



THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF TRANSPORTATION



CHRISTOPHER D. CLEMENT, SR.
COMMISSIONER

JEFF BRILLHART, P.E.
ASSISTANT COMMISSIONER

January 23, 2012

Wage & Hour Administrator
United States Department of Labor
200 Constitutional Avenue, N.W.
Washington, D.C. 20210

Dear Sir or Madam;

The New Hampshire Association of General Contractors is appealing the most current Davis-Bacon wage rate determinations. The New Hampshire Department of Transportation is supportive of this appeal request and shares the concerns expressed by NHAGC that the rates for several classifications are significantly higher than the previous rates.

NHDOT shares the Department of Labor's goal of establishing fair and equitable wage rates. In a number of cases as NHAGC has documented, some rates doubled or tripled over the previous wage rates. We question whether such substantial increases are reasonable. It would appear that the wage rate determinations may be based on limited data and are not truly representative of the prevailing wage rates. We are also concerned that, in a small state such as New Hampshire, the county-by-county wage rate determination may exacerbate this situation. A broader look may be more representative and yield more reasonable results.

Due to this concern about the significantly higher wage rates in some instances, we suggest that it would be appropriate to rely on the previous established wage rates until this appeal can be addressed. We ask for consideration to continue to use the previous established wages rates until a final determination is made with respect to the appeal.

Thank you for your consideration. NHDOT will assist in any way we can in reviewing and addressing these concerns.

Sincerely,

William J. Cass
Director of Project Development

cc: J. Brillhart, J. Ankenbrock, NHAGC