



December 3, 2010

Ms. Nora Kincaid
BLS Clearance Officer
Division Management Systems
Bureau of Labor Statistics
Room 4080,
2 Massachusetts Avenue, N.E.
Washington, D.C. 20212

**Traditional Values Coalition's Comments On
The Department of Labor's Request For Comments on the Proposed Revision of the
National Compensation Survey (1220-0164) --Domestic Partners Survey Question**

The Department of Labor has requested comment on the proposed addition of two questions to a National Compensation Survey. The questions deal with unmarried domestic partnerships – including whether or not businesses provide survivor benefits to unmarried partners as part of their benefits package. This survey will be given to local, state, and federal governments as well as to businesses.

The questions are found in NCS Form 04 5G [1] on page 27:

1. “Does your establishment offer health benefits to unmarried domestic partners? Of the opposite sex? Of the same sex?”
2. “As part of a defined benefit plan, does your establishment offer survivor benefits to unmarried domestic partners? Of the opposite sex? Of the same sex?”

The inclusion of these two questions has been listed as an “emergency,” yet there is no detailed explanation as to just why this is an emergency. The text of this request follows:

Why are we requesting Emergency Processing? Emergency clearance is being sought for the National Compensation Survey for the purpose of the addition of two questions on domestic partner benefits to the existing “Other Benefits” questions. The Department of Labor’s LGBT (Lesbian, Gay, Bisexual, and Transgender) roundtable and recent Congressional actions on the proposed Domestic Partnership Benefits and Obligations Act (HR 2517) have greatly increased the need for information on domestic partner benefits in both private industry and State and local governments. In order for BLS to produce data in 2011, NCS data collection of these questions must begin in September 2010 during the NCS collection quarter (which starts September 16, 2010).

Is this considered an emergency just because the DOL's LGBT (lesbian, gay, bisexual and transgender) roundtable says it is or because a piece of legislation has been introduced?

Why is the federal government asking these domestic partnership questions?

It is our belief that the Obama Administration's Department of Labor is attempting to subvert the Defense of Marriage Act (DOMA) passed in 1996, by using regulations to redefine the institution of marriage. The Federal Defense of Marriage Act (DOMA) defines marriage as a legal union between one man and one woman for legal purposes including all federal laws. Creating domestic partnerships undermines this law – a law passed with bipartisan support and signed into law by President Bill Clinton.

DOMA forbids the federal government from defining marriage as anything other than a one man, one woman union. A domestic partnership is a gay-created relationship that is the fraudulent equivalent of marriage. It is designed to subvert the definition of marriage and to gain marriage benefits for unmarried couples.

LGBT activists frequently use surveys to push their political agenda. Once answers are gathered from survey questions on domestic partner benefits, LGBT activists can use these answers to force businesses and governments to provide benefits to unmarried couples.

The claim will be that these entities are “discriminating” against unmarried LGBT couples by denying them the same benefits as married couples. This will have the effect of redefining marriage to mean anything that LGBT activists wish – in violation of DOMA.

President Obama knows that the American people and Congress do not support a repeal of DOMA, so he is using the Department of Labor to sneak a repeal of it through the back door. By treating unmarried couples as married, he is repealing a federal law by regulation.

Marriage will not only be redefined to include unmarried couples, it will include polyamorous relationships. LGBT (lesbian, gay, bisexual, transgender) activists are currently pushing for the normalization of polyamory (a relationship involving two or more individuals in a sexual relationship).

Consider these questions:

- How many people can be in a domestic partnership? (See Feldblum comment below.)
- Will governments or businesses be required to provide benefits to two or more people in a domestic partnership? (See Feldblum comment below.)
- How will a domestic partner prove that he or she really is one?
- How long does a person need to be a domestic partner before receiving benefits?
- Will the federal government normalize polyamory through this survey with future legislation or regulations?

Polyamory is supported by Chai Feldblum, the recess-appointed member of the Equal Employment Opportunity Commission (EEOC). Feldblum would be an influential force in requiring businesses and governments to provide marriage benefits to unmarried couples. She was so radical in her views that she couldn't be confirmed in the Senate.

Chai Feldblum is critical of traditional marriage and supports the idea that any number of individuals can live together in domestic partnerships – and should receive benefits. She supports

what she describes as a “wide array of non-marital intimate social structures” that can be considered as equal to man-woman marriage.

These two questions should be deleted from the survey. They have no relevance and will only be used by LGBT activists to undermine the institution of marriage and violate the intent of DOMA.

Unmarried relationships (whether homosexual or heterosexual) are not marriage. At a time when the national unemployment rate is now almost 10%, domestic partner benefits will cost governments/businesses more and more – and the cost will be passed on to the taxpayer or the consumer.

After his recent shellacking by the American voters, President Obama, in an attempt to demonstrate concern over deficit spending, has announced a two-year pay freeze for most federal employees starting in 2011. Yet, the DOL will impose new burdens and costs on businesses/government if it requires these entities to provide benefits to unmarried couples – potentially including polyamorous relationships.

If these domestic partner questions don't violate the letter of the law, they certainly violate the spirit.

This effort by the Obama Administration is nothing more than an effort to circumvent the law and lay the groundwork to make the same-sex partners of federal employees and business employees eligible for the same benefits as married couples.

Sincerely,

A handwritten signature in black ink that reads "Andrea S. Lafferty". The signature is fluid and cursive, with the first name "Andrea" and last name "Lafferty" clearly legible.

Andrea S. Lafferty
Executive Director

Traditional Values Coalition
139 C Street, SE
Washington, DC 20003
(202) 547-8570
www.traditionalvalues.org

see attachment on Feldblum comments