

March 10, 2013

U.S. Department of Labor
Division of Regulations, Legislation, and Interpretation, Wage and Hour
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COMPLETE
PULPWOOD
CHIPPING
FACILITIES IN
HAYWARD,
ASHLAND,
HIXTON,
WISCONSIN

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.

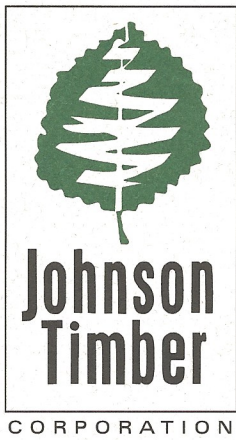
Johnson Timber is a family owned business in Northern Wisconsin that successfully works closely with dozens of independent contractors on a daily basis. Over the past few years, we have watched with increasing concern as federal agencies try to prohibit companies from working with independent contractors, or force reclassification of independent contractors as salaried employees without regard to how that could hurt both contractors and businesses like ours. The U.S. Department of Labor's proposed study of independent contractors is but the latest effort to make it even more difficult for independent contractors and the companies that engage their services to work together.

Many businesses, both large and small, contract with well-managed and successful small businesses to provide the infrastructure necessary to deliver the results consumers have come to expect. At Johnson Timber, we take this approach because it makes sense. We contract with local small businesses to harvest timber and move product from the forest to our factories. We pay our fair share of taxes, and we comply with federal, state and local requirements aimed at ensuring worker safety and fair and ethical practices. Moreover, independent contractors who contract with our company are required to be in compliance with all applicable local, state and federal laws.

The reality is that independent contractors and other types of alternative workers generate a combined \$626 billion in annual personal income. According to the IRS, not only do 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 – they also pay higher levels of taxes than employers and employees.

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The proposed DOL study is a waste of time and resources that would be better spent on efforts to grow our economy.

I appreciate your time and consideration of my concerns relating to the DOL study, and I hope you will take into account the severity of the consequences resulting from such a study. Thank you.

Sincerely,

Bill Johnson
President
Johnson Timber

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