



**INTERNATIONAL
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OF ELECTRICAL
WORKERS.**

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March 24, 2010

Ms. Denise M. Boucher
Director of the Office of Policy,
Reports and Disclosure
Office of Labor-Management Standards
U.S. Department of Labor
200 Constitution Avenue, N.W., Room N-5609
Washington, DC 20210

Dear Ms. Boucher:

The International Brotherhood of Electrical Workers (IBEW) strongly agrees with the proposed changes in the Federal Register Notice of February 2, 2010 to, rescind Form T-1, return subsidiary unions to form LM-2 reporting, and revise its interpretation regarding LMRDA coverage of intermediate labor organizations.

It is the IBEW's belief that 2003 formulation of the Form T-1 and the 2003 change of the OLMS long held interpretation of the definition of "labor organization" under the Labor-Management Reporting and Disclosure Act were ill conceived attempts to add burdens to labor organization reporting. This is evidenced by the limited reporting participation garnered and the lack of oversight and enforcement provided for the 2003 changes.

The IBEW wishes to take this opportunity to commend the Department of Labor, Office of Labor-Management Standards, for proposal to return to the long established pre 2003 reporting forms and interpretation of "labor organization".

Sincerely yours,

Edwin D. Hill
International President

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