



INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, 8531 BREWERTON ROAD, SUITE 1, CICERO, NEW YORK 13039

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January 24, 2024



NYS Department of Labor
Apprentice Training

JAN 30 2024

VIA FIRST CLASS MAIL

Central Office

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

Re: Comments on Proposed Electrical Outside Line Worker Apprenticeship Program

To Whom it May Concern:

The purpose of this letter is to provide you with information on Upstate Pole Services, LLC's application to become a sponsor of an Electrical Outside Line Worker Apprenticeship Program. I submit this comment as the Business Manager for the International Brotherhood of Electrical Workers, Local 1249 and ask you to consider it as you review the application.

It is Local 1249's position that the Department of Labor should not give approval to the Upstate Pole Services, LLC application to become a sponsor for this apprenticeship program. Electrical (Outside) Line Worker apprentices are *required* to receive minimum training in numerous distinctive work processes:

<u>Category</u>	<u>Approximate Hours</u>
A. Tools, Equipment and Safety	400
B. Set Towers, Poles and Construction of Other Devices to Hold Electric Wiring	2000
C. Establishing Work Position for Maintenance and Repairing Overhead Distribution of Transmission Lines	300
D. Stringing New Wire or Maintenance of Old Wire	1000
E. Installation and Maintenance of Insulators	300

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F.	Installation and Maintenance of Transformers and Other Equipment	1000
G.	Installation, Repair and Maintenance of Underground Electrical Distribution Systems	1000
H.	Assembly and Erection of Substation	1000
I.	Installation, Maintenance and Repair of Traffic or Train Signals and Outdoor Lighting	500
J.	Trimming Tree	200
	Total	<u>7000</u>

Upstate Pole Services, LLC does not perform much of the work that would be needed to train an apprentice so that they could possibly meet the hours. For example, Upstate Pole Services, LLC does not perform any energized distribution for utility companies or municipalities, any substation work, any overhead or underground transmission work, or any traffic signal or street lighting work. Local 1249's representatives have personally conferred with various Upstate New York Utilities that operate in the area where Upstate Pole Services, LLC's operates, and they each have stated that they have not worked with the Company. Rather, Upstate Pole Services, LLC workers primarily work with commercial entities such as solar developers and Home Depot etc.

Given the work performed by Upstate Pole Services, LLC, it would be impossible for these apprentices to receive the 7,000 hours of training in 42 months. We submit that the Department should review this with Upstate Pole Services, LLC in detail to ensure compliance with its requirements. We ask that you please take the information I have provided into account when you next review the qualifications of this proposed apprenticeship program. I am confident if you review this in detail, you will not certify this program.

If you have any questions or concerns, please do not hesitate to contact me. I would be willing to discuss this with you telephonically if this would be helpful.

Very truly yours,



Mark Lawrence
Business Manager
IBEW Local 1249

February 13, 2024

To Whom it May Concern,

My name is [REDACTED]. I am writing to you today regarding the Outside Electrical Line Worker application that was submitted to the NYSDOL by Upstate Pole & Line Services, LLC of Binghamton, NY. I do not believe that the above-mentioned application submitted by Upstate Pole Services, LLC should be approved based on my experience.

From [REDACTED], I served as an apprentice for [REDACTED] in [REDACTED], NY.

[REDACTED] Journeyman Lineman in the Outside Electrical Line Worker industry. I worked on traffic signals and street lighting. At no time did I work on any energized, or deenergized primary distribution or transmission. I never worked in substations. I never set poles in energized distribution, nor did I frame poles, install primary conductors, transformers or any other equipment that would be needed to build a distribution or transmission system.

[REDACTED]

[REDACTED] the employer was allowed to pay apprenticeship wages. I never received a diploma or any other type of certification that stated that I successfully completed the program and that I achieved Journeyman Lineman status, nor could I have been with what I was doing in the field.

[REDACTED] I truly feel that any apprentice that is allowed to work in the same type of situation where the necessary skills of a Journeyman Lineman are not being learned and applied will be treated the same way.

Sincerely,

[REDACTED]



LOCAL
1249

New York State Lineman's
Safety Training Fund

8531 Brewerton Road

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Cicero, New York 13039

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Dan Pollock
Safety Director

NEW YORK STATE LINEMAN'S SAFETY TRAINING FUND

February 14, 2024

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

Re: Comments on Proposed Electrical Outside Line Worker Apprenticeship Program

To Whom it May Concern:

This letter is to comment on the application made by Upstate Pole Services, LLC to become a sponsor of an Electrical Outside Line Worker Apprenticeship Program. As the Director of Safety & Training at the New York State Lineman's Safety Training Fund, and being a Journeyman Lineman myself, having completed an approved Electrical Outside Line Worker Apprenticeship Program-I know firsthand how important On-The-Job training is. I don't feel "apprentices" under this sponsor would get even close to meeting the requirements necessary to make a safe and proficient lineman that the standards demand. If Upstate Pole Services were to get this apprenticeship, an "apprentice" would have no path to completing the needed OJT to be a Journeyman Lineman. There is no Related and Supplemental Instruction that came give an apprentice the real experience required to become a Journeyman Lineman.

New York State Lineman's Safety Training Fund **STRONGLY OPPOSES** this application made by Upstate Pole Services LLC in fear that apprentices will not be properly trained in the necessary disciplines of "Line Work" and would not be able to offer the apprentice a fair and true apprenticeship.

Sincerely,

Dan Pollock

Director of Safety & Training

