



NAKNEK ELECTRIC ASSOCIATION, INC.

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May 5, 1995

Tom Cashen, Commissioner
Alaska Department of Labor
P. O. Box 21149
Juneau, AK 99802-1149

Dear Commissioner Cashen:

By this letter I formally submit, as comments of Naknek Electric Association on the proposed changes to Regulations of the Department of Labor, a three-ring binder containing five sections and comprised of voluminous correspondence and research on the electric construction and maintenance technique known as Rubber Gloving.

The proposed regulatory changes would delegitimize the use of Rubber Gloving in Alaska. This delegitimization is occurring at the specific request of the IBEW Local 1547 ostensibly to "protect the interests" of its members. Local 1547 has presented vociferous objection to the use of this technique even though they have provided absolutely no tangible evidence that it is unsafe or undesirable.

Rubber Gloving is a routine work technique very widely utilized in all regions of North America. It is one of the many highly specialized tools of the trade used by trained professionals in the execution of their daily tasks. Thousands of linemen, many of whom are IBEW members, would be appalled should this practice be prohibited by state or federal law.

Very highly qualified individuals (including the Safety Director of the IBEW International Office) composed the panel that drafted the recently adopted changes to the Code of Federal Regulations governing work place safety. This panel did not see fit to ban Rubber Gloving in the United States. By what measuring stick has the Alaska Department of Labor determined Rubber Gloving to be unsafe?

Commissioner, NEA has inadvertently become a central figure in the Rubber Gloving controversy that has now raged for over four years. We are committed to defending the reputation of this common work technique and not limiting the options of the many Alaskan professionals that have utilized it for decades.

Sincerely,

Meera Kohler
General Manager