



March 10, 2013

U.S. Department of Labor  
Division of Regulations, Legislation, and Interpretation, Wage and Hour  
Room S-350  
200 Constitution Avenue NW.  
Washington, DC 20210  
[WHDPRAComments@dol.gov](mailto:WHDPRAComments@dol.gov)

RE: Proposed Information Collection Request (ICR) for the Worker Classification Survey  
Document Citation: 78 FR 2447  
Document Number: 2013-00389

I am writing in regards to the Proposed Information Collection Request for the Worker Classification Survey.

As one of America's 10.3 million independent contractors, I am writing to express my concern with the U.S. Department of Labor's proposed study on the alleged misclassification of independent contractors. I believe the true purpose of the proposed study is to make it even more difficult for independent contractors, like myself, and the companies that engage our services to work together.

For more than four years, I have made the choice to be a small business owner so I can pursue the opportunity to make more money and enjoy greater independence and work-life flexibility. I own and operate a consulting business, and I support myself and my family. Like millions of other small business owners, I pay my fair share of state and federal taxes for myself and my business. The success of my business, and those of millions of other independent contractors, is proof enough that we understand our job classification and the rights, benefits and obligations associated with our status.

Efforts like the proposed DOL survey do little more than thwart the entrepreneurial endeavors of working Americans by perpetuating myths about independent contracting and instilling additional fear of prosecution among the businesses that engage our services. The reality is that, according to the IRS, 97 percent of America's independent contractors accurately report their annual income – a statistic that is virtually the same as the reporting made by employees – and we pay higher levels of taxes than employers and employees.

I made the choice to be an independent contractor because I like the flexibility and freedom it offers me. I understand the risks and rewards of independent contracting, and I accept the responsibilities and obligations of small business ownership. I do not believe a government survey, with its hidden agenda of making it more difficult for independent contractors to survive, is productive. Rather, it threatens to result in devastating consequences to the economy, millions of lost jobs and disruption of vital services.

I appreciate your time and consideration of my concerns, and hope you will carefully consider the severe impact this survey could ultimately have on an already weak American economy. Thank you.

Sincerely,

David Steffen  
Isaro Consulting Group