



September 18, 2007

Ms. Hazel M. Bell,  
U.S. Department of Labor  
200 Constitution Ave., NW., Room S-3201  
Washington, DC 20210

Re: FR Doc. E7-14040

Ms. Bell:

The Buckeye Institute, a nonpartisan research and educational institute devoted to individual liberty, economic freedom, personal responsibility and limited government in Ohio, is submitting this in response to the Department of Labor's collection of comments regarding construction contractor wage rate data. Collecting accurate wage rate data is very important to how the Department of Labor sets prevailing wage rates and it is vital that the Department make every effort to avoid incomplete data collection. Having incomplete data could unfairly disadvantage certain firms looking to submit contract requests and deprive taxpayers of an opportunity to obtain the best deal in construction contracting.

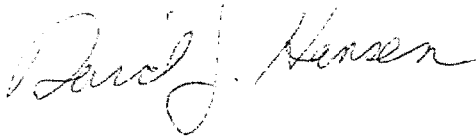
One of the main flaws of the current collection process, as the Buckeye Institute understands it, is that there is not a consistent collection of information from all sectors of the construction industry. That is, the Department only collects information from contractors that reply to its survey. This type of collection does not give a full picture of industry-wide wages in an area. Instead of merely relying on self-reported survey data, the Department should attempt to collect data from the entire construction industry. This will lead to a much truer picture of wage rates in any given locality.

It is the understanding of the Buckeye Institute that the Bureau of Labor Statistics uses a different survey methodology to obtain similar information. The Employment Standards Administration should consider using a similar methodology for its information collection. Determining a representative population of local contractors and obtaining wage data from this group would be preferable to merely relying on the self-reported wage rates given by those who reply to a survey.

Attempting to ensure the accuracy of wage rate surveys in this manner would be beneficial to both contractors but also to the taxpayer. In the end, the money for these construction projects is coming from the pockets of taxpayers. It is in their interest to ensure that prevailing wage rates are not artificially inflated due to an inaccurate wage rate survey. The Buckeye Institute urges you to consider changing your survey in this way in order to give taxpayers the best deal for their money.

Thank you.

Sincerely,

A handwritten signature in cursive script that reads "David J. Hansen".

David J. Hansen  
President