling well. Stay informed.

4. Always buy the best, most beautiful items for your significant other. The key goal is to enjoy your money with your partner. One day one of you will miss the other, and the money will not provide any comfort then, enjoy it together

5. Don't stress over the little things. Like paying a little extra on price quotes. You've already overcome so much in your life. You have good memories and bad ones, but the important thing is the present. Don't let the past drag you down and don't let the future frighten you. Feel good in the now. Small issues will soon be forgotten.

6. Regardless of age, always keep love alive. Love your partner, love life, love your family, love your neighbor and remember: "A man is not old as long as he has intelligence and affection."

7. Be proud, both inside and out. Don't stop going to your hair salon or barber, do your nails, go to the dermatologist and the dentist, keep your perfumes and creams well stocked. When you are well-maintained on the outside, it seeps in, making you feel proud and strong.

8. Don't lose sight of fashion trends for your age, but keep your own sense of style. There's nothing worse than an older person trying to wear the current fashion among youngsters. You've developed your own sense of what looks good on you – keep it and be proud of it. It's part of who you are.

9. ALWAYS stay up-to-date. Read newspapers, watch the news. Go online and read what people are saying. Make sure you have an

active email account and try to use some of those social networks. You'll be surprised what old friends you'll meet. Keeping in touch with what is going on and with the people you know is important at any age.

10. Respect the younger generation and their opinions. They may not have the same ideals as you, but they are the future, and will take the world in their direction. Give advice, not criticism, and try to remind them that yesterday's wisdom still applies today.

11. Never use the phrase: "In my time." Your time is now. As long as you're alive, you are part of this time. You may have been younger, but you are still you now, having fun and enjoying life.

12. Some people embrace their golden years, while others become bitter and surly. Life is too short to waste your days on the latter. Spend your time with positive, cheerful people, it'll rub off on you and your days will seem that much better. Spending your time with bitter people will make you older and harder to be around.

13. Do not surrender to the temptation of living with your children or grandchildren (if you have a financial choice, that is). Sure, being surrounded by family sounds great, but we all need our privacy. They need theirs and you need yours. If you've lost your partner (our deepest condolences), then find a person to move in with you and help out. Even then, do so only if you feel you really need the help or do not want to live alone.

14. Don't abandon your hobbies. If you don't have any, make new ones. You can travel, hike, cook, read, dance. You can adopt a cat or a dog, grow a garden, play cards, checkers, chess, dominoes, golf. You can paint, volunteer or just collect certain items. Find something you like and spend some real time having fun with it.

15. Even if you don't feel like it, try to accept invitations. Baptisms, graduations, birthdays, weddings, conferences. Try to go. Get out of the

house, meet people you haven't seen in a while, experience something new (or something old). But don't get upset when you're not invited. Some events are limited by resources, and not everyone can be hosted. The important thing is to leave the house from time to time. Go to museums, go walk through a field. Get out there.

16. Be a conversationalist. Talk less and listen more. Some people go on and on about the past, not caring if their listeners are really interested. That's a great way of reducing their desire to speak with you. Listen first and answer questions, but don't go off into long stories unless asked to. Speak in courteous tones and try not to complain or criticize too much unless you really need to. Try to accept situations as they are. Everyone is going through the same things, and people have a low tolerance for hearing complaints. Always find some good things to say as well.

17. Pain and discomfort go hand in hand with getting older. Try not to dwell on them but accept them as a part of the cycle of life we're all going through. Try to minimize them in your mind. They are not who you are, they are something that life added to you. If they become your entire focus, you lose sight of the person you used to be.

18. If you've been offended by someone – forgive them. If you've offended someone - apologize. Don't drag around resentment with you. It only serves to make you sad and bitter. It doesn't matter who was right. Someone once said: "Holding a grudge is like taking poison and expecting the other person to die." Don't take that poison. Forgive, forget and move on with your life.

19. If you have a strong belief, savor it. But don't waste your time trying to convince others. They will make their own choices no matter what you tell them, and it will only bring you frustration. Live your faith and set an example. Live true to your beliefs and let that memory

sway them.

20. Laugh. Laugh A LOT. Laugh at everything. Remember, you are one of the lucky ones. You managed to have a life, a long one. Many never get to this age, never get to experience a full life. But you did. So what's not to laugh about? Find the humor in your situation.

21. Take no notice of what others say about you and even less notice of what they might be thinking. They'll do it anyway, and you should have pride in yourself and what you've achieved. Let them talk and don't worry. They have no idea about your history, your memories and the life you've lived so far. There's still much to be written, so get busy writing and don't waste time thinking about what others might think. Now is the time to be at rest, at peace and as happy as you can be!

REMEMBER: "Life is too short to drink bad wine and warm beer."

from my Samsung Galaxy smartphone.

From: wleder@acsalaska.net
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed regulation changes - 8 AAC 90.300
Date: Friday, January 10, 2020 3:07:57 PM

Alaska Dept. of Labor, Commissioner,

I strongly oppose the proposed changes to the Department of Labor Regulations 8 AAC 90.300. I am a retired inside journeyman electrician with 40 years experience in the electrical industry.

To increase the ratio of 1 journeyman electrician to supervising 10 trainees is unthinkable in the realm of safety for workers, customers, and installations. Alaska has always had a high standard of quality and safety when it comes to the electrical industry in the state. That proposal would be devastating to that standard.

Along with substandard safety conditions on construction jobs as well as maintenance contracts, the State of Alaska would see the effects for many years to come as electrical inspectors find sub-standard work on industrial, commercial, and residential buildings.

I understand that Governor Dunleavy's goal is to move the state towards an affordable budget, and I agree with that. However, I do NOT agree with compromising the safety of workers as well as occupants of buildings constructed by untrained electricians.

These proposed changes benefit no one with the exception the profit margin of businesses. .

I strongly oppose the changes.

Respectfully,
Jean I. Leder

From: wleder@acsalaska.net
To: [DOL LSS Regulations \(DOL sponsored\)](#); [Labor, Commissioner \(DOL sponsored\)](#)
Subject: Proposed regulation changes 8 AAC 90.300
Date: Friday, January 10, 2020 2:11:41 PM

Alaska department of Labor and the Commissioner,

I am writing in strong opposition to the proposed changes to the Department of Labor regulations 8 AAC 90.300.

This proposed change is an outrage. To have one Journeyperson supervise 10 trainees is unworkable.

Lost will be quality, safety and training. How is a person going to learn a trade with only 48 minutes of supervision in an 8 hour day. That is what the effect of this regulation will do. One person watching over 10 trainees allows only 48 minutes for each trainee per day of direct training.

This proposed change is obviously coming from special interest businesses who have no regard for the quality of the work and the safety of the worker and the public who will have to live with the results.

I went against the recommendation of my union and voted for Gov Dunleavy. I can see now that I was a fool. The good of Alaskan workers is obviously not a concern with this administration, judging by the text of these proposed regulation changes. Big business wins again!

Thanks, but no thanks!

Wayde Leder

From: [zachary mcgee](#)
To: [DOL LSS Regulations \(DOL sponsored\)](#)
Subject: Proposed Apprenticeship Changes
Date: Monday, January 13, 2020 2:51:42 PM

To whom it may concern:

The proposed changes to apprenticeship programs in the state in my opinion would be detrimental to the development of skilled workers in our state. The safety aspect of the changes is especially worrisome. Ratios are very important in apprenticeship programs, especially so in the electrical trades. It can be extremely difficult to supervise a group of individuals, diluting the ratio to the extremes suggested could potentially expose workers and the general public to unnecessarily hazardous conditions. Removing state testing requirements will dissolve the ability of the state to recognize and promote safe work practices and qualified laborers. Please do not make these proposed changes to our state's labor force, keep qualified workers in Alaska.

Zachary McGee
907-385-6511

From: Alaska Online Public Notices <noreply@state.ak.us>
Sent: Monday, January 13, 2020 9:34 AM
To: DOL LSS Regulations (DOL sponsored)
Subject: New Comment on Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce De...

A new comment has been submitted on the public notice [Notice of Proposed Changes on Uniform Plumbing Code, Safety Code for Elevators and Escalators, Boiler and Pressure Vessel Code and API Pressure Relief Testing Valve Standards in the Regulations of the Department of Labor and Workforce Development.](#)

Submitted:

1/13/2020 9:34:14 AM

Dave House
dhouse@ravenelectric.com

Anchorage, AK, US
Anonymous User

Comment:

I highly suggest that the program does not go away. As a business owner I have seen a mixture of different types of people with alot of hours under their belt and have only preformed minor task in the electrical field. If anything i would suggest we provide more hands on training. We use to have a school that we had classes weekly for each level of apprenticeship. It was a very good thing to give them hands on. I do believe we should change the ratio to 2:1 but feel that the program still needs to be in place for the fundamentals and general knowledge. It also helps to put people in a mind set for what they want to do for their career.

We need to influence the younger generations to learn and be involved in our construction.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Peter McKay <mckayped@yahoo.com>
Sent: Friday, January 10, 2020 2:49 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Public Comments on Dept of Labor Licensing

I do not favor the Department of Labor's proposed changes to Journeyman licensing in the trades. Alaskan electrical and plumbing apprentice programs have produced skilled trades-persons. The system isn't broke. Please don't try and fix it.

Respectfully,
Peter McKay

AK Electrical Journeyman Electrician
AK Electrical Administrator

From: Ingrid Gavalya <ericgavalya@gmail.com>
Sent: Friday, January 10, 2020 1:57 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Proposal for trainee license

To whom it may concern,

I am emailing about the proposal for issuing trainee/student trainee license working in the electrical and plumbing construction and maintenance field. I am a journeyman lineman since 2010 and have worked as an apprentice electrician before changing to lineman earning over 5,000 hours as an electrician apprentice. I and everyone I have talked to so far is apposed to this change in regulation, mainly and most importantly because of safety. In the current safety environment we have this would be a huge step backwards to creating safe and competent workforce because it would be taking out a key element of training and that would be a federally recognized apprenticeship program. These standards should not be compromised for there are accountability for experiences and safety built in to these programs. Having gone through the electrician ABC apprenticeship program and through the IBEW lineman apprenticeship program, I can appreciate this aspect of apprenticeships. The 10/1 ratio from instructor to trainee or apprentice is a huge concern from not only me but from every journeyman I've talked to, union or non-union. These kinds of ratios should only be delegated to classrooms only and should never enter an actual job in the field. There are reasons why ratios are where they are now and that is first and foremost because of safety. I work for ML&P as a lineman and have worked here since 2009 and we had an incident where there were 3 journeymen to 1 apprentice and the apprentice accidentally energized a cable that nearly killed the journeyman working on the cable. That was 3 journeyman to 1 apprentice, and in that situation there was not a lack of supervision, he was told not to touch the cable and told why. This new ratio would be a dangerous step backwards. The certification of 12,000 hours is a deep concern also. This does not benefit an employer or the worker that logs 12,000 hours and gets it certified, then takes a journeyman test. You can learn to be a good test taker but you cannot substitute a well rounded apprenticeship. An apprenticeship program monitors what experience the apprentice receives and if he or she is doing too much of one task, they do not advance until their apprenticeship is rounded out to experience hours that are required. An employer could certify the 12,000 hours not realizing or not taking the time to make sure the apprentice is proficient in all aspects of their trade. Apprenticeship programs demand this and monitor this so there are safe, qualified and proficient workers in the hazardous industry we work in. Although I am an IBEW 1547 member I am not coming to you from a union perspective, I am coming to you from a journeyman lineman that is deeply concerned for the future and safety of our craftsmen and craftswomen. If this change is made it will be a very dangerous decision to the safety of everyone working in the electrical industry and of no benefit to anyone not going through an apprenticeship. This industry is a hazardous industry and any change should be made to make it safer, not less. Shortcuts should never be made to get to journeyman status, if anything it should take more schooling and hours, not easier. I have worked with AVTEC in the past when I first entered the electrician apprenticeship through ABC so I have some experience and knowledge of this subject. Although it is a good program, but if not held to apprenticeship standards, should remain a door to an apprenticeship and not the same status. The standards to get to be a journeyman now should stay as a minimum requirement and no less. Anything less would be detrimental to not only the worker but to the industry and public. Any shortcut to acquiring a journeyman lineman or electrician fitness card would result in injuries and deaths down the road. Please consider my perspective that comes from my experience in the electrical industry. Thank you, Eric Gavalya

Sent from my iPhone

From: Skip Lundstrom <skip1@gci.net>
Sent: Friday, January 10, 2020 1:21 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Proposed change to apprenticeship programs

As a retired IBEW wireman electrician, I am very disturbed at the administrations proposed change to Title 8 which would remove the apprenticeship standards for electricians and plumbers which have been working well for many decades.

Currently, an apprentice learns his or her trade through schooling and a 1 to 1 working relationship with a journeyman. In the proposed changes, the 1 journeyman to 10 trainees ratio will most likely result in trainees working with another trainee...a blind leading the blind environment that cannot result in a qualified worker.

I am proud to have spent my career near the top of the workforce...under the proposed change, an individual may never leave the bottom of the workforce.

I am very much opposed to the proposed change and urge the Commissioner of Labor to trash the concept.

Thank you for your consideration..

Eugene (Skip) Lundstrom
4316 Conifer Ln
Juneau, Alaska 99801

From: Robert Sandstrom <roberts@american-ak.com>
Sent: Friday, January 10, 2020 1:39 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Labor Statute Changes

Attn: Becky Weimer
Dept of Labor and Workforce Development

American Mechanical performs plumbing and mechanical work within the interior of Alaska, this letter is in response to the proposed regulation changes dated December 4th, 2019. These proposed changes make us question the quality of future State licensed apprentices and journeyman. Changing or eliminating any of the current apprenticeship requirements will be detrimental to a well-trained Alaskan workforce.

8 AAC 90.140: We do not support eliminating the requirement that a trainee be indentured into an accredited apprentice plumber program. In our experience, elimination of this requirement weakens the training of the apprentice. Weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

8 AAC 90.300: We do not support adding this section to approve non-accredited apprentice training programs. Again, weakening the training is not in the best interest of Public Safety, the State, or the best interest of the Trainee.

Accredited apprentice training programs are subject to rigorous standards and are subject to review and approval by the Bureau of Apprenticeship and Training. We hope our vast experience and knowledge in this arena would prove invaluable in the State's decision making.

Sincerely
Robert Sandstrom
American Mechanical Inc.

From: April Miranda <april.m.miranda@gmail.com>
Sent: Friday, January 10, 2020 1:35 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Proposed to Title 8 changes

To whom it may concern,
My name is April Miranda and I have been an Alaskan resident for 36 years.
I'd like to voice my concern in regards to the proposed changes to title 8.

I see the proposed changes of breaking down the overall integrity and quality of our states skilled trade labor workforce. Several of my family members have gone through training programs which led to careers in skilled trades. Alaska's current high standards of training requirements have fostered an environment to become competent in necessary hands on skills. Close one to one supervision has promoted a culture of knowledge, excellence in job performance and emphasized the importance of safety. With the proposed student trainee to journeyman increase this critical one on one oversight will significantly be compromised.

These proposed changes may effect the overall professionalism, knowledge, skill level, and safety of our skilled labor workforce.

I'd like to see our state uphold a high level of expectation for training and licensing for skilled labor and all other professions in our state.

Thank you for your consideration,
April Miranda

From: Forrest Roy <forrestmroy@gmail.com>
Sent: Friday, January 10, 2020 3:17 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Opposition of Proposed regulations

To whom it may concern:

I am writing in **staunch** opposition to new regulations proposed by DOL that would **dramatically** scale back worker protections and devalue workers credentials.

The new regulations for the electrical and plumbing trades would devalue hundreds of Alaskan Linemen, Electricians, and Plumbers across the state and would run the risk of negatively impacting our economy. It is **fundamentally** flawed that the department thinks it should *lessen the requirements* for complicated trades such as these. Doing so puts our citizens, military, schools, and families **at serious and dire risk of death or injury**. It is not safe and runs counter to the ideals I thought that the department stood for.

The new regulations regarding apprenticeship ratios by 900% radically reduces the impact and safety of these programs. By reducing the number of journeyman to apprentice to 10:1 from 1:1, you are effectively stripping the next generation of apprentices of valuable training in their craft. Imagine if we suddenly increased public school class size by 900%. It is a **flawed idea**.

Most importantly, **the increase of apprentices from 1:1 to 10:1 PUTS OUR PEOPLE AT SERIOUS RISK OF INJURY OR DEATH**. These ratios are not mythical things made out of thin air: they have been paid for **literally, in blood**.

As a voter, citizen, and taxpayer, I ask that you reject these proposed changes to the regulations immediately.

Forrest Roy
907-748-6248

From: Garrity, Larry <garrl0@BP.com>
Sent: Friday, January 10, 2020 2:51 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: Electrical Licensing

To the Commissioner,

I am writing today because I believe the proposed changes to the electrical licensing requirements is going cause more issues than it will help. The lives lost along with the equipment and structure damage will be enormous.

Having been in the electrical trade since 1982, a Journeyman since 1990. I have had many electrician apprentices work under me as a foreman and as a journeyman. I take great pride in the fact that the skills I have delivered to each one of them has kept them safe and away from harm in their careers.

It cannot be emphasized enough how important it is to teach these skills properly. It takes many hours of attention and discussion to reach the level of competency needed to become a Journeyman Electrician capable of not getting oneself or others killed. I would hate to see regulation changes that will create a poorly trained workforce in the future. I care about my previous apprentices and coworkers well being too much.

I believe this request for change is coming from a training center, one that only looks at their bottom line of making money. I can see the reason that the ability to have 10/1 apprentice ratio seems like a good idea. But it really does not work beyond that. This seems like a scheme to create a "Diploma Mill" for profit.

Lineman not needing to take a test to become a journeyman lineman is irresponsible and dangerous.

Our state requirements, and regulations, have been built on blood, pain and loss to become what they are now. I do not see a need to deviate and see how it works out.

All of these proposed changes will be ABUSED in the future, no matter how well meaning they are now. Leave them alone.

Thank you for your time,
Laurence Garrity

Sent from Mail for Windows 10

From: Vicki Van Fleet <jgvvf18@gmail.com>
Sent: Friday, January 10, 2020 2:52 PM
To: DOL LSS Regulations (DOL sponsored)
Subject: AlaskaSafe

As a former IBEW Juneau office administer, I worked directly with the apprentices from hire through turn out to Journeymen.

The new regulations or should I say lack thereof - would be harmful for not only the public, but also the workers. These apprenticeship standards were not created wily-nily, instead were shown to be the very best way to train a new and emerging workforce.

It seems to me that the workforce is of little concern in these new regulations and with that the safety of the general public.

Allowing 10 trainees to 1 journeyman is ludicrous....and obviously was proposed by individuals who were never in a qualified apprenticeship program.

Obviously, these new regulations would open up the gates to unskilled workers from the lower 48 seeking to make some fast bucks - but, possibly that's what this administration has had in mind all along.

Sincerely,
Vicki P. Van Fleet
45 year resident and registered voter of the Great State of Alaska

Mechanical Inspection Proposed Regulations

Questions and Answers

Division of Labor Standards & Safety: Mechanical Inspection – File No. 2019200855

Question:

Under the proposed regulations, must all trainees be indentured in an accredited apprenticeship program?

Answer:

No. Under the proposed regulations, apprenticeship registration will not be required to obtain a trainee certificate of fitness. However, it's important to realize that the experience requirement to obtain a journeyman certificate of fitness will be 8,000 hours of experience if the individual was indentured in a federally registered apprenticeship program and 12,000 hours of experience if the individual was not indentured in a federally registered apprenticeship. The proposal would create an alternate pathway outside of registered apprenticeship to legally obtain experience necessary for a journeyman electrical or plumbing certificate of fitness, but the individual would be required to pass the same extensive four-hour exam in order to obtain a journeyman certificate of fitness license.

It's also important to recognize that under current regulations, qualifying experience that meets the "legally obtained" standard is only limited to registered apprenticeship where it is legally mandated by the jurisdiction having authority. This means that an individual could legally obtain experience in another state where registered apprenticeship is not required and then move to Alaska and become a journeyman electrician or plumber after passing the exam.

Question:

Can a person qualify to take the journeyman test without ever registering as an apprentice?

Answer:

Yes. Under current regulations a person is qualified to take the journeyman test upon demonstrating 8,000 hours of legally obtained work experience. If the work experience is obtained in Alaska, current regulations limit that experience to federally registered apprenticeship. However, if the person gained experience in another state, such as Florida, where registered apprenticeship is not legally required, that person would be eligible under current regulations to take the journeyman test in Alaska after documenting 8,000 hours of on-the-job training work experience subject to the applicable code.

The proposed regulations will require 12,000 hours of work experience subject to the applicable code if the person was not enrolled in a registered apprenticeship program. This will be the same standard whether the experience was acquired inside or outside of Alaska. In essence, this simply puts Alaskans on a level playing field with non-residents who can currently acquire qualifying experience without being enrolled in a registered apprenticeship program.

Question:

Why is the department changing the apprenticeship requirement that was developed in 2003? Hasn't the apprenticeship requirement helped to improve the skills of Journeyman electricians and plumbers?

Answer:

The federally registered apprenticeship requirement was developed in 2006. The Department of Labor and Workforce Development supports apprentice training programs, and recognizes their value. This proposal does not change the requirement for registered apprenticeship for an 8,000

hour program, but is designed to offer an alternative route for Alaskans who are unable to take advantage of apprenticeship opportunities. There is no evidence to support the notion that the registered apprenticeship mandate improved the skills of journeymen electricians or plumbers in Alaska.

To determine whether safety improved after training for electricians was restricted to registered apprenticeship in 2006, the division evaluated the occupational safety and health fatalities in the electrical industry for a period 10 years prior to and 10 years after the change. From 1996 to 2006, there were zero fatalities in the electrical industry. From 2006 to 2016, there were three fatalities (one in 2010 and two in 2011) in the electrical industry and one of the accident victims was a registered electrical apprentice.

Question:

Will a person who is currently registered in a registered apprenticeship program be considered a "student trainee"?

Answer:

No. The proposed "student trainee" certificate of fitness is for students who are enrolled in state or federal education programs to allow those students to perform practical code installation work, on real-world projects, as part of their course of study. Under current regulations, there is no option for a training program to provide real world installation experience to students unless the students are enrolled in a federally registered apprenticeship program.

Question:

Has the Department considered the inherent risks involved with allowing students to participate in construction projects, and does allowing for a 10:1 supervision ratio on active construction projects provide for the safety of those students?

Answer:

The certificate of fitness helps to ensure the quality and integrity of electrical and plumbing installations in Alaska. The safety of students in a construction environment would be the responsibility of the educational program, and the proposed regulations limit the student trainee certificate of fitness in a training program administered by the state or federal government or a school district (including charter schools) to help ensure that student safety is of paramount concern.

Question:

Why are only state and federal administered education programs written into the proposed regulation changes? How can you exclude all the other non-profit and for-profit training programs who deliver trade-specific training to Alaskans?

Answer:

The department did not receive inquiries or requests from non-profit and for-profit training programs to establish a student trainee certificate of fitness. It is possible that a future regulation proposal could be developed to accomplish appropriate standards, and that a successful implementation of the current proposed regulations in this area could provide the necessary experience to help ensure a successful expansion for other types of training providers.

Question:

Can any private business create a training program to avoid licensing and journeyman to trainee ratios under these proposed regulations?

Answer:

No. The "student trainee" license will only be available to students enrolled in state or federally sponsored education programs whose students perform practical code installation work, on real-

world projects, as part of their course of study. There are exemptions for government entities for other licenses required to work as an electrical or plumbing contractor, which would not be available to a private business.

Question:

How did the department arrive at a permissible ratio of 10 student trainees to 1 journeyman for electrical and plumbing construction work? Why is the proposed trainee ratio different depending on whether the training program is public (“student trainee”) or private (“trainee”)?

Answer:

The ratio of 10 students to an instructor recognizes that most technical training courses require a low student/teacher ratio to ensure adequate direction and supervision. The standard ratio of 2 trainees per journeyman for certificate of fitness compliance is not affected by this regulatory proposal. The student trainee ratio is less restrictive because the training environment is different. In the student trainee scenario, the primary job of the instructor is to provide instruction and supervision (they are not being paid to complete an electrical or plumbing job) and the students are there solely to learn (they are not paid like apprentices and typically are paying tuition to the school).

Question:

Why is the department diverging further from the USDOL Office of Apprenticeship's 1 trainee to 1 journeyman ratio, which is based on its conclusion that it 1 to 1 is the maximum ratio that protects trainee safety in high-hazard industries such as plumbing and electrical construction?

Answer:

The student trainee certificate of fitness is designed to provide increased training opportunities for Alaskans in the electrical and plumbing trades. This proposal should not be viewed to compete with the federally registered apprenticeship model, which requires a one to one journeyman to apprentice ratio. The student trainees are not apprentices. Current, long-standing Mechanical Inspection regulations have allowed for a ratio of up to two trainee certificate of fitness holders per journeyman and these ratios are unchanged under the proposed regulations.

Question:

Under the proposed regulations, what is the purpose of the trainee certificates of fitness and associated \$250 fee?

Answer:

Alaska Statutes require individuals to hold a license (certificate of fitness) to perform certain types of work such as electrical wiring, high voltage, or plumbing installations. The purpose of the trainee certificate of fitness is to provide a mechanism to allow an individual to learn the electrical or plumbing trade by performing work subject to applicable codes under adequate supervision. The proposed “student trainee” certificate was developed at the request of educational programs who want to be able to perform limited electrical and plumbing code work as part of their hands-on curriculum. The purpose of the certificate is to provide a means for these students to gain skills, in a legally permissible teaching environment, while accumulating credible hours for the time spent performing these installations.

The proposed regulations do not change the trainee or journeyman certificate of fitness fees. The associated fees cover the administrative costs of issuing the license, as well as fund electrical and plumbing inspection and enforcement activities statewide. In the case of a student trainee certificate of fitness fee, the license would be transferrable for the period of the license to employment performed by the individual as a plumber or electrical trainee.

Question:

What is department's reason for proposing to allow the commissioner to waive fees for "student trainee" certificates of fitness but not for "trainee" certificate of fitness?

Answer:

This proposal is designed to recognize that, unlike trainees working for an employer, student trainees will not typically receive wages while they are engaged in training and that there may be circumstances where the fee creates a hardship for an individual or a training program that could be resolved through a Commissioner waiver.

Question:

Does the student certificate of fitness require that all work be inspected, or only that the program agree to allow inspection? How does the agreement to allow inspection differ from current electrical and plumbing inspection statutes and regulations?

Answer:

As part of utilizing "student trainee" licensees to perform work, the educational institution would be explicitly required to comply with state or local inspections as required by statute or ordinance. The proposed regulation does not add any additional inspection requirements above those which already exist.

Question:

Commissioner Ledbetter signed a \$1 million federal apprenticeship expansion grant in June 2019, to expand construction apprenticeships in Alaska. The Electrician occupation has the most registered apprentices nationally, and also in Alaska. Why would she sign that grant, knowing that this licensing regulation change was in the works?

Answer:

The Department of Labor and Workforce Development is committed to expanding registered apprenticeship training opportunities for Alaskans. This regulation does not change that goal. The department is continuously working to improve opportunities for Alaskans to receive training, so they can obtain good paying jobs and meet industry needs for qualified workers. Limiting efforts solely to federal apprenticeship programs as a training model for entry into high paying skilled trade jobs would leave many Alaskans behind.

Question:

Is the proposed definition of "electrical wiring" intended to cover work performed under the National Electrical Safety Code, and if so, which tasks would no longer require a lineman certificate of fitness?

Answer:

Yes. The proposed definition was crafted in line with Attorney General Opinion 1656-300-84 (May 1, 1984), which determined that operating a helicopter or tree trimming equipment to trim brush around electrical lines, though subject to electrical code requirements, does not necessarily constitute "electrical wiring" work which would require a certificate of fitness. The proposed regulation aims to publicly codify current policy under Mechanical Inspection Policy Letter 19-002, which provides examples of the functions that would not require a certificate of fitness.

Question:

Under the proposed changes to 8 AAC 90.900(10) and (16), what definition of "heavy equipment" will the department use to determine which tools used to perform electrical or plumbing installations will require a certificate of fitness vs. not require one?

Answer:

The proposed regulation does not provide a firm definition, but is designed to help codify existing Mechanical Inspection Policy Letter 19-002. In general the proposed definition would

apply to the operation of heavy power equipment such as cranes, loaders, excavators, piledriving equipment and other construction heavy equipment that requires specialized skills unrelated to electrical or plumbing work.

Question:

What studies have been done to back up the need to implement a "student trainee" classification?

Answer:

The department did not conduct studies. Over the years, training programs have been subjected to corrective enforcement actions for violating the limitations on having students who are not licensed trainees perform hands-on work as part of a curriculum. This experience demonstrated the need and caused educational programs to request relief from the restrictive regulations to perform limited real world plumbing and electrical installations as part of their hands on curriculum.

Question:

What is meant by the term "Direct Supervision"?

Answer:

The proposed regulations do not redefine the term "direct supervision" which is already defined in 8 AAC 90.900(6): *"direct supervision" means that while the trainee is legally performing work to the Standards established in either AS 18.60.580 and 8 AAC 70.025 or AS 18.60.705 and 8 AAC 63.010 a certified journeyman is on the same job site, on the same floor and in close and continual control of the trainee and is responsible for the competency of the work performed by the trainee.*

Question:

Have you ever visited a construction site and witnessed a competent Journey-worker try to do his/her job effectively and "directly supervise" more than one qualified apprentice?

Answer:

This question appears to be rhetorical.

Question:

Do you think it to be physically possible to "directly supervise" ten unqualified trainees in ten different rooms?

Answer:

In a student training scenario, an instructor is typically able to provide adequate supervision for students at a ratio of 10 students to one instructor. The educational programs will be responsible to have standards to ensure the adequate supervision of students in their programs.

Question:

Why would you want to turn this state into another Alabama?

Answer:

This question is unclear and appears to be rhetorical.

Question:

Do we need a first death/lawsuit to support out any perceived cost reductions???

Answer:

This question lacks specificity and appears to be rhetorical. To determine whether safety improved after training for electricians was restricted to registered apprenticeship in 2006, the division evaluated the Alaska occupational safety and health fatalities in the electrical industry for a period 10 years prior to and 10 years after the change. From 1996 to 2006, there were zero fatalities in the electrical industry. From 2006 to 2016, there were three fatalities (one in 2010

and two in 2011) in the electrical industry and one of the accident victims was a registered electrical apprentice.

Question:

Why this change was deemed to be necessary?

Answer:

It is unclear which change this question is applicable to. In general, the primary aspects of the proposed regulations are necessary to update code standards and expand training opportunities for Alaskans in the plumbing and electrical industry.

Question:

Was there any input from a single tradesman or tradeswoman?

Answer:

Yes. Various aspects of the regulation proposal have been raised over the years by individuals engaged in the plumbing and electrical trades in Alaska.

Question:

Did you know the IBEW was formed to fight for worker safety because at the time (the 1890's) being a power lineman was the most dangerous job on earth?

Answer:

This question is not specific to the regulatory proposal.

Question:

Will DOLWD provide oversight of ratio requirements?

Answer:

As DOLWD inspectors visit work sites, they enforce the current statewide minimum ratio of two trainees to one journeyman for electrical and plumbing work. This practice will not change under the proposed regulations, and businesses and individuals found violating the ratio will be subject to enforcement action.

Question:

Who will regulate the safety standards for those companies when they are not participating in a USDOL approved apprenticeship program?

Answer:

Workplace safety in Alaska falls under the jurisdiction of Alaska Occupational Safety and Health. All employees, including trainees are subject to the workplace safety standards already in place in Alaska. This proposed regulation has no effect on the regulation of workplace safety.

To determine whether safety improved after training for electricians was restricted to registered apprenticeship in 2006, the division evaluated the Alaska occupational safety and health fatalities in the electrical industry for a period 10 years prior to and 10 years after the change. From 1996 to 2006, there were zero fatalities in the electrical industry. From 2006 to 2016, there were three fatalities (one in 2010 and two in 2011) in the electrical industry and one of the accident victims was a registered electrical apprentice.

Question:

Who will be responsible for informing future trainees of the multiple routes to journeyman status that these regulations provide?

Answer:

The department will develop an information sheet that will be distributed to new trainee applicants and available on the Mechanical Inspection web page. The information sheet will

describe the routes to successful accumulation of legal hours, the difference between apprentice and non-apprentice hours, and what documentation will be required to take the journeyman exam for their trade.

Question:

Can trainees combine registered apprentice hours and non-registered apprentice hours to qualify to sit for the exam after 8,000 hours?

Answer:

No. In order to qualify at 8,000 hours, all of the qualifying hours must have been earned while registered as an apprentice. Otherwise the 12,000 hour limit will apply, regardless of the status when the hours were earned, so long as all other legal requirements were met.

Question:

How will DOLWD regulate “student trainees” when they are working outside of the classroom environment for other contractors?

Answer:

The “student trainee” certificate of fitness will not be considered valid for work performed outside of the classroom environment. Unlike a trainee certificate of fitness, the “student trainee” certificate of fitness would only be valid within the classroom environment, and is not intended to be transferrable to other projects.

Question:

How would hours of work be counted for a “student trainee”? Are those hours counted as “classroom hours”?

Answer:

Under the “student trainee” certificate of fitness, hours of practical installation work, which was subject to state codes would be reportable to the department using the current Employer Verification Forms and completed by an authorized representative of the educational program. The hours would be counted separately as hours worked, so long as the work was performed legally and in accordance with the regulations.

Question:

Why doesn't DOLWD simply change the rules regarding working out-of-state instead of changing rules for Alaskans?

Answer:

The department contends that Alaskans will benefit from increased training pathways into the electrical and plumbing trades. The current regulations limit training opportunities for Alaskans and provide unfair opportunities for individuals who acquire experience in other states where registered apprenticeship is not required.

Question:

Will DOLWD need to approve contractors who wish to hire trainees but do not want to participate in a USDOL apprenticeship program?

Answer:

No. There is nothing in the proposed regulation that would create an approval requirement for contractors. Electrical and plumbing contractors would be free to employ trainees so long as they adhered to the State of Alaska journeyman to trainee supervision ratio of 2:1. Trainees would be responsible for ensuring that they collect employer verification forms from each employer or job. This is the same way electrical and plumbing on-the-job training was accomplished and documented prior to 2006 in Alaska.

Question:

In the FAQ section – the answer on ratio of 10-1 did not adequately address safety or quality of education. It does not matter if one is paid or attending school. The work should be the same if they are learning the same trade. Why is it safe and how can it be quality education if 10-1?

Answer:

The ratio is designed to provide a close level of supervision for students. The safety of the students will ultimately be the responsibility of the educational training program.

Question:

Would you have someone working on your job who could cause harm or be harmed due to poor training?

Answer:

This question appears to be rhetorical and does not clearly apply to the proposed regulations.