

# ALASKA STATE LEGISLATURE



## House of Representatives

January 13, 2020

Dr. Tamika L. Ledbetter, Commissioner  
Alaska Department of Labor and Workforce Development  
P.O. Box 11149  
Juneau, AK 99811

Re: Notice of Proposed Regulations – Mechanical Inspection

Dear Commissioner Ledbetter,

We are writing to express our strong opposition to changes in plumbing and electrical regulations that would eliminate apprenticeship utilization and double the ratio of apprentices to journeyworkers. These regulations would significantly expand the risk of on-the-job deaths and serious injuries while undermining the primary workforce development system for the industry.

Registered Apprenticeship has long been the cornerstone of training in the electrical and plumbing industries. With a 1:1 ratio of apprentices to journeyworkers, apprenticeship training dramatically lowered death rates while improving productivity and ensuring that companies benefit from a consistent pipeline of workers with on-the-job training. As the department itself has documented, apprenticeship has an unparalleled record of providing a skilled workforce, which means more jobs for Alaska residents and more skilled workers available for Alaska business owners.

The proposed regulations would be devastating for multiple reasons. First, they eliminate the "apprenticeship" requirement and would replace it with a nebulous "trainee" standard. Second, the proposed regulations would double the number of trainees who could be supervised by a journeyworker. For occupations where a single error can result in death--not just for individual workers but others on a job site--these changes present a clear and present danger to the life and safety of Alaska workers, and must be discarded.

It is important to note that joint Registered Apprenticeship programs invest approximately \$50,000 per year over a four-to-six- year period to train electricians and plumbers. The proposed regulations would substantially undercut this system, and would not only endanger Alaskans but also contribute to massive disinvestment from our workforce development system. We only have a high-quality apprenticeship system for these occupations because it is funded by industry and employees, with professional instructors, classrooms, and training facilities. Eliminating

apprenticeship requirements and changing journeyworker-to-trainee ratios would allow substandard firms to consistently underbid firms that invest in adequate training.

Finally, these regulations would tear down an important career ladder for our military veterans. Both electrical and plumbing apprenticeships have well-established programs (such as VIP: Veterans in Piping) for transitioning service members entering the trades. Gutting apprenticeship would mean more veterans would leave Alaska due to lack of transitions into post-service employment.

We want good jobs with decent pay and excellent training for high standard, quality work and safety. We urge you to withdraw these proposed regulations and stand with Alaska businesses and workers for whom the apprenticeship system is the foundation of workforce development.

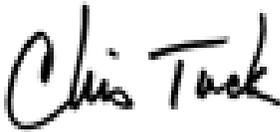
Thank you,



Representative Zack Fields



Representative Kelly Merrick



Representative Chris Tuck



Representative Gabrielle LeDoux



Representative Jonathan Kreiss-Tomkins



Representative Dan Ortiz



Representative Matt Claman



Representative Grier Hopkins



Representative Ivy Spohnholz



Representative Andy Josephson



Representative Sara Hannan



Representative Andi Story



Representative Laddie Shaw



Representative Louise Stutes



Representative Harriet Drummond



Senator Elvi Gray-Jackson



Senator Tom Begich



Senator Scott Kawasaki