



July 29, 2019

Arthur F. Rosenfeld
Director
Office of Labor-Management Standards
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Re: RIN 1245-AA09 (Form T-1)

Dear Director Rosenfeld:

The Directors Guild of America (DGA) is a labor organization that represents nearly 18,000 Directors and members of the directorial team, including Unit Production Managers, Assistant Directors, Associate Directors, and Stage Managers, who work in film, television, commercials, news, sports, documentaries, and new media. We write to respond to the proposal to add a new reporting form, T-1, an annual financial report for trusts in which a labor organization is interested.

The DGA invests significant resources to ensure that we are accountable to our members and that our financial operations are transparent, responsible, and compliant with applicable laws. For this reason, we support the proposal to exempt from the new reporting requirement trusts organized as political action committees; trusts that meet the statutory definition of a labor organization and file a Form LM-2, LM-3, or LM-4; and trusts that are part of employee benefit plans that file a Form 5500 Annual Return/Report under the Employee Retirement Income Security Act of 1974 (ERISA). These exemptions are well-founded because existing reporting requirements ensure transparency and accountability to members. Elimination of these exemptions would require labor organizations to divert funds away from servicing members in order to prepare duplicative reporting.

With this filing, the DGA supports the filing of the AFL-CIO, which lays out in detail the reasons for exempting trusts that file Form 5500. Thank you for the opportunity to submit these comments.

Sincerely,

Celeste Drake
Executive in Charge of Government Affairs
Directors Guild of America