



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

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LONNIE R. STEPHENSON
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Secretary-Treasurer

August 19, 2015

Andrew R. Davis, Chief of the
Division of Interpretations and Standards
Office of Labor-Management Standards
U.S. Department of Labor
200 Constitution Avenue, NW, Room N-5609
Washington, D.C. 20210

Dear Mr. Davis:

The following comments are submitted on behalf of the International Brotherhood of Electrical Workers ("IBEW"), which is composed of approximately 665,000 members who work in a wide variety of fields, including utilities, construction, telecommunications, broadcasting, manufacturing, railroads and government throughout the United States and Canada.

These comments oppose the proposal to amend information collection request 1245-0003, as well as the Form LM-3 and LM-4 Labor Organization Annual Report instructions, to require filers of such reports to submit the reports electronically.

The IBEW represents hundreds of thousands of workers in the United States through 762 affiliated IBEW Local Unions. Of these 762 IBEW Local Unions, 320 or 42 percent file an LM-3 or an LM-4 Report.

By definition, filers of LM-3 and LM-4 Reports are small labor organizations. Many of these small labor organizations have no offices and no paid staff. The business managers of these small labor organizations often have full-time jobs elsewhere, leaving little time to spend on union business. And some of these business managers have no access to the internet at home, and the closest public access may be miles away. Not surprisingly, given these facts, of the 320 IBEW Local Unions that file LM-3 and LM-4 Reports, more than half file the reports by mail. It is simply erroneous to assume, with no factual basis, that requiring electronic filing will not pose a hardship on many of these small labor organizations.



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Rather than mandating electronic filing that will impose hardships on many of these small local labor organizations, it would be more appropriate for the Department of Labor to encourage labor organizations to voluntarily file LM-3 and LM-4 Reports electronically. This could be done through a targeted educational outreach effort by the Department of Labor's Regional Field Offices. Such an effort could also be accomplished in part through publication and distribution of a brochure or booklet setting out in simple and clear terms the resources and steps required to file LM-3 and LM-4 Reports electronically.

For the foregoing reasons, I urge the Department of Labor to continue to allow LM-3 and LM-4 reports to be filed either electronically or by mail.

Sincerely yours,

A handwritten signature in black ink, reading "Lonnie Stephenson".

Lonnie R. Stephenson
International President

LRS:jls