

Again let me express our appreciation for this opportunity to state our position. We would be happy to suggest specific language to carry out our recommendations and to discuss this matter further at your convenience.

Yours truly,

EUGENE W. ROBBINS,
Managing Director, Contractors Division.

FLORIDA ROAD BUILDERS' ASSOCIATION, INC.

Florida Road Contractors are turning unskilled and underprivileged laborers into skilled road equipment operators under a bootstrap operation launched recently by the Florida Road Builders' Association.

The unique program will turn out considerable numbers of skilled workers in a very short time and at a fraction of the cost of ordinary training programs.

Contractors were pestered with an ever-increasing shortage of equipment operators for years. J. L. Cone, Jr., President of Cone Bros. Contracting Company of Tampa and Vice President of FRBA, proposed a statewide training program more than two years ago but an attempt to work it out with federal authorities was unsuccessful.

Late in 1967, however, Alex Gaither, regional officer of the Equal Employment Opportunity Commission, revived the idea and the proposal was resubmitted.

This time, the effort was successful and a contract was signed under which 120 men would be trained as equipment operators in the following 12 months.

The longest training period for any man is only 26 weeks, with some running only 13 to 18 weeks. Maximum cost to the taxpayer is only \$136 per trainee and this is for supervisory personnel. The actual training cost is borne by each individual contractor.

Ed Medard, Vice President of Bay Dredging and Construction Company and Chairman of the FRBA Labor and Wage Rate Committee, said that the program is aimed at "creating an adequate supply of machine operators in Florida."

"This program is designed to train disadvantaged workers who might not have any other opportunity to learn a skill," the veteran road contractor said.

"It will also aid highway contractors in complying with federal non-discrimination and equal opportunity laws and regulations.

"It will enable the contractor to train employees at rates less than rates paid to skilled operators on Federal Interstate road building contracts.

"Heretofore, a contractor has been required to pay trainees and skilled operators the same rate of pay. This has prohibited such training programs in the past," Medard said.

In operation, the program consists of individual contractors selecting trainees from their own labor force or from unemployed workers, choosing from a list recommended by the Florida State Employment Service.

Training is offered in 13 job categories, including highway construction carpenter and bridge carpenter, and operators of the following types of equipment: backhoes, bulldozers, cranes, derricks or draglines, heavy earthmovers, front end loaders both over and under one cubic yard, motor graders, pile drivers, finish rollers, and tractors over and under 80 horsepower.

The contractors have been enthusiastic over the shortness of the training period, which will give them early aid with a long standing shortage of qualified workers.

The cost is only about one-fourth of the average on the job training program, and is being supervised by the U.S. Bureau of Apprenticeship and Training.

The program is unique among states and is therefore being eyed closely by federal agencies and other states with an eye toward copying it. Tennessee is reported to be about ready to install a similar program.

MARCH 21, 1968.

MR. EDWARD C. SYLVESTER, JR.,
Director, Office of Federal Contract Compliance,
U.S. Department of Labor, Washington, D.C.

DEAR MR. SYLVESTER: We appreciate the opportunity to file the following comments on the Proposed Permanent Regulations of the Office of Federal Contract Compliance in addition to those filed in my letter of March 11, 1968, con-