



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS.**

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EDWIN D. HILL
International President

LINDELL K. LEE
International
Secretary-Treasurer

March 24, 2010

Ms. Ana A. Mazzi
Deputy Associate Director
Center for Workforce Relations and
Accountability Policy
U.S. Office of Personnel Management
1900 E Street, N.W., Room 7H28
Washington, D.C. 20415-8200

Dear Ms. Mazzi:

The International Brotherhood of Electrical Workers (IBEW) makes the following comments on the Proposed Rule: Part 731 RIN 3206-AL90:

- This proposed rule is premature – As stated in the briefing held by OPM on December 11, 2009, the OPM does not know how many employees will be affected by this change. Without knowing the number of investigations involved, it would be impossible to make an intelligent comment on the timeframe of any re-investigations.
- This proposal is premature – As stated at the December 11, 2009, OPM briefing, the OPM staff present were unable to say what the nature or extent of any re-investigations would be. Without knowing the nature and extent of any re-investigation, it would be impossible to make an intelligent comment on the timeframe of any such re-investigation.
- This proposal is premature – Without knowing the number of employees involved and the nature and extent of any re-investigation, it is impossible to know the resources and finances needed to accomplish the tasks proposed, and, therefore impossible to make an intelligent comment on what a reasonable timeframe for any re-investigation should be.
- The IBEW has seen time and again abuses by agencies in the authority to conduct suitability and security investigations.

The IBEW recommends the following concerning this proposed rule:

- Withdraw the proposed rule until such time as all parameters as stated above are known.



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- Once the proposed rule is re-issued, the OPM should include established stricter guidance and over-site of the agencies use of the authority to determine public trust positions and the re-investigation of these positions.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "Edwin D. Hill", is written above the printed name.

Edwin D. Hill
International President

EDH:plj

