

views contribute to the FTAA process, as stipulated in the Ministerial Declaration of San Jose:

• Be sent directly to the Chair of the Committee of Government Representatives on the Participation of Civil Society, at the

following address: c/o Tripartite Committee (Ref. Civil Society), Economic Commission for Latin American and the Caribbean (ECLAC), 1825 K Street NW, Suite 1120, Washington, D.C. 20006, Fax: (202) 296-0826, e-mail: socs@eclac.org.

5. The Commission will prepare its next report to Ministers on the basis of submissions determined to conform with paragraph 4 of this invitation and that are received up to September 30, 2000.

FTAA—COMMITTEE OF GOVERNMENT REPRESENTATIVES ON THE PARTICIPATION OF CIVIL SOCIETY

Cover Sheet

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Country(ies)/Region(s)	U.S.A.		
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ISSUES ADDRESSED (CHECK ALL THAT APPLY)

Agriculture		Subsidies, Antidumping and Countervailing Duties	
Competition Policy		Civil Society	X
Dispute Settlement		Electronic Commerce	
Government Procurement		Smaller Economies	
Intellectual Property Rights		The FTAA Process	X
Investment		Other:	
Market Access			
Services			
Executive Summary—2 pages maximum—(see Open Invitation):			

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DEPARTMENT OF TRANSPORTATION

Office of the Secretary

[OST Docket No. OST-2000-7538]

Notice of Test Plan for Determining Potential for Interference from Ultra-Wideband Devices (UWB) to Global Positioning System (GPS) Receivers; Review and Comment

AGENCY: Office of the Secretary, Department of Transportation.

**ACTION:** Notice.

**SUMMARY:** Since the potential for interference from certain ultra-wideband (UWB) parameters has been determined through preliminary analyses and tests, the Department of Transportation has sponsored a more rigorous test to evaluate the potential for interference to Global Positioning System (GPS) receivers from UWB devices. The Department invites comments on this test plan.

**DATES:** Comments should be submitted in written form July 24, 2000.

**ADDRESS:** Send comments to: Department of Transportation, Office of

the Secretary Radionavigation & Positioning Staff, P-7, Room 10315, 400 Seventh Street, SW., Washington, DC 20590 Attn: GPS-UWB Comments.

**FOR FURTHER INFORMATION CONTACT:** Sally L. Frodge, (202) 368-4894.

**SUPPLEMENTARY INFORMATION:** The Federal Communications Commission (FCC) is considering placing UWB devices under Part 15 of the FCC Regulations under Title 47 of the Code of Federal Regulations and modifying these rules accordingly. The FCC released on May 11, 2000, a Notice of Proposed Rule-Making (NPRM), "In the Matter of Revision of Part 15 of the

COMMENTS OF THE  
INTERNATIONAL ASSOCIATION OF MACHINISTS  
AND AEROSPACE WORKERS, AFL-CIO, CLC  
IN RESPONSE TO THE  
OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE  
NOTICE OF INVITATION FOR PUBLIC COMMENTS  
FROM FTAA COMMITTEE OF GOVERNMENT REPRESENTATIVES  
ON THE PARTICIPATION OF CIVIL SOCIETY

**EXECUTIVE SUMMARY**

The International Association of Machinists and Aerospace Workers (IAM) represents over 700,000 workers in the United States and Canada. IAM members work in a variety of industries including manufacturing, aerospace, transportation, shipbuilding and repair, woodworking, and automotive, just to name a few. Our members have been directly and indirectly affected by trade agreements and as a result, pursuant to the above-reference notice in the U.S. Federal Register, we welcome the opportunity to submit our comments on what we believe to be, among other things, some of the fundamental procedural and substantive flaws of the proposed Free Trade Area of the Americas (FTAA) negotiation process, with a particular focus on civil society.

Like many other organizations, the IAM has raised several objections when past trade agreements have been negotiated. Among our many concerns is the continual refusal to adequately recognize and incorporate what is commonly referred to as effective and enforceable "internationally recognized labor standards" into the core provisions of these trade agreements. For example, against our protest, the North American Free Trade Agreement (NAFTA) was implemented without adequate provisions to ensure that signatories to the agreement recognize, adopt, and effectively enforce internationally recognized labor standards. Sadly, instead of incorporating core labor standards into NAFTA, "side agreements" were executed. At the time we argued in various public forums that the side agreements represented woefully inadequate mechanisms for ensuring the recognition and effective enforcement of internationally accepted labor standards.

If anything can be learned from the experience of NAFTA, it is that treating labor standards as separate issues from those considered in the core of such an agreement will create fundamental flaws. Indeed, the notion that fundamental issues raised by labor and other similarly-oriented organizations are reviewed by a committee separated from the core aspects of negotiations is entirely inadequate. It represents that those negotiating the FTAA have learned little, if anything, from the failures of NAFTA.

Treating labor standards as separate from the heart of negotiations in NAFTA is one of the major causes of NAFTA's abysmal failure. Contrary to what some claimed NAFTA would

achieve, working conditions and living standards have not improved in any of NAFTA's three signatory countries. NAFTA has exacerbated wage stagnation and, in some cases, added to a downward pressure on real wages in the United States and Canada. In addition, good paying manufacturing jobs have been shifted to Mexico and there has been a real weakening of workers' bargaining power in both countries. At the same time that more manufacturing jobs have moved to Mexico, conditions for the Mexican worker have also declined.

Given the inadequacies based on the ineffectiveness of NAFTA, the IAM agrees with other organizations that such important rights cannot be relegated to separate committees on "civil society." The negotiating parties must recognize, understand and implement, real labor clauses calling for effective enforcement of internationally recognized core labor standards.

Universal adherence to these standards is not only a moral and ethical issue, it is also an economic issue that goes to the very heart of the world's trade policies.

Other issues in the FTAA negotiations also require serious attention. Some of them include: the acknowledgment that the Investment Group recognize the necessity of incorporating various restrictions on the flow of capital that has most often led to the disruption of many of the world's economies. Still other issues involve market access and demands by some countries for transfer of technology and production in return for market access.

The IAM objects to the current FTAA negotiating process. It is a woefully inadequate method for gathering and presenting the real concerns that workers have with respect to FTAA. Moreover, until the negotiators from all potential signatory countries recognize that effective and enforceable, internationally recognized labor standards must be included in the core provisions of any proposed agreement, the FTAA negotiation process -- as well as any document that ultimately comes out of the process -- will be fatally flawed.