



May 9, 2024

Jessica Looman  
Administrator  
Wage and Hour Division  
U.S. Department of Labor  
200 Constitution Ave NW  
Washington, DC 20210

Dear Administrator Looman:

The Partnership to Protect Workplace Opportunity (PPWO) and the 87 undersigned organizations write to request the Wage and Hour Division (WHD) extend the implementation date of the first increase to the minimum salary threshold under its new final rule altering the overtime regulations under the Fair Labor Standards Act (FLSA), published in the Federal Register on April 26, 2024 (29 CFR 541).

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 FLSA overtime regulations. PPWO's 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.

WHD's new rulemaking implements two increases to the minimum salary threshold under which all workers must be paid overtime. The first phase increases the minimum salary threshold from the current \$35,568 to \$43,888. This increase is currently set to go into effect on July 1, 2024.

WHD is providing the regulated community with only two months to analyze the rule, determine what changes to their operations and payrolls will be necessary, explain to the impacted workers how and why their pay, titles, or workplace responsibilities will change, and then implement those changes. This is an arbitrary and burdensome timeline for the regulated community to meet, especially smaller businesses that do not have the resources to make such changes quickly. We therefore request the Wage and Hour Division extend the implementation date for this increase to at least September 1, 2024, to allow employers sufficient time to understand the rule, implement the necessary alterations, and inform workers of the changes that will significantly impact them.

PPWO and the undersigned organizations urge you to extend the implementation date as quickly as possible to ensure the employer community can adjust to the new rule appropriately.



Sincerely,

Partnership to Protect Workplace Opportunity  
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 Hotel & Lodging Association  
American Pipeline Contractors Association  
American Road & Transportation Builders Association  
American Society of Travel Advisors (ASTA)  
American Staffing Association (ASA)  
American Supply Association  
American Trucking Associations  
AmericanHort  
Associated Builders and Contractors  
Associated Equipment Distributors  
Associated General Contractors of America  
Association of Educational Service Agencies  
Association of School Business Officials International (ASBO)  
Ceramic Tile Distributors Association  
Construction Industry Round Table  
FMI - The Food Industry Association  
Global Cold Chain Alliance  
Heating, Air-conditioning, & Refrigeration Distributors International  
HR Policy Association  
IAAPA, the Global Association for the Attractions Industry  
Independent Electrical Contractors  
Independent Lubricant Manufacturers Association  
International Bottled Water Association  
International Foodservice Distributors Association  
International Warehouse Logistics Association (IWLA)  
ISSA, The Worldwide Cleaning Industry Association  
Kansas Cotton Association  
Manufactured Housing Institute  
National Apartment Association  
National Association of College and University Business Officers  
National Association of College Auxiliary Services



National Association of College Auxiliary Services (NACAS)  
National Association of College Stores  
National Association of Convenience Stores  
National Association of Home Builders  
National Association of Independent Colleges and Universities  
National Association of Landscape Professionals  
National Association of Professional Insurance Agents  
National Association of Theatre Owners  
National Association of Wholesaler-Distributors  
National Automobile Dealers Association  
National Beer Wholesalers Association  
National Confectioners Association  
National Cotton Council  
National Cotton Ginners Association  
National Council of Chain Restaurants  
National Council of Farmer Cooperatives  
National Demolition Association (NDA)  
National Federation of Independent Business  
National Grocers Association  
National Lumber & Building Material Dealers Association  
National Multifamily Housing Council  
National Public Employer Labor Relations Association  
National Ready Mixed Concrete Association  
National Restaurant Association  
National Retail Federation  
National Rural Education Association  
National Tooling and Machining Association  
National Wooden Pallet & Container Association  
NATSO, Representing America's Travel Centers and Truck Stops  
Ohio Society of CPAs  
Pennsylvania Food Merchants Association  
Petroleum Equipment Institute (PEI)  
Power & Communication Contractors Association  
Precision Machined Products Association  
Precision Metalforming Association  
PRINTING United Alliance  
Restaurant Law Center  
Saturation Mailers Coalition  
Service Station Dealers of America and Allied Trades (SSDA-AT)  
SIGMA: America's Leading Fuel Marketers  
Small Business & Entrepreneurship Council  
Southern Cotton Ginners Association  
Texas Cotton Ginners' Association  
The Transportation Alliance



Tire Industry Association (TIA)  
Transportation Intermediaries Association (TIA)  
U.S. Chamber of Commerce  
Workplace Solutions Association

cc: U.S. Senate Health, Education, Labor, and Pensions Committee  
U.S. Senate Appropriations Committee  
U.S. House of Representatives Committee on Education and the Workforce  
U.S. House of Representatives Appropriations Committee