



May 6, 2015

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Ave. SE, W12-140
Washington, DC 20590-0001

RE: Docket No. DOT-OST-2015-0013; Geographic-Based Hiring Preferences in Administering Federal Awards

Dear Sir/Madame:

The Wisconsin Transportation Builders Association (WTBA) opposes the U.S. Department of Transportation's (DOT's) proposed withdrawal of the ban on utilization of local hiring preferences on federal-aid highway and transit projects.

WTBA represents nearly 130 heavy/highway contractors and 150 associate members who supply materials and services to those contractors. Our membership performs the vast majority of the Wisconsin Department of Transportation's (WisDOT) competitively bid construction work.

Our workforce, to a large degree has to be a mobile workforce. The job a contractor has this month in their home city of Madison may not be the same job they have next month in Milwaukee. This policy will restrict where employees may work and therefore is creating barriers to employment in an industry already struggling with finding workers.

The federal government should be working with the states and contractors to find ways to educate individuals on the career opportunities in the construction industry. They should not be mandating contractors to hire workers based on the address on their driver's licenses.

In addition, a residency restriction forces contractors to employ workers who may not be trained or have little understanding of what a career in construction entails. This causes greater inefficiencies in projects and the likelihood of being penalized for not completing the project on time. The result will be higher project costs, less work and, therefore, less employment opportunities. In addition, having workers who are not adequately trained or qualified adds significantly to the safety risks on projects and puts their lives, their co-workers lives and the lives of the travelling public at risk.

You have received comments from several other state associations like WTBA. In those comments, you will see that the actual experience in some of the states that have tried this has been a disaster. The hiring goal is not achieved, contractors are penalized and a good working relationship between the contractor and local government is now adversarial. There are ways we can all work together to recruit workers into this industry and hopefully have long and productive careers. Issuing mandates to hire people based on their residency is not the solution.

Thank you for your time and consideration.

Sincerely,



Patrick Goss
Executive Director