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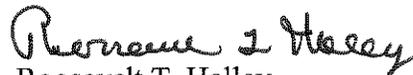
Gordon Burke
Director
Office of Grants and Transition Programs
U.S. Department of Labor
200 Constitution Avenue, NW
Room S-1312
Washington, DC 20210

Dear Mr. Burke:

The South Carolina Employment Security Commission appreciates the opportunity to comment on the new proposed rule for "Priority of Service for Covered Persons", which includes Veterans and Eligible Spouses.

Our Comments are attached.

Sincerely,


Roosevelt T. Halley
Executive Director

Enclosures
ES-7

South Carolina is dedicated to providing prompt, effective and courteous service for veterans and eligible persons. We continue to enforce priority service and programs in accordance with statutes and regulatory guidance.

South Carolina agrees with the current definition of *covered persons*. As stated in 38 U.S.C. 4211, the term "eligible veteran" means a person who has "served on active duty for a period of more than 180 days...." The proposed rule of 38 U.S.C. 101 sets no limit on time of service to determine whether or not a person is a veteran to qualify for priority of service.

This proposed change would place an undue hardship on this state that is experiencing personnel and budgetary challenges. The time burden estimated by USDOL is 155,449 hours and the cost associated with implementation is zero dollars. South Carolina will not incur any significant costs implementing the changes for reporting; however we are concerned about the time associated with the data collection.

South Carolina continuously reinforces the systems we have in place to ensure priority of service is provided to veterans and eligible persons, as well as insuring that all customers are receiving assistance in our offices. Implementation of a structured reporting system may shift time away from providing customers with services to data collection. This shift of focus could adversely affect services provided to our veteran and eligible person customers.

We appreciate the opportunity to provide comments on the proposed rule covering priority of service for covered persons. South Carolina will continue to strive to provide the best possible service to our nation's veterans.