



June 26, 2012

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Rick Ruble
General Counsel
Indiana Department of Labor
402 West Washington Street, Room W195
Indianapolis, IN 46204

Dear Mr. Ruble:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 12-190 and proposed by the Indiana Department of Labor ("DOL"). The proposed rule adds 610 IAC 11 to establish procedures for filing and adjudication of complaints of violations of Indiana's Right to Work statute.

The economic impact statement prepared by the DOL indicates that only businesses that are the subject of a complaint alleging a violation of the right to work law would be subject to the proposed rule. It states that the number of these businesses is unknown because no data is available for the number of small businesses that operate under a collective bargaining agreement. The DOL states that the proposed rule provides businesses that are the subject of a complaint with the option to respond in writing to a complaint, but there is no requirement to do so. The economic impact statement further states that in the absence of such an administrative rule the only recourse for an alleged violation of the right to work law would be a civil action, and concludes that any minor costs incurred by small businesses as a result of the proposed rule would be insignificant compared to costs incurred through the court system.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 234-3997 or eshields@iedc.in.gov.

Regards,

A handwritten signature in black ink that reads "Eric P. Shields". The signature is written in a cursive, flowing style.

Eric P. Shields
Policy Director