



Local 103
OF GREATER
BOSTON

International Brotherhood of Electrical Workers

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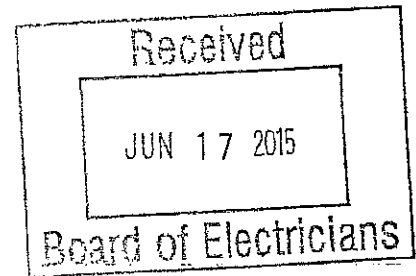
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June 12, 2015

Mr. Donald Jansen, Executive Director
Board of State Examiners of Electricians
1000 Washington Street, Suite 710
Boston, MA 02118



Dear Director Jansen,

I am writing on behalf of the 7,500 members of International Brotherhood of Electrical Workers (IBEW), Local 103, and its Joint Apprenticeship and Training Committee. We are writing in response to Governor Baker's Executive Order No. 562 to Reduce Unnecessary Regulatory Burden.

In 2014, the members of the Board of State Examiners of Electricians (BSEE) took on the daunting task of reviewing 237 C.M.R. 1.00-23.00. At that time, former Business Manager, Michael Monahan, submitted a letter to the Board expressing opposition to modifying or eliminating the existing education/work guidelines set forth in 237 C.M.R. 13.09. IBEW, Local 103, would like to reiterate its position on that matter.

Our opposition to any changes, as it relates to the education/work guidelines, is a matter of public safety. The men and women who work in the electrical industry need to maintain consistent training and on-the-job experience to ensure electrical installations are completed in accordance with all current laws and codes. A person who has dabbled in the trade over a decade ago has not retained the knowledge or practical experience necessary to practice safely.

Allowing tradespeople to earn an apprenticeship in a sporadic manner over many years lends itself to the belief that mechanical building trades careers are not to be taken seriously. As licensed electricians and technicians, we know that this is not the case, especially when dealing with potentially life threatening situations in this industry. The vast majority of our peers finish their apprenticeships in a timely manner. The existing sunset of education/work guidelines provide for a fair and appropriate amount of time to complete a program. Consistent training and up-to-date work procedures must be upheld.

IBEW, Local 103, can empathize with extenuating circumstances that may cause an apprentice to need to put their training on hold for a limited time. Unforeseen circumstances, such as military service, medical emergencies, birth of a child or economic hardship should be reviewed on a case-by-case basis by our statutory governing body, the BSEE.

Please let me know if I can answer any questions on our position. Thank you for your consideration.

Sincerely,

John P. Dumas
Business Manager