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June 4, 2008

Hon. Charlotte Ponticelli
Deputy Undersecretary for International Affairs
U. S. Department of Labor #S-5317
Washington, D. C. 20510

**Re: Information to Assist in the Development of a List of Goods from Countries
Produced by Child Labor or Forced Labor in Violation of International Standards**

Dear Ms. Ponticelli:

Thank you for your hearing on May 28, 2008.

We would have like to have testified, but we had not received either the April 28 notice of the hearing nor the December 27 notice of procedural guidelines. Your office was well aware of our interest, inasmuch as we had two relevant complaints accepted regarding abusive child and forced labor in China.

The first complaint in 2001 regarded the production of fireworks by forced child labor in China. A revealing incident in this enormous industry was the explosion at an elementary school that was a forced-labor factory for fireworks in which 42 people were killed. The Department of Labor, after two years of doing nothing on its own, dismissed the complaint for lack of evidence. The second complaint in 2007 regards the production in China by forced and/or child labor of bricks, tiles, coal, foundry products, chemicals, cotton, grape products, toys, and fireworks. This complaint has apparently been languishing, inasmuch as the DOL has not contacted us further.

Considerable improvements can be made in order to yield timely and effective results. In our experience with both complaints, we found that the DOL conducted no investigation on its own. It did not follow up on any of the news articles or other sources, even though they provided excellent, on-scene accounts. The DOL did not task labor attaches in China to investigate. The DOL did not ask the Department of State to investigate. The DOL did not ask the several U. S. intelligence agencies to investigate, such as the CIA, NSA, and so on. The DOL did not ask the authoritative experts at the Laogai Research Foundation under Harry Wu.

Not only should the DOL be required to investigate the substance of the complaints, the Department of State (including the labor attaches) and the U. S. intelligence agencies should be tasked directly to investigate. DOL should be required to advertise or otherwise put out public notices of the cases under investigation. DOL should maintain a standard mailing/emailing list for interested parties.

You will find enclosed our 2001 and 2007 complaints with related materials.

We urge DOL to get on the side of free labor worldwide, and to penalize effectively any help to forced or child labor overseas. If we can't trust DOL to care about free labor overseas as it impacts goods and services coming into this country, we cannot realistically expect DOL to care about free labor at home.

Sincerely,

Carl Olson
Chairman
State Department Watch

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Enclosures