



INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, 8531 BREWERTON ROAD, SUITE 1, CICERO, NEW YORK 13039

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October 31, 2019

VIA FIRST CLASS MAIL

Apprenticeship Training Program Office
 NYS Department of Labor
 W. Averell Harriman State Office Campus
 Building 12, Room 459
 Albany, NY 12240

**Re: Comments on New Program
 Village of Holley Municipal Electric & Water**

To whom it may concern:

The purpose of this letter is to submit comments on the Village of Holley Municipal Electric & Water's application to become a sponsor of an apprenticeship program for "Electrical (Outside) Line Worker". I submit this comment as the Business Manager for the International Brotherhood of Electrical Workers, Local 1249.

It is Local 1249's position that the Department of Labor should not give approval for the Village of Holley Municipal Electric & Water to become a sponsor for this apprenticeship program. Electrical (Outside) Line Worker apprentices are **required** to receive minimum training in numerous distinctive work processes:

<u>Category</u>	<u>Approximate Hours</u>
A. Tools, Equipment and Safety	400
B. Set Towers, Poles and Construction Of Other Devices to Hold Electric Wiring	2000
C. Establishing Work Position for Maintenance and Repairing Overhead Distribution of Transmission Lines	300
D. Stringing New Wire or Maintenance of Old Wire	1000
E. Installation and Maintenance of Insulators	300

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F. Installation and Maintenance of Transformers and Other Equipment	1000
G. Installation, Repair and Maintenance of Underground Electrical Distribution Systems	1000
H. Assembly and Erection of Substation	1000
I. Installation, Maintenance and Repair of Traffic Or Train Signals and Outdoor Lighting	500
J. Trimming Tree	200
Total	<u>7000</u>

The area served by this proposed program is just 1.3 square miles. Given the size of this service area, the existing electric grid and infrastructure and the rate that this equipment and systems would, in a worst possible case scenario, need to be serviced and replaced, it would be **impossible** for these individuals to receive the 7,000 hours of necessary training in 42 months.

Local 1249 submits that the Department of Labor should review this with the applicant in detail prior to awarding the sponsorship. Please take this information we have provided into account when reviewing the qualifications of this proposed apprenticeship program. I am confident if you review this in detail you will reject this application. I fear awarding this entity a sponsorship will set a horrible precedent and, more importantly, could result in serious injuries and potentially fatalities.

If you have any questions or concerns, please do not hesitate to contact me. I would be willing to meet with you in person if this would be helpful.

Very truly yours,



Mark Lawrence
Business Manager/ Financial Secretary