



February 12, 2018

Secretary Alexander Acosta
U.S. Department of Labor
S-2521
200 Constitution Ave. NW
Washington, DC 20210

RE: Task Force on Apprenticeship Expansion Proposal to Create Industry-Approved Apprenticeship Programs that are Outside of the Registered Apprenticeship System

Dear Mr. Acosta:

The Association of Union Constructors (TAUC) represents more than 2,000 union construction firms engaged in industrial maintenance and construction throughout the United States. TAUC is the largest multi-craft union contractor association in America.

TAUC contractors routinely employ skilled union craft personnel on construction and maintenance projects that build and maintain the most critical elements of our nation's industrial infrastructure. These union men and women are among the most thoroughly trained and highly skilled construction industry professionals in the world, and allow our members to provide the safest, highest quality, most cost-effective construction services to their customers. These high-skilled construction workers attain this level of proficiency by participating in rigorous joint labor-management registered apprenticeship programs.

Joint labor-management apprenticeship programs consist 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.

It is important to note that these programs and the life-long skills they provide participants are funded by signatory construction contractors. These programs are not reliant on taxpayer funds to provide this high-level of training. This privately funded, jointly administered program structure ensures that the graduates of these construction training programs have the skills and training contractors need to deliver safe, high-quality construction services to their customers.

TAUC contractors are highly concerned that the Task Force on Apprenticeship Expansion is considering a proposal to create industry-approved apprenticeship programs. We believe this could undermine the robust registered apprenticeship system already in place in the construction industry. TAUC strongly encourages your department to ensure that any new guidelines from the Task Force on these new industry-approved apprenticeship programs would not apply to the construction industry. Registered apprenticeship that requires both on-the-job training and traditional classroom instruction as mandatory conditions for the completion of traditional construction and industrial apprenticeship programs are

proven to provide the highest quality craft personnel in the construction industry at no cost to the taxpayer.

We ask that as the Task Forces works to complete its work on recommendations and strategies to expand apprenticeships that it acknowledge the unique nature of the existing construction industry apprenticeship programs. This joint labor-management system has a proven track record of delivering privately funded and effective high skilled training programs. As such, we would urge that the Task Force not develop recommendations that would erode the joint labor-management apprenticeship and training system in the construction industry.

We appreciate the opportunity to provide comments on this critical issue. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen R. Lindauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen R. Lindauer
Chief Executive Officer

SRL/trm