



October 15, 2018

US Department of Labor
Employment and Training Administration
Office of Foreign Labor Certification
Room 12-200
200 Constitution Ave NW
Washington, DC 20210

RE: H-2A Recordkeeping Requirement

To whom it may concern;

Thank you for requesting information in attempt to reduce paperwork and respondent burden as related to the H-2A recordkeeping requirement for open range production of livestock.

Current recording by ranchers of generalized data reflecting the time on and off of a range for a worker is currently not burdensome for employers of Western Range Association. This recorded information helps to differentiate open range production of livestock workers from other H-2A workers who have different pay scales and regulatory requirements.

The agency's estimates of the time that ranchers take to complete the record keeping is accurate.

Allowing ranchers to utilize their own recordkeeping methods and retaining the documents is the best and most efficient process to continue collecting this information. Changes to the current process would be burdensome to Western Range Association Ranchers.

Sincerely,

A handwritten signature in cursive script that reads 'Monica Youree'.

Monica Youree
Executive Director