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June 1, 2012

Ms. Susann Morrison
Executive Assistant to the Deputy Secretary for UC Programs
Room 1721B, Labor and Industry Building
651 Boas Street
Harrisburg, PA 17121

RE: Comments on Proposed Rulemaking for Unemployment Compensation claimants' active work search requirement.

Dear Ms. Morrison:

On behalf of the thousands of employers represented by the Pennsylvania Chamber of Business and Industry, I write to provide comments on a Proposed Rulemaking related to work search requirements for unemployment compensation claimants (Pennsylvania Bulletin, Vol. 42, No. 18, May 5, 2012).

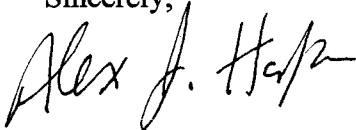
The PA Chamber supported the enactment in Act 6 of 2011 of a work search requirement for unemployment compensation (UC) claimants and generally supports the Proposed Rule. We would, however, make the following observations and suggestions and respectfully request that they be considered as you proceed with the rulemaking:

- 1) Subsection (d)(1) provides that a claimant may limit his applications to positions that pay wages "similar" to those earned prior to unemployment. The rule does not define the word "similar" which could create ambiguity and allow claimants to reject positions with wages only nominally less than wages earned prior to unemployment.
- 2) Subsection (d)(1) further provides that a claimant may limit his applications to positions that are "within a 45 minute commuting distance or a commuting distance that is generally accepted in the claimant's labor markers, whichever is greater." However, the Proposed Rule simply states "within a generally accepted commuting distance." Again, this lack of specificity could create a work search requirement that is conducive to circumvention.
- 3) Subsection (e)(1) and the Proposed Rule exempts from the work search requirement any claimant who "is a member of a union that has a hiring hall." This exemption appears inconsistent with the objectives of the work search requirement: assisting employers with open positions to identify potential applicants; providing unemployed individuals with access to a credible and comprehensive inventory of job openings; and helping to ensure that UC beneficiaries are indeed actively searching for work. Abdicating these

responsibilities to an organized labor entity with virtually no oversight does not seem to be in the best interest of the UC program, employers looking for job applicants or, most importantly, the unemployed worker. Certainly it would be reasonable to assume that a typical union hiring hall does indeed work diligently to help put its members back to work, just as it would be reasonable to assume that the typical unemployed worker is already actively searching for a job. Yet this requirement was deemed necessary to provide a more efficient work search process and to account for those abusing the system by not actively looking for a job while collecting UC benefits. Accordingly, it should apply to all unemployed workers, regardless of their union status.

Thank you for the opportunity to provide comments on this Proposed Rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex J. Halper". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alex Halper
Manager, Governments Affairs