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To: [ETA, OFLC Forms - ETA](#)
Subject: Proposed 790 changes
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There are positives and negatives to the proposed form changes. I will highlight a few of the negatives that should be revisited prior to publishing the new form.

The addendum 790-A a.6 does not seem to be formatted logically. It has a crop or activity at the top 1. and then the job duties below 2., which makes sense to have the job description following the actual crop. Where I find fault is 3a. through 3e. has no where to give a description. It makes more sense to have 3a. - 3e. at the top and the job descriptions below.

The Worksite addendum just does not possess enough room to list the amount of worksites normally associated with a fixed site employer let alone a Farm Labor Contractor. There are plenty of employers that possess 10-25 different sites where work is done. Unless the DOL decides to lump worksites into purely county site then this addendum will not suffice.

The fact that attachments will not be permitted is unacceptable. The ability to manipulate a word document to show piece rates, housing sites, or work sites is far superior than the ETA 790. The inability to utilize attachments would cripple an employer's ability to thoroughly describe all of the terms and conditions associated with the position being offered. The fact that the entire ETA 790 needs to be offered in the native language of the potential employee is reason enough to not have the no attachment rule. In Florida there are 3 languages spoken primarily among the domestic workforce. Having the ETA 790 and the attachments describing the terms and conditions in 3 separate languages enables the worker to apprised of the requirements with no misunderstandings.