

Buten, Elizabeth C - ETA

From: Alma Canlas <alma.canlas@starmarianasair.com>
Sent: Wednesday, February 11, 2026 5:30 PM
To: ETA, OFLC Forms - ETA
Subject: Comment on OMB Control Number 1205-0534 – Practical Utility of ETA-9142C Work Schedule Fields

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To the Office of Foreign Labor Certification,

I am submitting comments regarding the Information Collection Request for the CW-1 Application for Temporary Employment Certification (OMB Control Number 1205-0534).

Our organization regularly files ETA-9142C applications for operational airline positions that are governed by the Federal Aviation Regulations (FARs), which establish crew duty and rest limitations within which operators design work schedules based on operational demand.

While the ETA-9142C functions effectively for traditional fixed-schedule roles, the work schedule section requiring fixed workdays, specific daily hours, time-in/time-out entries, and a set number of hours per week does not reflect the realities of aviation operations subject to duty-time and rest constraints. Operational schedules are not structured around consistent daily hours or standard workweeks but are built around flight rotations and regulatory safety limits. As currently structured, the form requires rigid entries that do not accurately represent these work patterns and necessitates supplemental narrative explanations to clarify actual working conditions.

Transportation employers often use non-traditional scheduling models under different federal labor frameworks, highlighting the need for flexible scheduling fields.

We respectfully suggest that ETA consider incorporating flexible scheduling options, such as variable or rotational schedules, average weekly hours, or industry-appropriate alternatives for operational roles governed by federal safety regulations. These changes would improve the practical utility and accuracy of the information collected while reducing respondent burden, consistent with the goals of the Paperwork Reduction Act.

Thank you for the opportunity to provide comments on this information collection.

Sincerely,

Sincerely,

Alma G. Canlas
Executive Vice President
STAR Marianas Air, Inc.

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