

September 24, 2009

LM File No. 512-396

Mr. Peter Nuhn
Weather Service Employees
National Headquarters
601 Pennsylvania Avenue, NW
Washington, DC 200042602

Dear Mr. Nuhn:

This is in response to your email to the Office of Labor-Management Standards (OLMS), in which you expressed frustration at your inability to properly attach electronic signatures to the Weather Service Employees National Headquarters' Form LM-2 report for the fiscal year ending December 31, 2008. Your email was referred to me for review for a possible hardship exemption from electronic filing.

Please note that to request a continuing hardship exemption, the labor organization must apply in writing, and that application must be mailed to the following address:

U.S. Department of Labor
Employment Standards Administration
Office of Labor-Management Standards
200 Constitution Avenue, NW
Room N-5609
Washington, DC 20210-0001

The request for the continuing hardship exemption should include, but not be limited to, the following: (1) the justification for the requested time period of the exemption; (2) the burden and expense that the union would incur if it was required to make an electronic submission; and (3) the reasons for not submitting the report(s) electronically.

OLMS will notify you in writing whether the request is granted or denied. If denied, the labor organization must file the report(s) in electronic format. If the request is granted, the labor organization must submit the manually signed report in paper format.

If you have any further questions regarding the application for a continuing hardship extension, please call 202-693-0123 and reference your labor organization's LM file number. Additionally, if you have not already done so, please contact the OLMS electronic forms help desk at 1-866-401-1109 for help in resolving the issues with your digital signatures.

Sincerely,

Andrew R. Davis, Chief
Division of Interpretations
and Standards

cc: Larry King, Chief, Division of Reports, Disclosure & Audits