



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