

Joe Trauger

Vice President

Human Resources Policy

March 1, 2013

Karen Livingston
Director, Division of Strategic Planning and Performance
Wage and Hour Division
U.S. Department of Labor
200 Constitution Avenue, NW, Room S-3510
Washington, DC 02210

**RE: Request for 90 Day Extension for Comment Period on Proposed Rulemaking:
Proposed Information Collection Request (ICR) for the Worker Classification Survey**

Dear Ms. Livingston:

On January 11, 2013 the Wage and Hour Division published in the Federal Register a solicitation for comments regarding a proposal to conduct a survey of workers and employers entitled "Proposed Information Collection Request (ICR) for the Worker Classification Survey" (78 Fed. Reg. 2447). Public comments on proposal are due no later than March 12, 2013. The National Association of Manufacturers respectfully requests the Wage and Hour Division extend the comment period.

The goal of the Department of Labor's survey is to "provide critical information to Department policymakers on whether workers have knowledge of their employment classification and whether they understand the implications of their classification status;" however, the survey methodology has not been published or made readily available for anyone to provide fully informed comment.

We, therefore, urge the Wage and Hour Division to consider the request to first publish the survey and to extend the open comment period by 90 days after the survey is published. The extension will assure stakeholders have had the appropriate time needed to review the survey and methodology and to provide the agency with a thorough analysis of the proposal, which will better assist the Agency on how or whether to proceed with a rule.

Sincerely,



Joe Trauger

cc: Boris Bershteyn, Acting Administrator, Office of Information and Regulatory Affairs