



International Union of Elevator Constructors

July 29, 2019

Frank J. Christensen
General President

James K. Bender, II
Assistant General President

Larry J. McGann
General Secretary-Treasurer

Vice Presidents

Leonard R. Legotte

John P. Orr

Tony T. Gazzaniga

Mike Funk

John R. Valone

Jerry A. Cluff

Sean R. McCormick

Joseph M. Williams

F. Allen Thompson

Patrick W. Strafer

HEADQUARTERS
7154 Columbia
Gateway Drive
Columbia, Maryland
21046
<http://www.iuec.org>

TELEPHONE
(410) 953-6150

FAX
(410) 953-6169

Affiliated with the AFL-CIO



Dear Brothers and Sisters,

It is almost unbelievable, but we are writing to you once more about yet another threat to our industry and our union livelihood, a threat to one of the most sacred hallmarks of the organized building trades—our union apprenticeship programs.

Just this past month, the Trump Administration proposed a rule to support Industry Recognized Apprenticeship Programs (IRAPs) for industries that have either not had the support of a formal apprenticeship program or where such a program has not been successful. IRAPs would provide training through an “industry-leading organization” and would remove the Department of Labor or state labor departments from overseeing such training. This proposal would essentially make IRAPs unregulated yet would legitimize them in the eyes of the government.

For now, the proposal exempts the use of IRAPs to provide training in the construction industry because our *registered* apprenticeship programs have proven so successful. But do not take comfort in this exemption as it is only an **initial** exemption and that is simply not good enough. Until we have a commitment, in writing, that training in the construction industry will be **permanently** exempted from the use of IRAPs and our apprenticeship programs will remain the industry standard in training, we will consider ourselves under attack by our anti-labor White House.

The impact that IRAPs could have on organized labor is tremendous. When you consider both apprentice-level and journeyman-level training, the training programs of the Building Trades combine to be five times larger than any degree-granting college or university in the United States! Our union training programs provide superior training to millions of construction workers every year, and have long been our greatest tool in advancing and protecting our unionized construction industry.

To be clear, we are not in support of IRAPs for any industry as we firmly believe that a lack of regulation weakens an industry and stands to jeopardize working men and women, but our concern right now is on our construction industry, and time is of the essence. The Department of Labor is accepting comments from the general public, only until August 26th, on the proposed use of IRAPs. We must make our voice heard, loud



International Union of Elevator Constructors

Frank J. Christensen
General President

James K. Bender, II
Assistant General President

Larry J. McGann
General Secretary-Treasurer

Vice Presidents

Leonard R. Legotte

John P. Orr

Tony T. Gazzaniga

Mike Funk

John R. Valone

Jerry A. Cluff

Sean R. McCormick

Joseph M. Williams

F. Allen Thompson

Patrick W. Strafer

HEADQUARTERS
7154 Columbia
Gateway Drive
Columbia, Maryland
21046
<http://www.iuec.org>

TELEPHONE
(410) 953-6150

FAX
(410) 953-6169

Affiliated with the AFL-CIO



and clear, in large numbers, to demand that the construction industry be **permanently** exempted from IRAPs. There is no doubt that organizations such as the non-union Associated Builders and Contractors (ABC) will be spending millions of dollars and countless hours currying favor with their friends in government to work against us and open the door for IRAPs in our industry. We cannot let this happen or we risk compromising our greatest advantage—our union training programs.

We have joined forces with the Building Trades in an effort to voice our opposition to IRAPs and have created a website for you to use to quickly and easily customize your own letter to be sent to the Department of Labor. Please visit <http://saveneiepapprenticeship.org/> and put your voice in the ring to fight this latest effort to weaken organized labor.

It is the Building Trades' goal to send 250,000 letters to the DOL by August 26th. We hope you will join us in this effort, an effort to protect union labor.

As our enemies continue to attack us from all sides—our pension, our ability to organize, and now our longstanding apprenticeship programs—we must continue to greet them with intense opposition to protect all that we have worked so hard to build, all that we must refuse to lose!

Visit <http://saveneiepapprenticeship.org/> now to make the DOL commit to permanently exempting construction apprenticeships from Industry Recognized Apprenticeship Programs.

In Solidarity,

Frank J. Christensen, General President

James K. Bender, Assistant General President

Larry J. McGann, General Secretary-Treasurer