

Dear Ms. Gagliardi,

Please accept these comments on behalf of the Transportation Learning Center (the Center), a national not-for-profit organization committed to working with labor and management to provide the public transportation industry with high quality training solutions for the front-line workforce.

Working with transit agencies and their local unions to implement and expand Registered Apprenticeship for the 80 percent of the transit employees who run and maintain the vehicles and related equipment is core to the Center's mission. The Center strongly believes that much of the strength of Registered Apprenticeship comes from the joint buy-in from both labor and management and that "worker's voice" is not only an asset to these programs, but is an essential element of effective training. Going beyond effective training, workers' voice represents an ideal that brings dignity and democratic participation to the job.

The Center is deeply concerned by what it views as a "low-road" approach to apprenticeship in the proposed Industry-Recognized Apprenticeship Programs (IRAPs). The IRAP model has all the potential and, indeed, incentives to build apprenticeship programs with significantly less than rigorous standards as compared with Registered Apprenticeship. Rather than requiring sponsors to meet high standards to receive recognition from the Department of Labor, IRAPs would be allowed to receive accreditation through private third-party organizations, or Standards Recognition Entities (SREs) approved by the Department of Labor. But what are the standards for determining who can set standards? IRAPs could descend too quickly and easily to being the chosen path for employers seeking some recognition for low-wage jobs offering little advancement. This erosion of standards would certainly lead to serious issues around safety and health, both for front-line technicians working around heavy machinery and high-voltage, as well as for the riding public that depends on public transportation in everyday life.

On a related point, the Center is troubled by proposals to exempt apprentices from key labor protections, including wage progression, payment of prevailing wages, and equal opportunity employment to underrepresented groups. Rules requiring that apprentices earn higher wages as they gain skills—one of Registered Apprenticeship's biggest benefits, becoming weakened or eliminated, would be detrimental to the career pathways skilled workers rely on to earn family-sustaining wages and enter the middle class. Additionally, apprenticeship programs are already highly unequal by gender and race. The provision shifting existing rules from prohibiting discrimination based on race, sex, or other characteristics, to rules requiring sponsors to ensure their outreach and recruitment, would likely make that worse.

Registered Apprenticeships benefit to employers, workers and the public. The joint apprenticeship programs in construction have the longest track record and the most success in delivering high-quality training that leads to well-paying careers. Employers in that system, value the apprenticeships and pay a premium wage because they know that the apprentices and journey workers earn that premium. Elsewhere in the world, across many sectors of the economy, employers also value good apprenticeship programs and pay workers well for completing those apprenticeships. The United States can learn from these successes by supporting a stronger system of registered apprenticeships.

Respectfully,

Jack Clark

Executive Director

Transportation Learning Center