



New York State
**PUBLIC EMPLOYEES
FEDERATION, AFL-CIO**

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February 13, 2008

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Larry King
Chief for Division of Reports, Disclosure & Audits
Office of Labor-Management Standards
200 Constitution Avenue, NW: Suite N5616
Washington, D.C. 20210

Dear Mr. King:

I write to confirm our January 31, 2008 telephone conversation regarding the LM-30 reporting requirements.

Specifically, I asked you whether an individual who, pursuant to a collective bargaining agreement, conducted union activities during regularly scheduled work-time and was paid for that time by their employer, must count the hours spent on union activities toward the yearly 250-hour threshold for reporting, if the work-time spent on union activities was later made-up by the employee. I explained that it is not unusual for professional employees to make-up work-time spent on union activities by working outside of regular work hours, including evenings and weekends. You consulted with your supervisor and reported to me that if the employee made-up the time within a "reasonable amount of time," then the employee should not count it toward the 250-hour threshold. I asked you whether making-up the time within the same pay period would qualify as a "reasonable amount of time," and you answered that it would.

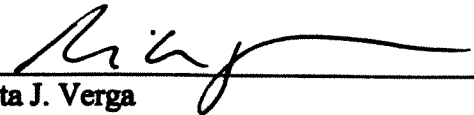
Mr. Larry King
February 13, 2008
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Please advise me immediately, in writing, if this is your understanding of our discussion, as we plan to share this information with our union's membership.

Again, thank you for your assistance.

Sincerely,

William P. Seamon
Attorney for the New York State
Public Employees Federation, AFL-CIO

By: 
Rita J. Verga
Of Counsel

RJV/mab

cc: William P. Seamon
Lisa M. King
David Strom, General Counsel, AFT
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Bcc: OGC File No. 7029-P

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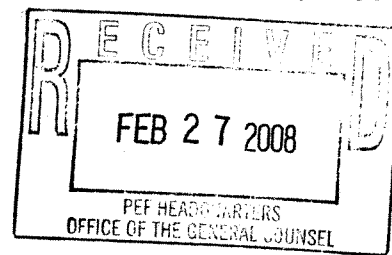
U.S. Department of Labor

Employment Standards Administration
Office of Labor-Management Standards
Washington, D.C. 20210



February 25, 2008

Ms. Rita J. Verga
Associate Counsel
Public Employees Federation, AFL-CIO
1168-70 Troy-Schenectady Road
P.O. Box 12414
Albany, New York 12212-2414



Dear Ms Verga:

This letter serves to confirm my responses in your letter dated February 13, 2008, regarding our January 31, 2008, conversation pertaining to LM-30 reporting requirements, and our discussion of those issues.

Regards

A handwritten signature in black ink, appearing to read "Larry J. King".

Larry J. King
Chief, Division of Reports,
Disclosure and Audits