

American Federation of Labor and Congress of Industrial Organizations



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March 6, 2009

Mr. Kevin F. Neyland
Acting Administrator, Office of Information
and Regulatory Affairs
Office of Management and Budget
725 17th Street, N.W.
Washington, D.C. 20503
202-395-7245 -- Fax

Dear Acting Administrator Neyland:

The AFL-CIO, a federation of 55 national and international unions representing more than 10 million working men and women across the United States, respectfully requests a 30-day extension of time within which to submit comments on federal regulatory review in response to the Federal Register notice of February 26, 2009, 74 Fed. Reg. 8819.

In soliciting public comment on these issues, the Federal Register notice acknowledges the "unusually high level of public interest" given the "evident importance and fundamental nature of the relevant issues." We agree that issues pertaining to federal regulatory review, and the principles and procedures that should govern this review, are very important and significant, affecting the lives of millions of working people in this country, as well as the relevant agencies and other stakeholders.

The AFL-CIO and its affiliated unions have a long history and experience dealing with issues of regulatory review under Executive Order 12866 in both its current and earlier forms. This experience will inform our comments on the principles and procedures that should govern regulatory review. Given the importance and complexity of the issues presented, and the numerous and substantial issues identified in the President Memorandum on this topic – such as the relationship between OIRA and the agencies, and the role of cost-benefit analysis in regulatory review – a 2 ½ week period of time is simply insufficient to allow us to review the issues, discuss them with our affiliated unions, and prepare a thorough and constructive response.

We therefore ask that you extend the comment period by 30 days to allow the AFL-CIO, and others, sufficient time to participate in this important process.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Lynn Rhinehart". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Lynn Rhinehart
Associate General Counsel

cc: Mr. Michael Fitzpatrick, OIRA