



**Wisconsin Independent Businesses Inc.**

*The voice of independent business in state government*

March 12, 2013

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

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

To Whom It May Concern:

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

Wisconsin Independent Businesses (WIB) represents thousands of small, independent businesses throughout the state, many of whom successfully work with independent contractors and/or contract with larger companies to help their business grow and prosper.

Over the past few years, we have watched with increasing concern as state and federal agencies attempt various tactics to prohibit companies and independent contractors from working together, without regard to the impact this has on our nation's tenuous economic recovery. The U.S. Department of Labor's proposed study of independent contractors is just the latest effort to curtail the use and success of independent contractors.

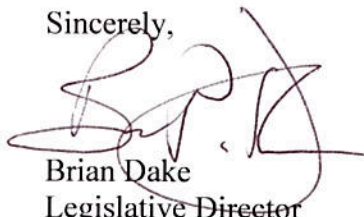
Many businesses, both large and small, contract with well-managed and successful small businesses to provide the infrastructure necessary to remain competitive. Contrary to allegations made by some state and federal policymakers, independent contractors and the companies that use their services pay their fair share of taxes and comply with federal, state and local requirements. In fact, 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.

Independent contractors and small businesses are vitally important to job growth. Economic studies show that for the past 30 years, new small businesses, including independent contractors, have been responsible for nearly *all* of the net growth in U.S. employment. In a tepid economic recovery, government should do everything it can to protect the small-business engine that is essential to economic recovery. The proposed DOL study will do just the opposite by imposing more apprehension and fear of prosecution, even among those enterprises striving to obey all laws.

Wisconsin Independent Businesses and its members do not believe a government survey, with its hidden agenda of making it more difficult for companies and independent contractors to work together, is a valuable use of federal resources or taxpayer funds.

Thank you in advance for your consideration of our concerns.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Dake", with a large, stylized flourish extending from the end of the signature.

Brian Dake  
Legislative Director  
Wisconsin Independent Businesses