



STATE OF WASHINGTON
DEPARTMENT OF LABOR AND INDUSTRIES

Prevailing Wage
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July 15, 2013

Mark H. Sutton, RCDD
Principal
The Integrated Technologies Group, Inc.
P.O. Box 1267
Bothell, WA 98041-1267

Re: Telecommunication Technicians and Electronic Technicians Prevailing Wage Scopes of Work and Electrical Licensing Laws

Dear Mr. Sutton:

Thank you for your April 11, 2013 letter about cable systems for computer networks and telephone systems. You note and discuss the specific systems identified in the Electronic Technicians scope of work description, [WAC 296-127-01322](#). You ask about the scope of work descriptions and their corresponding pay categories for public works projects and suggest that there are “no cable installations that can be made by a Telecommunication Technician.” Your letter mentions specific electrical licensing law and rule categories and what they allow for purposes of licensing.

The state’s prevailing wage law is chapter [39.12 RCW](#). The administrative rules for the prevailing wage law are in [chapter 296-127 WAC](#). RCW [39.12.020](#) requires prevailing wages on public works.

This is a determination of the Industrial Statistician regarding coverage of the referenced work under Washington’s prevailing wage laws and is made pursuant to RCW [39.12.015](#). See the attached document, “*Prevailing Wage Determination Request and Review Process*.”

In your April 11, 2013 letter you note some inconsistencies between the electrical licensing categories and the guidance our program previously provided you on prevailing wage categories for the same work. The electrical licensing law is [chapter 19.28 RCW](#). [Chapter 296-46B WAC](#) has administrative rules for electrical safety standards, administration, and installation. The Integrated Technologies Group, Inc. is an electrical contractor with a limited energy license under [chapter 19.28 RCW](#), [WAC 296-46B-920](#): 06 (limited energy system). A copy of the electrical licensing rule, [WAC 296-46B-920](#), with that licensing category is attached. That electrical licensing rule uses the term “scope of work” in its title.

The term “scope of work” is also used in prevailing wage law for the descriptions for prevailing wage trade and occupation classifications. You reference information from our guidance document titled: “Distinctions between the Prevailing Wage Scope of Work Descriptions for Electronic Technicians and Telecommunication Technicians.” A copy of that document (reformatted from its prior version) is attached.

You express concern that the systems you install may include work that is specific to the Electronic Technicians prevailing wage scope of work and therefore your company cannot use the prevailing rate of wage for Telecommunication Technicians for that work. This concern is noted, but the guidance we previously provided you regarding those prevailing wage categories is correct. Although, clearly, there is a limit to the application of the Telecommunication Technicians scope of work, I do not believe that, as you asserted, there is no possible work under the prevailing rate of wage for Telecommunication Technicians.

You note that the prevailing wage scope of work description for Telecommunication Technicians, [WAC 296-127-01378](#), differs from the definitions in [chapter 19.28 RCW](#) and [WAC 296-46B-920](#). However, the prevailing wage categories are not based on the electrical licensing categories nor are the electrical licensing categories based on the prevailing wage categories. Each of these regulations has its own application.

The prevailing wage scope of work descriptions are used to distinguish which of the prevailing rates of pay properly apply to the work they describe. The prevailing wage scope of work does not regulate who may perform the work (only the wage for the work). Moreover, the prevailing wage scopes of work do not control any aspect of the electrical licensing law.

I understand the confusion that can occur when two different types of regulations divide the same broad classifications of work into categories that do not correspond to each other. For the electrical licensing categories and the prevailing wage categories, those variations are an historic fact. Their use of similar or identical terminology makes thinking separately about those distinct regulations vital to the correct understanding and use of each standard.

As a design expert in the telecommunications market, you likely have a broad concept of what might be telecommunications work. Given the diverse regulations, it is necessary to recognize each more specific area of work and the distinct compartments that each individual regulation addresses. The “Distinctions between the Prevailing Wage Scope of Work Descriptions for Electronic Technicians and Telecommunication Technicians” document Ramona Christensen-Russell previously provided to you, and which you reference in your letter, is our attempt to provide guidance to contractors in identifying specific electrical prevailing wage categories. Although those categories vary from the licensing law and may vary from the industry concept of a large universe of telecommunications, they provide a means for identifying the correct wage in particular circumstances. The prevailing wage scopes do not affect or control those unrelated categories such as electrical licensing categories.

There are many prevailing wage scopes of work, including some that apply to certain electrical work. The prevailing wage electrical scopes include Electronic Technicians ([WAC 296-127-01322](#)), Outside Telephone Line Construction ([WAC 296-127-01377](#)), Telecommunication Technicians ([WAC 296-127-01378](#)), Power Line Construction Electricians ([WAC 296-127-01320](#)), Inside Wireman Electrician ([WAC 296-127-01323](#)), and Electrical Fixture Maintenance Workers ([WAC 296-127-01325](#)).

The Telecommunication Technicians prevailing wage scope of work is often referred to as the “inside telephone line” construction scope. Generally, the wage rates that correspond to that scope of work are used for work performed on telephone (voice over distance) and data (bits and bytes) systems located *inside the point of demarcation* within a building, but only if the system is not a system specifically assigned to the Electronic Technicians wage rates by [WAC 296-127-01322](#). The attached guidance document on distinctions between those scopes explains those differences.

The Outside Telephone Line Construction prevailing wage scope is used for telephone (voice over distance) and data (bits and bytes) systems work *outside the point of demarcation*, but only if the system is not a system specifically assigned to the Electronic Technicians wage rates by [WAC 296-127-01322](#).

The Electronic Technicians prevailing wage scope ([WAC 296-127-01322](#)) does identify work on certain low-voltage systems that specifically must use the Electronic Technicians’ prevailing rate of wage:

- Radio
- Television
- Recording systems
- Paging
- Intercommunication
- Public address
- Wired music
- Clocks
- Security
- Surveillance
- Mobile radio
- Fire alarm
- Burglar alarm

As you can see, the specific facts of a situation are vitally important to the correct prevailing wage answer. Knowing that the only issue regulated by prevailing wage law is the *wage* in the work described, please take another look at the guidance document on the distinctions between the Telecommunications Technicians prevailing wage scope of work and the Electronic Technicians prevailing wage scope of work. I think you will find the document is useful for that limited purpose of identifying which prevailing rate of wage should be used.

Your letter includes some specific scope of work questions. Here are the answers based on this guidance document:

Q: Which designation specifically includes the installation of Ethernet data network communications cabling inside a customer owned or leased environment?

A: There could possibly be more than one designation depending on the facts.

The Telecommunication Technicians prevailing wage rate applies to installation of systems that have data communications inside buildings so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic Technicians scope of work, or
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW.

If the work is data communications work and is on systems specifically identified in the Electronic Technician's scope of work, use the Electronic Technicians prevailing rate of pay.

Q: Which designation includes the installation of owner owned campus distribution of voice and Ethernet data cabling over copper or fiber optic cable running through a customer owned duct bank in an outside plant environment that is inside the point of demarcation that marks the end of work for the Outside Telephone Line Construction scope of work?

A: There could possibly be more than one designation depending on the facts.

The Telecommunication Technicians prevailing wage rate applies to installation of systems that have data communications inside buildings and, within a customer owned campus, between those campus buildings so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic Technicians scope of work,
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW, or
3. Specific to the Inside Wireman Electrician's scope of work.

If the work is data communications work and is on systems specifically identified in the Electronic Technician's scope of work, use the Electronic Technicians prevailing rate of pay.

If the work is on fiber optic cable in conduit or interduct raceways, use the Inside Wireman Electrician's prevailing rate of pay.

Q: Since a twisted pair cable plant that is the media used for voice communications can also "potentially" be used for television, paging, intercommunications, public address, wired music, and surveillance systems, what scope of work is specifically allowed under the Telecommunications Technician Wage Classification?

A: The Telecommunication Technicians prevailing wage rate applies to installation of systems that have data communications inside buildings so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic Technicians scope of work, or
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW, or is
3. Fiber optic cable in raceways that is specific to the Inside Wireman's Electrician's scope of work.

Q: When a cable installation is installed which will support both data network and voice connectivity inside an owner owned or leased environment, what prevailing wage labor classification is applicable?

A: The Telecommunication Technicians prevailing wage rate applies to installation of systems that have data communications inside buildings and, within a customer owned campus, between those campus buildings so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic Technicians scope of work,
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW, or
3. Specific to the Inside Wireman Electrician's scope of work.

If the work is data communications work and is on systems specifically identified in the Electronic Technician's scope of work, use the Electronic Technicians prevailing rate of pay.

If the work is on fiber optic cable in conduit or interduct raceways, use the Inside Wireman Electrician's prevailing rate of pay.

Q: Will the department be providing any additional proactive communications to the Electrical, Limited Energy and Telecommunications contractors to further clarify the application of these prevailing wage work descriptions with regards to the Telecommunications and Electronic Technicians?

A: Yes. In addition to posting documents such as this determination on our web site for everyone's reference, we do a significant amount of outreach and education work on the prevailing wage law. L&I would welcome your suggestions for industry associations to contact for possible outreach and education.

You suggest including the work specific to the Electronic Technicians scope of work in the Telecommunication Technicians scope of work. I understand and appreciate that the current scopes of work which are the subject of this discussion could benefit from an update more consistent with current technology. My hope is to have resources available to dedicate to that

Mark Sutton
July 15, 2013
Page 6 of 6

purpose in the near future. Currently, however, each of the referenced bodies of work was surveyed for wages based on its present descriptions. If, at some future date, those scopes of work were combined, then a new survey would establish the rate.

I very much appreciate your interest in prevailing wage compliance and the opportunity to address your concerns. I hope the information I've provided is helpful in clarifying the relationship between electrical licensing law and prevailing wage scopes of work. If you have further questions or concerns, please let me know.

Sincerely,



L. Ann Selover
Industrial Statistician/Program Manager
Ann.Selover@Lni.wa.gov
(360) 902-5330

Attachments

Prevailing Wage Determination Request and Review Process

RCW 39.12.015 is the basis for requesting a determination, since it provides:

All determinations of the prevailing rate of wage shall be made by the industrial statistician of the department of labor and industries.

If you disagree with a determination the industrial statistician provides, WAC 296-127-060(3) provides for a review process:

(3) Any party in interest who is seeking a modification or other change in a wage determination under RCW [39.12.015](#), and who has requested the industrial statistician to make such modification or other change and the request has been denied, after appropriate reconsideration by the assistant director shall have a right to petition for arbitration of the determination.

(a) For purpose of this section, the term "party in interest" is considered to include, without limitation:

(i) Any contractor, or an association representing a contractor, who is likely to seek or to work under a contract containing a particular wage determination, or any worker, laborer or mechanic, or any council of unions or any labor organization which represents a laborer or mechanic who is likely to be employed or to seek employment under a contract containing a particular wage determination, and

(ii) Any public agency concerned with the administration of a proposed contract or a contract containing a particular wage determination issued pursuant to chapter [39.12](#) RCW.

(b) For good cause shown, the director may permit any party in interest to intervene or otherwise participate in any proceeding held by the director. A petition to intervene or otherwise participate shall be in writing, and shall state with precision and particularity:

(i) The petitioner's relationship to the matters involved in the proceedings, and

(ii) The nature of the presentation which he would make. Copies of the petition shall be served on all parties or interested persons known to be participating in the proceeding, who may respond to the petition. Appropriate service shall be made of any response.

If you choose to utilize this review process, you must submit your request within 30 days of the date of the applicable industrial statistician's determination or response to your request for modification or other change. Include with your request any additional information you consider relevant to the review.

Direct requests for determinations, and for modification of determinations via email or letter to the prevailing wage industrial statistician:

L. Ann Selover
Industrial Statistician/Program Manger
Department of Labor & Industries
Prevailing Wage
P O Box 44540
Olympia, WA 98504-4540
Ann.Selover@Lni.wa.gov

Prevailing Wage Determination Request and Review Process

Direct requests via email or letter seeking reconsideration (redetermination) by the assistant director to:

Elizabeth Smith, Assistant Director
Department of Labor & Industries
Fraud Prevention and Labor Standards
P O Box 44278
Olympia, WA 98504-4278
Elizabeth.Smith@Lni.wa.gov

Direct petitions for arbitration to:

Joel Sacks, Director
Department of Labor & Industries
P O Box 44001
Olympia, WA 98504-4001

If you choose to utilize this arbitration process, you must submit your request within 30 days of the date of the applicable assistant director's decision on reconsideration (redetermination). Submit an original and two copies of your request for arbitration to the Director personally, or by mail. The physical address for the Director is 7273 Linderson Way, SW, Tumwater, WA 98501.

WAC 296-127-061 also contains the following provisions regarding petitions for arbitration:

In addition, copies of the petition shall be served personally or by mail upon each of the following:

- (a) The public agency or agencies involved,
 - (b) The industrial statistician, and
 - (c) Any other person (or the authorized representatives of such person) known to be interested in the subject matter of the petition.
- (2) The director shall under no circumstances request any administering agency to postpone any contract performance because of the filing of a petition. This is a matter which must be resolved directly with the administering agency by the petitioner or other party in interest.
- (3) A petition for arbitration of a wage determination shall:
- (a) Be in writing and signed by the petitioner or his counsel (or other authorized representative), and
 - (b) Identify clearly the wage determination, location of project or projects in question, and the agency concerned, and
 - (c) State that the petitioner has requested reconsideration of the wage determination in question and describe briefly the action taken in response to the request, and
 - (d) Contain a short and plain statement of the grounds for review, and
 - (e) Be accompanied by supporting data, views, or arguments, and
 - (f) Be accompanied by a filing fee of \$75.00. Fees shall be made payable to the department of labor and industries.

The Scope of Work Descriptions

WAC 296-127-01322

Electronic technicians.

(1) For the purpose of the Washington state public works law, chapter 39.12 RCW, electronic technicians install, operate, inspect, maintain, repair, and service:

- (a) Radio, television and recording systems and devices;
- (b) Systems for paging, intercommunication, public address, wired music, clocks, security and surveillance systems and mobile radio systems; and
- (c) Fire alarm and burglar systems.

(2) When installed for the specific purpose of carrying low voltage wiring, the work identified in subsection (1) of this section includes:

- (a) Installing unlimited lengths of nonmetallic conduit;
- (b) Installing incidental metallic conduits of no longer than ten feet nor larger than one inch;
- (c) Pulling wiring through conduit, except as provided in subsection (3) of this section; and
- (d) All the cleanup required in connection with electronic technician's work.

(3) The work identified in subsection (1) of this section does not include pulling wiring through conduit that exceeds ten feet in length for the purpose of installing fire alarm systems.

[Statutory Authority: Chapter 39.12 RCW and RCW 43.22.270, 09-19-118, § 296-127-01322, filed 9/22/09, effective 11/1/09. Statutory Authority: Chapter 39.12 RCW, RCW 43.22.270 and 43.22.051, 00-15-077, § 296-127-01322, filed 7/19/00, effective 7/19/00.]

WAC 296-127-01378

Telecommunication technicians.

For the purpose of the Washington state public works law, chapter 39.12 RCW, telecommunications technicians install, inspect, maintain, repair and service telecommunication systems.

The work includes, but is not limited to:

(1) Main distribution frame (MDF). The distribution frame where the permanent outside lines entering a building terminate and the subscriber's line multiple cabling and trunk multiple cabling originate. It is usually located on the ground floor of a building.

(2) Intermediate distribution frames (IDF). Distribution frames which provide flexibility in allocating the subscriber's number to the line or equipment in the office which is to be associated with the particular line. These frames are located on each floor of a building.

(3) Blocks. Subpanels. They are connecting devices where large feed cables terminate at the distribution frames.

(4) Common equipment or key service unit. Consists of a backboard assembly, an equipment mounting frame, for connecting external telephones and Pacific Northwest Bell lines.

(5) Instruments, terminals, sets. Communications equipment at either end of a circuit. Equipment at a subscriber's or user's terminal including such items as telephones.

(6) Ancillary equipment. Add-on equipment such as bells, buzzers, speakerphones, headsets, automatic dialers,

Distinctions Between the Prevailing Wage Scope of Work Descriptions for Electronic Technicians and Telecommunication Technicians

recorders, etc.

- (7) Telephone cable.
 - (a) Network channel service cable owned by the telephone companies.
 - (b) Riser cables between floors of a building.
 - (c) Distribution cables installed on each floor of a building in the floor or the ceiling.
 - (d) Inside wires between the telephone and the connection to the distribution cable.

[Statutory Authority: Chapter 39.12 RCW, RCW 43.22.270 and 43.22.051, 00-15-077, § 296-127-01378, filed 7/19/00, effective 7/19/00.]

Scopes of Work and the Prevailing Rate(s) of Pay

Prevailing Wage scope of work descriptions are adopted to describe the different trades and occupations that perform work subject to the Washington State prevailing wage law, Chapter 39.12 RCW. Under the provisions of RCW 39.12.015, the Industrial Statistician establishes the prevailing rate of pay.

Electrical Scopes of Work for Inside Work

Certain scopes of work for electrical work have some commonality and some important distinctions. For example, an Inside Wireman Electrician (WAC 296-127-01323) may perform the work described in the Inside Wireman Electrician scope, work that happens to fully include the smaller universes of work described in the Electronics Technician scope of work (WAC 296-127-01322) and the Telecommunications Technicians scope of work (WAC 296-127-01378).

Specific Work Called Out in a Scope of Work Description

Often scopes will identify certain work that is specifically performed by that particular scope of work. For example, the Electronic Technician scope of work identifies specific systems that are the work of an Electronic Technician:

- Radio
- Television
- Recording systems
- Paging
- Intercommunication
- Public address
- Wired music
- Clocks
- Security
- Surveillance
- Mobile radio
- Fire alarm
- Burglar alarm

Distinctions Between the Prevailing Wage Scope of Work Descriptions for Electronic Technicians and Telecommunication Technicians

Public work on those specific systems requires, at a minimum, the Electronic Technician scope of work and its corresponding prevailing rate of pay for public work.

Although the prevailing wage scope of work descriptions are not derived from and do not necessarily parallel the electrical licensing laws, it may be useful to note certain systems that cannot be done by a Telecommunication Technician under those electrical licensing laws. Please remember the prevailing wage law and scope of work descriptions often will have further limits or parameters.

The electrical licensing laws do not allow Telecommunication Technicians to work on these systems:

- fire protection signaling systems
- intrusion alarms
- access control systems
- patient monitoring systems
- energy management control systems
- industrial and automation control systems
- HVAC/refrigeration control systems
- lighting control systems
- stand-alone amplified sound or public address systems

The Electronic Technicians Scope of Work (WAC 296-127-01322)

The Electronic Technicians scope is for work on limited energy systems that are not voice over distance systems unless that voice function is combined with one or more of the low voltage systems such as those identified in the Electronic Technicians scope of work:

- Radio
- Television
- Recording systems
- Paging
- Intercommunication
- Public address
- Wired music
- Clocks
- Security
- Surveillance
- Mobile radio
- Fire alarm
- Burglar alarm

Distinctions Between the Prevailing Wage Scope of Work Descriptions for Electronic Technicians and Telecommunication Technicians

Public work on these low voltage systems requires, at a minimum, the Electronic Technician scope of work and its corresponding prevailing rate of pay for public work.

Data communications (specifically bits and bytes but not transmission of voltage) were not addressed when the Electronic Technicians scope was drafted. Electronic Technicians can install systems that have data communications inside buildings.

For specific details, please see the scope of work description(s).

The Telecommunication Technicians Scope of Work (WAC 296-127-01378)

The Telecommunication Technician scope of work is for voice over distance communications and is often referred to as the “inside” Telecommunications scope since the scope is written for those voice over distance communication systems inside the point of demarcation that marks the end of the work for the Outside Telephone Line Construction scope of work (WAC 296-127-01377).

Telecommunication technicians can install systems that have **voice over distance communications inside buildings** so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic technician scope of work, or
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW.

Data communications (specifically bits and bytes but not transmission of voltage) were not a factor when the Telecommunication Technicians scope was drafted. The Telecommunication Technicians can install systems that have **data communications inside buildings** so long as the system does not contain any possible systems or functions that are:

1. Specific to the Electronic Technicians scope of work, or
2. Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW.

For specific details, please see the scope of work description(s).

Questions?

Prevailing Wage questions may be addressed to the Department of Labor & Industries at:

PW1@Lni.wa.gov or 360-902-5335



Integrated Technologies Group, Inc.

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L. Ann Selover
Industrial Statistician
Prevailing Wage Program Manager
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Olympia, WA 98504-4540

April 11, 2013

Hello Ms. Selover,

My company is a Limited Energy Electrical Contractor (O-6) which performs installation of cable systems for computer networks and telephone systems in commercial buildings, educational campuses and industrial sites. It has come to my attention that the Department has been in the process of further clarifying the Scope of Work for the Electronic and Telecommunication Technicians. I have been forwarded the Scope Distinctions Document as the classifications that we have used historically may no longer be accepted during the Intent and Affidavit review process. In an effort to insure that we are listing the correct wage classifications, I'm looking for additional understanding as to how the classifications are applied.

It is noted in the Scope Distinction Document that Data communications were not a factor when the Telecommunications Technician or Electronic Technician scopes were drafted in WAC 296-127-1322 and 296-127-1378. The document specifically states that Electronic Technicians can install cabling for Data communications. However, the document also states that the Telecommunication Technicians can install systems that have data communications inside buildings so long as the system does not contain any possible systems or functions that are: 1) Specific to the Electronic Technician scope of work, or 2) Not allowed as telecommunications under the electrical licensing law, Chapter 19.28 RCW. Under RCW 19.28.400 (13) (a) Telecommunications systems encompass all forms of information generation, processing, and transporting of signals conveyed electronically or optically within or between buildings, including voice, data, video, and audio. The work is further clarified in paragraph (b) and paragraph (c) specifically excludes much of the work which is defined under the Electronic Technician WAC 296-127-01322. As a result, it appears that Telecommunications Technicians are allowed to install data network communications cabling systems as they are classified under RCW 19.28.400 as Telecommunications Installations and are not listed under the Electronic Technician Scope of Work under WAC 296-127-01322. It would seem that according to state law, Telecommunications Technicians can perform data communications systems installations.

Conversely to the above, since our industry has evolved into telecommunications systems utilizing converged technologies based upon new generations of the original telephone twisted pair cable, virtually all systems noted in the Electronic Technician Scope of Work can be run over the same cable that is installed for voice or data communications. Since the Telecommunications Technician Scope states that the installed system cannot contain "any possible systems or functions" that are specific to the Electronic Technician scope of work, there are consequently no cable installations that can be made by a Telecommunication Technician. This requirement negates any application of the Prevailing Wage classification of Telecommunications Technician.

In a recent Affidavit review it was noted that for cable run in an outside plant campus environment the specified scope of work designation was assigned to the Electronic Technician. The referenced WAC of 296-127-01377 states that Telecommunication Technician is for "communications systems inside the point of demarcation that marks the end of work for the Outside Telephone Line Construction scope of work". In a campus environment, the Outside Telephone Line Construction ends at the Entrance Facility for the building or campus and the provisioner does not install cabling or connectivity throughout the tenant or owner premises. In the case of a subscriber owned campus, the campus cable plant is not provided or installed by the utility whether it's inside the structure, between telecommunications distribution frames or between buildings whether inside or outside. The

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case may be made that this system is identified in 296-127-01378 (1) where the work includes "The distribution frame where the permanent outside lines entering a building terminate and the subscriber's multiple cabling and trunk multiple cabling originate." This designation along with the verbiage in paragraph (2) Intermediate distribution frames reference the connectivity that is distributed throughout the subscriber premises. The Electronic Technician scope has no similar reference to this distribution system.

This is a complex issue which includes wage scope of work descriptions made by the Industrial Statistician that as stated in some instances "are not derived from and do not necessarily parallel electrical licensing laws". It seems that our industry needs a more concise description of the wage determinations that specifically address data and voice communications whether it is over copper or fiber optic cable as well as the installation of cabling inside a customer owned premises whether it falls inside a building or in interconnecting duct banks. Although it is understood that it is not required for the application of scope descriptions, it would appear that the already established description of Telecommunications scope of work and systems in RCW 19.28.400 would be the most logical application to an updated Telecommunications Technician Wage classification.

Specific scope of work designation questions derived from the above include:

- Which designation specifically includes the installation of Ethernet data network communications cabling inside a customer owned or leased environment?
- Which designation includes the installation of owner owned campus distribution of voice and Ethernet data cabling over copper or fiber optic cable running through a customer owned duct bank in an outside plant environment that is inside the point of demarcation that marks the end of work for the Outside Telephone Line Construction scope of work?
- Since a twisted pair cable plant that is the media used for voice communications can also "potentially" be utilized for television, paging, intercommunications, public address, wired music, and surveillance systems, what scope of work is specifically allowed under the Telecommunications Technician Wage classification?
- When a cable installation is installed which will support both data network and voice connectivity inside an owner owned or leased environment, what prevailing wage labor classification is applicable?
- Will the department be providing any additional proactive communications to the Electrical, Limited Energy and Telecommunications contractors to further clarify the application of these prevailing wage work descriptions with regards to the Telecommunications and Electronic Technicians?

In addition to responses to the above questions, I would sincerely appreciate any clarification you can provide as to how the Department will move forward with these distinctions so that as an industry we can accurately price our work, pay our employees and report the same to the State.

Thank you very much for your consideration.

Mark H. Sutton, RCDD
Principal

The Integrated Technologies Group, Inc.