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October 16, 2017

The Honorable Roberta Reardon
Commissioner, New York State Department of Labor
State Capitol Building
Albany, NY 12224

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Dear Commissioner Reardon,

The Broadway League has been the principal trade association for the commercial theatre industry for more than 80 years. The League represents over 700 individual members nationwide, with more than 400 residing in New York. Our membership includes the producers, presenters, general managers and theatre owners who collaborate to deliver live entertainment to New York, North America and countries around the world. Broadway directly employs more than 10,000 people in New York City and indirectly employs more than 80,000 full-time equivalent workers. Broadway is a unique, diverse and well-paying industry that offers an inviting, dynamic and professional employment environment.

The League endorses the statement submitted by the Motion Picture Association of America relating to proposed regulations governing "just-in-time," or "on-call" schedules as the issues addressed in these proceedings are of similar concern to live theatre in New York. Theatrical employees understand that producing a live event requires work schedule changes resulting from countless factors, including additional rehearsals, work calls to address safety concerns, as well as technical and personnel changes that may arise during production. Modified schedules are inherent to this industry, while union rules often prohibit our employers from simply swapping one worker for another due to the specialized skill of each employee.

The need for flexibility is understood by the theatrical workforce. The vast majority of theatrical employees are engaged under union contracts which provide clear and unambiguous policies for addressing the realities of a fluid work environment. Those theatrical employees who may not be represented by collective bargaining agreements are likewise aware that schedules must remain flexible to accommodate an environment that changes rapidly because of unanticipated events.

Due to Broadway's significant financial, employment and institutional importance to New York, The League requests that the Department of Labor take all of the foregoing concerns into consideration as it advances these proceedings.

Sincerely,

Charlotte St. Martin
President