



January 11, 2022

The Honorable Douglas Parker  
Assistant Secretary for Occupational Safety and Health  
US Department of Labor  
200 Constitution Ave, NW  
Washington, DC 20210

RE: Extension Request for the Comment Period on RIN: 1218-AD39, Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings

Dear Assistant Secretary Parker:

The Coalition for Workplace Safety (“CWS”) respectfully requests an extension to the comment period on the Occupational Safety and Health Administration’s (“OSHA”) Advanced Notice of Proposed Rulemaking (“ANPRM”), Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings, which was published in the Federal Register on October 27, 2021. CWS and many of its member associations intend to comment on the ANPRM. OSHA’s current comment period, however, poses challenges for stakeholders seeking to provide thoughtful, accurate responses to the numerous questions posed in the ANPRM. Consequently, while CWS appreciates OSHA’s extension to January 26<sup>th</sup>, we ask that you consider extending the comment period by an additional 30 days, through February 2022, to give stakeholders time to provide thoughtful responses to the ANPRM.

CWS is a coalition of trade associations and companies focused on establishing reasonable and responsible workplace safety standards across the country. We base our efforts on five key principles – cooperation among all parties, assistance from OSHA to educate the employer community on workplace safety, transparency from OSHA on the data, science, and studies used to develop its safety regulations, clarity within safety regulations to best ensure compliance, and accountability among all stakeholders for their roles in protecting the workforce.

As it currently stands, OSHA has provided 90 days, much of which fell over the holidays, for the public to provide input on its proposal, which includes over 100 questions that will require resource-intensive research and data collection. To provide OSHA with comprehensive, accurate, and meaningful input, stakeholders need ample time to analyze the ANPRM, collect the relevant information and data, and compile thoughtful comments for the agency to consider. For this reason, CWS strongly urges OSHA to provide an additional 30 days to the comment period.

Thank you for your consideration of this matter.

Sincerely,  
American Bakers Association  
American Coke and Coal Chemicals Institute

American Mold Builders Association  
American Pipeline Contractors Association  
American Trucking Associations  
Associated Builders and Contractors  
Distribution Contractors Association  
Flexible Packaging Association  
IAAPA, The Global Association for the Attractions Industry  
Independent Electrical Contractors  
Industrial Fasteners Institute  
Industrial Minerals Association – North America  
International Dairy Foods Association  
International Warehouse Logistics Association  
Manufactured Housing Institute  
National Association of Home Builders  
National Automobile Dealers Association  
National Club Association  
National Cotton Council  
National Cotton Ginners Association  
National Demolition Association  
National Ready Mixed Concrete Association  
National Retail Federation  
National Stone, Sand & Gravel Association  
National Tooling and Machining Association  
National Utility Contractors Association  
Non-Ferrous Founders' Society  
North American Die Casting Association  
North American Meat Institute  
Plastics Pipe Institute  
Portland Cement Association  
Power and Communication Contractors Association  
Precision Machined Products Association  
Precision Metalforming Association  
Reusable Industrial Packaging Association  
TRSA, The Line, Uniform and Facility Services Association  
U.S. Chamber of Commerce