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DEPT OF CONSUMER PROTECTION
OFFICE OF THE COMMISSIONER

May 29, 2008

The Honorable Jerry Farrell, Jr.
Commissioner
Department of Consumer Protection
165 Capitol Avenue
Hartford, CT 06106

Dear Commissioner Farrell:

Thank you for this opportunity to comment on the Department of Consumer Protection's proposed regulation on Well Drilling.

There are two substantial concerns for me—the worksite and the hiring ratio language. Both are contained in the new Section 25-128-60e, Apprentice Driller.

1. The proposed language would allow an apprentice to perform work without supervision. This is in direct violation of the CTDOL regulations for apprenticeship and training programs which states “. . . the worksite ratio shall be not less than one full-time journey person instructing and supervising the work of each apprentice in a specific trade”.
2. The proposed language would allow a one-to-one hiring ratio. As you know, proposals to create a one-to-one hiring ratio have always been actively opposed by the CTDOL. To grant such a ratio by regulation would be very detrimental to the apprenticeship program. There were legislative attempts to do so as recently as when the General Assembly Session ended this May. The hiring ratio in the trades is one-to-one for the first apprentice and one-to-three for each additional apprentice.

I respectfully request that you delete from the new Section 25-128-60e the language which would allow an apprentice to work without supervision and which would create a one-to-one hiring ratio.

As you know, the Labor Commissioner, with the advice and guidance of the State Apprenticeship Council, is responsible for the standards for apprenticeship training. The

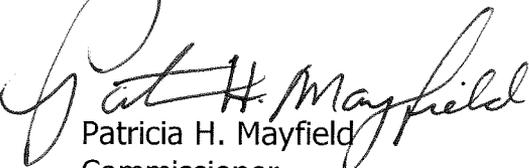


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worksite and hiring ratios are two of the key standards which provide for successful completion by the apprentice, thus providing the skilled employee pool needed by the employer community.

It is important to note that the CTDOL has two well driller program sponsors in the apprenticeship program. Their programs are operated with the minimum one-to-one worksite ratio and the one-to-one, one-to-three hiring ratio.

Sincerely,



Patricia H. Mayfield
Commissioner