To the EO:

This letter is a follow up to go on record regarding the evidence I presented during our E.O. 12866 meeting. My company provides H2A services to employers who reside west of the Mississippi and primarily in the southeast. We have been in business for 18 years and have had the opportunity to gain a true boots on the ground perspective as we regularly interact in the field with both the growers and the workers. We have an intimate knowledge of how most farms operate when it comes to labor demands. Whether it is a small three man farm or one that employs over a thousand workers, our clients comprise this mosaic of growers with serious agricultural labor demands.

The current methodology used to calculate the AEWR creates a wage that is not indicative of true wages paid on farms in the southeast. Unfortunately the FLS does not disaggregate the wages paid hourly for the daily tasks of weeding or setting irrigation and those of harvesting that are paid by piece rates. Most workers on a farm are paid $9.50-10.00 per hour for all work on a farm with the exception of harvest and driving large GPS oriented tractors or combines. Whether it is packing produce, spraying weeds, driving the field trucks or the planting of the crop, the wage does not change until harvest time. During harvest when a piece rate wage is implemented you will have workers make upward of $15-22.00 an hour depending on their efficacy and ability. The averaging of these paid wages, coupled with bonuses paid at the end of a harvest depending on the market of the commodity, creates a grossly inflated wage in the AEWR.

The disaggregation of the jobs performed on the farm with the intent to pay a separate wage for each task is beyond illogical, especially when utilizing OES wages that are reflective of non-agricultural jobs. The fact that a farm manager according to OES should be paid $44 an hour will make the vast majority of farmers sell their own operation and search for the mythical $44 an hour farm manager position. Does the manager at Enterprise rental cars make the same as a manager at a tech firm? I hope that you will take into consideration how grave the consequences will be to American Agriculture with the supposed good intention of disaggregating of jobs on the farm and how inaccurate the proposed wages are from reality.