



UA Sprinkler Fitters Local 669 Joint Apprenticeship and Training Committee

7050 OAKLAND MILLS ROAD • SUITE 100 • COLUMBIA, MARYLAND 21046
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Charles W. Ketner
Executive Director of
Education and Training

May 20, 2025

Via Email (nevadasac@labor.nv.gov)

Toni Giddens
State Apprenticeship Director
Office of the Labor Commissioner
3340 West Sahara Avenue
Las Vegas, NV 89102

Re: Summit Fire & Security – Proposed Registered Apprenticeship Program

Dear Ms. Giddens:

On behalf of the Road Sprinkler Fitters Local Union 669 Joint Apprenticeship and Training Committee (“JATC”), I write to object to the registration of the proposed apprenticeship program submitted by Summit Fire & Security. As provided below, it is the JATC’s position that Summit Fire & Security’s request for approval of its proposed registered apprenticeship program should be denied.

Background of the JATC’s Registered Apprenticeship Program

The JATC administers a registered apprenticeship program that operates in 48 states, including Nevada. The JATC’s apprenticeship program has been registered and approved by the United States Department of Labor since 1953, and the JATC’s standards were most recently approved by the Nevada State Apprenticeship Council in 2015. Members of the JATC are appointed by the United Association Road Sprinkler Fitters Local 669 and the National Fire Sprinkler Association.

The JATC’s registered apprenticeship program provides high quality training in the sprinkler fitter trade to over 3,600 apprentices across the country. In the state of Nevada, we train sprinkler fitter apprentices across the entire state. Apprentices in our program receive at least 10,000 hours of on-the-job training and 720 hours of related instruction over approximately five years. Apprentices receive training in all aspects of the sprinkler fitter trade, including installation, testing and maintenance of sprinkler fitter systems and component parts.

Objections to Summit Fire & Security’s Request for Approval of a Registered Apprenticeship Program

The JATC understands that Summit Fire & Security has submitted a request to register an apprenticeship program in the occupation of Pipe Fitter-Sprinkler Fitter and Fire Protection Systems Inspector. The program proposed by Summit Fire & Security would offer training in the same trade and purports to teach the same skills as the JATC’s approved program. It is therefore a parallel program to the registered apprenticeship program administered by the JATC.

The standards submitted by Summit Fire & Security include two separate work process schedules and related instruction outlines: one for Pipe Fitter-Sprinkler Fitter (O*NET-SOC Code 47-2152.00) and one for “Fire Protection Systems Inspector” (O*NET-SOC Code 51-9061.00). The program proposed by



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Summit Fire & Security does not meet the requirements of Nevada law and therefore Summit's request for approval and registration of the program should be rejected.

Summit Fire & Security's request should be rejected because the proposed apprenticeship program requires the completion of fewer hours of on-the-job learning than the JATC's approved registered apprenticeship program. Under Nevada law, the State Apprenticeship Council may not approve a proposed apprenticeship program "unless the program requires the completion of at least as many hours of on-the-job learning, or the demonstration of at least the same number and quality of skills, or both, as applicable, as all existing approved and registered programs in the relevant skilled trade." NRS 610.142(2). Since the proposed program is for a trade in the construction industry, it must use a time-based approach. NRS 610.11(1)(b). Therefore, Summit Fire & Security's request for approval of its apprenticeship program should not be approved unless it requires the same number of on-the-job learning as all existing programs in the trade.

As stated above, the JATC's program requires at least 10,000 hours of on-the-job training and 720 hours of related instruction. Conversely, the work process schedules and related instruction outlines submitted by Summit Fire & Security reflect only 8,000 hours of on-the-job training required for its Pipe Fitter-Sprinkler Fitter program and only 4,000 hours for its Fire Protection Systems Inspector apprenticeship. Therefore, Summit Fire & Security's request for approval of this program should be denied.

Summit Fire & Security's request for approval for a Fire Protection Systems Inspector apprenticeship program should also be denied because this is not an apprenticeable occupation. Nevada law requires a program, in order to be eligible for registration, to be in an apprenticeable occupation as defined in 29 C.F.R. § 29.4. NRS 610.144(1)(a). This section of the federal regulations defines an apprenticeable occupation as one which is specified by industry and which must, among other things, "be clearly identified and commonly recognized throughout an industry." 29 C.F.R. § 29.4. Nevada law provides that the Council may consider, among other things, the opinions of experts provided by interested parties, and dictionaries of occupational titles, when determining whether a proposed program should be approved or rejected. NRS 610.144(3). The JATC is willing and able to provide expert testimony establishing that "Fire Protection Systems Inspector" is not a separate occupation in the sprinkler fitter trade. Moreover, the leading dictionary of occupation titles, O*NET, does not support Summit Fire & Security's request for approval for a registered apprenticeship program in this trade. The O*NET-SOC code listed by Summit Fire & Security refers to the occupation of Inspector, Tester, Sorter, Sampler and Weigher. This occupation is described as one in which one inspects and tests "non-agricultural raw material or processed, machined, fabricated, or assembled parts or products for defects, wear, and deviations from specifications." O*NET Online at <https://www.onetonline.org/link/summary/51-9061.00>. These are not the tasks performed by an inspector of fire protection systems.

The JATC is also willing and able to provide testimony establishing that the industry recognizes a fire protections system inspector to need the same skills and industry knowledge as a sprinkler fitter. The Department of Labor's dictionary of apprenticeship occupations similarly recognizes the occupation of sprinkler fitter to include work activities such as those needed to "inspect, examine or test installed systems or pipelines, using pressure gauge, hydrostatic testing, observation or other methods." Department of Labor, "Apprenticeship Occupations: Plumbers, Pipefitters, and Steamfitters", at <https://www.apprenticeship.gov/apprenticeship-occupations/listings?occupationCode=47-2152.00>.



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The work process schedule and related instruction outline submitted by Summit Fire & Security also reflects training that goes beyond merely inspecting fire protection systems. Many of the course descriptions include study on testing and maintenance of fire protection systems, not just inspection of them. Units 4 through 8 listed on Appendix A for the “Fire Protection Systems Inspector” program show that apprentices would learn inspection, testing and maintenance of water-based systems, fire alarm systems, fire suppression systems, fire pumps, and systems in healthcare and similarly governed facilities. These are the same skills taught to apprentices in the JATC’s existing and approved apprenticeship program.

Accordingly, Summit Fire & Security’s proposed “Fire Protection Systems Inspector” program is not for an apprenticeable occupation, and should be rejected on that basis. Even assuming that the proposed Fire Protection Systems Inspector program is for a recognized and apprenticeable occupation, it teaches the same skills and trade as the JATC’s program. Approval of this program should not be granted because it requires substantially fewer on-the-job training hours than that required in the JATC’s program, which has already been approved in the same trade. Approval of Summit Fire & Security’s proposed program would be contrary to the requirements of Nevada law, and would undermine the health, safety and security of people within the state by registering a training program that requires substantially less training than is currently required by approved programs in the same trade.

As noted above, the JATC is willing and able to provide expert opinions or any other information that would be helpful to the Council in considering this request. The JATC thanks you for your attention to this important matter, and appreciates the opportunity to review and comment on the proposed apprenticeship program.

Sincerely,

Charles Ketner

Executive Director of Education and Training