

# PUBLIC SUBMISSION

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**Docket:** DOL-2015-0005

Proposed Mandatory Electronic Filing for the Form LM-3 and LM-4

**Comment On:** DOL-2015-0005-0001

Proposed Mandatory Electronic Filing for the Form LM-3 and LM-4

**Document:** DOL-2015-0005-0011

Comment from Roosevelt Stewart, American Postal Workers Union

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## Submitter Information

**Name:** Roosevelt Stewart

**Address:**

1300 L St NW

Washington, DC, 20005

**Email:** RStewart@apwu.org

**Phone:** 202 842-4215

**Organization:** American Postal Workers Union

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## General Comment

I believe that requiring mandatory electronic filing of the LM-3 and 4 will be problematic for the smaller local unions. First it is presumed that local union leadership has access to the web or are familiar with using online registration and filing. Second, as the American Postal Workers Union has hundreds of local union with 50 members or less, this requirement would be onerous for these local officers. Third, because of the size of these local unions, many do not have laptops or desktop computers on with to file and store the reports and supporting documentation which will result in these officers having to store these records on their personal computers. The present system allows local unions the option to file electronically or manually file their reports and we believe that is the best procedure at this time.

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## Attachments

charts of locals and membership