



March 4, 2008

Thomas M. Dowd, Administrator  
Office of Policy Development & Research  
U.S. Department of Labor  
200 Constitution Avenue NW, Room N-5641  
Washington, DC 20210

Subject: Proposed Amendments and Revisions to 29 CFR 29, Apprenticeship Programs  
Labor Standards for Registration of Apprenticeship Programs

Dear Mr. Dowd:

The Association of Union Constructors (TAUC) represents more than 2,500 union construction firms engaged in steel erection, industrial maintenance and construction throughout the United States. TAUC is the largest multi-craft union contractor association in America.

On behalf of TAUC, I urge you to revisit the proposed rule changes issued on December 13, 2007 by the U.S. Department of Labor (DOL) to amend and revise 29 CFR 29, Apprenticeship Programs, Labor Standards for Registration of Apprenticeship Programs.

TAUC contractors routinely employ union craftsmen and women on construction and maintenance projects that build and maintain the most critical elements of our nation's infrastructure. These union men and women are among the most thoroughly trained and highly skilled construction industry professionals in the world. They attain this level of proficiency by participating in rigorous and lengthy union apprenticeship programs.

Union apprenticeship programs consists of many elements: academic instruction; hands-on training in the proper physical execution of tasks such as welding, burning and cutting; physical observation of skilled crafts men and women performing tasks correctly; and a minimum of at least 2,000 hours of on-the-job training where skills learned in the classroom are performed in the field under professional supervision.

TAUC contractors are highly concerned that the proposed amendments and revisions to 29 CFR 29 could, theoretically, enable apprentices to satisfy his or her apprenticeship requirements without ever stepping foot into a classroom or taking a single formal examination.

In light of this possibility, TAUC encourages your department to reconsider its current recommendations and we strongly recommend including specific language in your proposal that will require on-the-job training and traditional classroom instruction as mandatory conditions for the completion of traditional construction and industrial apprenticeship programs.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert Hoover", is written over a white background.

Robert C. Hoover  
President

cc: S. Lindauer