

From: [Nate Riccardi](#)
To: [ETA, OFLC Forms - ETA](#)
Cc: [Keith Pabian](#)
Subject: Comment on proposed revisions: Form ETA-9142B (Appendix A)
Date: Monday, September 10, 2018 9:09:36 AM

Dear Sir or Madam,

Please find below a question/comment regarding the requirement of listing additional worksite information on the new, proposed Appendix A to Form ETA-9142B (per the publication in the Federal Register – 83 FR 45469).

Listing all possible worksites on the new Appendix A: currently, an H-2B employer is not required to list the specific addresses of all worksites on the ETA-9142B. Instead the employer can simply list a county/township or BLS area in Section F.c.7a. (without any additional information regarding the specific worksites), as long as all worksites fall within only one “area of intended employment.” However, if the proposed change is implemented requiring employers to list the specific address of all worksites, this change could have significant, negative and unanticipated consequences on a large segment of H-2B employers with transitory/changing worksites. Specifically, this applies to employers where the worksites are customer locations, such as moving companies, construction companies, catering companies, tent set-up companies, youth soccer coaching, and many others. In such cases, if an employer cannot list the specific address of all worksites, would they be precluded from using the H-2B program?

Please let me know if you have any questions regarding the above.

Thank you,
Nathan Riccardi

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