



September 25, 2023

Jessica Looman
Principal Deputy Administrator
Wage and Hour Division
Department of Labor
Room S-3502
200 Constitution Avenue, N.W.
Washington, DC 20210

RE: Extension Request for Notice of Proposed
Exemptions for Executive, Administrative, Professional, Outside Sales, and Computer
-AA39)

Dear Principal Deputy Administrator Looman:

The Partnership to Protect Workplace Opportunity (PPWO) and the 107 undersigned organizations write to you to request a 60-
above-referenced notice of proposed rulemaking in order to provide the regulated community with sufficient time to analyze and respond to t
changes to the overtime pay exemptions for executive, administrative, professional, outside sales, and computer employees.

PPWO is a coalition of a diverse group of associations, businesses, and other stakeholders representing employers with millions of employees across the country in almost every industry. Formed in 2014, the Partnership is dedicated to advocating for the interests of its members in the regulatory debate on changes to the Fair Labor Standards Act
members believe that employees and employers alike are best served with a system that promotes maximum flexibility in structuring employee hours, career advancement opportunities for employees, and clarity for employers when classifying employees.

The proposed rulemaking includes a nearly 55% increase in the minimum salary threshold and automatically updates the threshold every three years. These are significant changes that will have a massive impact on the economy and millions of current and future workers. Additional time is needed in the comment period to allow the regulated community to analyze the rulemaking, fully assess the potential impact the changes will have on the economy, business operations, and workers, and develop comprehensive comments.

In addition, Executive Order 12866 and federal case law support additional time to comment. EO
not less than

60 days

is reasonable and will ensure WHD will receive meaningful information, such as more accurate and informative comments and better understand how the economy and workers will be impacted by the changes being considered.

PPWO and the undersigned organizations strongly urge WHD to extend the comment period by 60 days. Thank you for your consideration of this request.

Sincerely,

AASA, The School Superintendents Association
AICC, The Independent Packaging Association
Air Conditioning Contractors of America
American Association of Advertising Agencies (4A's)
American Bakers Association
American Bankers Association
American Bus Association
American Car Rental Association
American Council of Engineering Companies
American Council of Independent Laboratories
American Council on Education
American Foundry Society
American Hotel & Lodging Association
American Pipeline Contractors Association
American Road & Transportation Builders Association
American Society of Travel Advisors (ASTA)
American Staffing Association
American Supply Association
AmericanHort
Amusement & Music Operators Association
Associated Builders and Contractors
Associated Equipment Distributors
Association of Educational Service Agencies
Association of School Business Officials International (ASBO)
Construction Industry Round Table
Family Business Coalition
FMI - The Food Industry Association
Foodservice Equipment Distributors Association
Global Cold Chain Alliance
Heating, Air-conditioning, & Refrigeration Distributors International
HR Policy Association
IAAPA, the global association for the attractions industry
IHRSA The Health & Fitness Association
Independent Community Bankers of America
Independent Electrical Contractors
Independent Insurance Agents & Brokers of America (Big "I")

National Wooden Pallet & Container Association
NATSO, Representing America's Travel Plazas and Truckstops
Ohio Society of CPAs
Outdoor Amusement Business Association
Outdoor Power Equipment and Engine Service Association
Pennsylvania Food Merchants Association
Petroleum Equipment Institute (PEI)
Portland Cement Association
Power & Communication Contractors Association
Precision Machined Products Association
Precision Metalforming Association
Public Sector HR Association (PSHRA)
Retail Industry Leaders Association (RILA)
Saturation Mailers Coalition
SIGMA: America's Leading Fuel Marketers
Small Business & Entrepreneurship Council

Textile Care Allied Trades Association
The Associated General Contractors of America
The Transportation Alliance
TRSA - The Linen, Uniform and Facility Services Association
U.S. Chamber of Commerce
Virginia Small Business Partnership
WASDA - Water & Sewer Distributors of America
Window & Door Manufacturers Association
Workplace Solutions Association
