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From: Fox, John
Sent: Friday, August 25, 2006 1:54 PM
To: 'FCP-NPRM-04-VETS@dol.gov'
Subject: Is VETS correct that Contractors must currently report " Recently Separated Veterans" on the VETS 100 Report?

Mr. Wilson:

The Preamble to the VETS Tuesday August 8, 2006 Notice of Proposed Rulemaking re "Annual Report From Federal Contractors" recites in the second paragraph of the Summary that: ..."VEVRAA required...contractors to report....and recently separated veterans".

What regulation so currently requires the reporting on the VETS 100 Form of "Recently Separated Veterans" ? I do not think there is one. Rather, I think your August 8, 2006 proposed regulation is the rulemaking which first speaks to reporting of Recently Separated Veterans (especially since the JVA created this species of veteran). Your August 8, 2006 Notice is designed, of course, to implement the JVA for the first time.

Perhaps the confusion arises (unless I am terribly confused) because the VETS 100 Report currently *allows* contractors to *voluntarily* report Recently Separated Veterans. (One must read the instructions on the back side of the VETS 100 Report two or three times before one understands that reporting of Recently Separated Veterans is not mandatory). Please advise. Thanks....JCFox

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