

**EASTERN NEW YORK LABORERS' DISTRICT COUNCIL
UPSTATE NEW YORK LABORERS' DISTRICT COUNCIL**

March 28, 2011

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

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Comments on New Program, Plumber-Pump and Tank

On behalf of the hard working men and women of the Laborers' International Union of North America, the Eastern New York Laborers' District Council and the Upstate New York Laborers' District Council, we strongly object to Plumber Local Union 200's recent application for a new apprenticeship designation of Plumber (Pump and Tank).

Our objection is based on the duplicitous nature of the outlined work processes that would clearly violate long standing jurisdictional assignments. Jurisdictional issues include:

- A-2 Unloading of materials (*Multiple Jurisdictions*)
- A-3 Use of power lifts and personnel lifts (*Jurisdiction of the Operating Engineer*)
- B-4 The operating of heavy equipment, including backhoes and skid steers (*Jurisdiction of the Operating Engineer*)
- B-5 Operating vehicles that require CDL certification including dump trucks and trailers (*Jurisdiction of the Teamster*)
- D-6 Masonry work, including concrete forming and finishing (*Jurisdiction of Laborer, Carpenter and Mason*)
- D-7 Excavation and Trenching, using backhoe, shovels, transit and level (*Jurisdiction of Operating Engineer and Laborer*)
- D-8 Shoring (*Jurisdiction of the Operating Engineer and Laborer*)
- D-9 Connection to outside lines (*Jurisdiction of the Laborer*)

D-10 Dewatering (*Jurisdiction of the Laborer*)

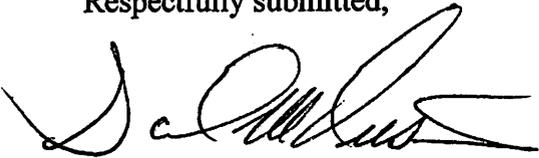
D-11 Basic site monitoring and remediation (*Jurisdiction of the Laborer*)

F-1 Installation of electrical controls (*Jurisdiction of the Electrician*)

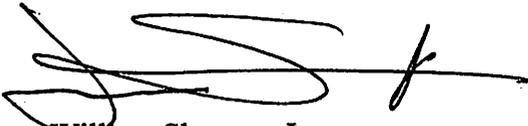
The work processes outlined in Appendix A for this new apprenticeship designation clearly overlap the historical jurisdiction of multiple trades. Therefore, we respectfully ask the New York State Department of Labor, Apprenticeship Training Office to reject this application in its entirety.

If you have any questions or require any additional information, please do not hesitate to call us at your earliest convenience.

Respectfully submitted,



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