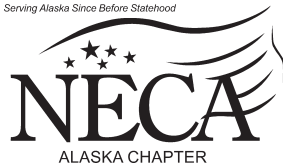


ALASKA JOINT ELECTRICAL APPRENTICESHIP AND TRAINING TRUST



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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 The current proposal should be withdrawn, and the department should actively engage stakeholders to build effective regulations, and to enhance work opportunities in these industries.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 journeymanship, 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