

September 21, 2023

Douglas Parker
Assistant Secretary of Labor for Occupational Safety and Health
Occupational Safety and Health Administration
Department of Labor
Room S-3502
200 Constitution Avenue, N.W.
Washington, DC 20210

RE: Extension Request for Notice of Proposed Rulemaking, "Worker Walkaround Representative Designation Process" (88 FR 59825, RIN: 1218-AD45)

Dear Assistant Secretary Parker:

The Coalition for Workplace Safety (CWS) and the 74 undersigned organizations write to you to request a 60-day extension to the comment period on the agency's above-referenced notice of proposed rulemaking in order to provide the regulated community with sufficient time to analyze and respond to the Occupational Safety and Health Administration's (OSHA) proposed changes to its worker walkaround representative designation process.

CWS is comprised of associations and employers who believe in improving workplace safety through cooperation, assistance, transparency, clarity, and accountability. CWS believes that workplace safety is everyone's concern. Improving safety can only happen when all parties – employers, employees, and OSHA – have a strong working relationship.

OSHA's proposed rulemaking would allow employees to designate nonemployees as their representative during facility walkarounds with OSHA Compliance Safety and Health Officers. This is a significant change to the agency's procedures for workplace safety inspections.

A 60-day extension to the comment period would ensure the regulated community has the opportunity it needs to analyze the changes, assess their potential impacts, and draft comprehensive comments that will fully address the consequences of these changes on the economy, business operations, and workplace dynamics. By providing this extension, OSHA will obtain more insightful and useful input from the regulated community before making such significant changes to its procedures.

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

Sincerely,

Air Conditioning Contractors of America

American Bakers Association

American Car Rental Association

American Coke and Coal Chemicals Institute

American Composites Manufacturers Association

American Foundry Society

American Hotel & Lodging Association

American Pipeline Contractors Association (APCA)

American Rental Association

American Road & Transportation Builders Association

American Subcontractor Association

American Supply Association

Associated Builders and Contractors

Associated Equipment Distributors

Associated General Contractors of America

Associated Wire Rope Fabricators

CAWA - Representing the Auto Parts Industry

Construction Industry Round Table

FMI - The Food Industry Association

Foodservice Equipment Distributors Association

Global Cold Chain Alliance

Heating, Air-conditioning, & Refrigeration Distributors International

HR Policy Association

Independent Electrical Contractors

Industrial Fasteners Institute

International Foodservice Distributors Association

Leading Builders of America

Manufactured Housing Institute

MEMA, The Vehicle Suppliers Association

National Armored Car Association

National Association of Chemical Distributors (NACD)

National Association of Convenience Stores

National Association of Home Builders

National Association of Landscape Professionals

National Association of Manufacturers

National Association of Professional Employer Organizations

National Association of Wholesaler-Distributors

National Automobile Dealers Association

National Club Association

National Cotton Ginners Association

National Council of Agricultural Employers

National Council of Chain Restaurants

National Demolition Association (NDA)

National Federation of Independent Business

National Grocers Association

National Lumber & Building Material Dealers Association

National Public Employer Labor Relations Association

National Ready Mixed Concrete Association

National Restaurant Association

National Retail Federation

National RV Dealers Assoc. (RVDA)

National Tooling and Machining Association

National Utility Contractors Association

NATSO, Representing America's Travel Plazas and Truckstops

Non-Ferrous Founders' Society

Pennsylvania Food Merchants Association

Petroleum Equipment Institute

Plastics Industry Association (PLASTICS)

Plastics Pipe Institute

Power and Communication Contractors Association (PCCA)

Precision Machined Products Association

Precision Metalforming Association

Retail Industry Leaders Association (RILA)

SIGMA: America's Leading Fuel Marketers

Small Business & Entrepreneurship Council

Technology & Manufacturing Association

Texas Cotton Ginners' Association

Tree Care Industry Association

TRSA - The Linen, Uniform and Facility Services Association

Truck Renting and Leasing Association

U.S. Apple Association

U.S. Chamber of Commerce

Window & Door Manufacturers Association

World Millwork Alliance