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July 22, 2025

Ms. Amanda Laihow
Acting Assistant Secretary of Labor
Occupational Safety and Health Administration
200 Constitution Avenue NW
Washington DC 20210

Re: Amending the Medical Evaluation Requirements in the Respiratory
Protection Standard for Certain Types of Respirators, Docket No. OSHA-2025-
0006

Dear Ms. Laihow,

Thank you for the opportunity to submit comments in response to the Occupational Safety and Health Administration's (OSHA) Notice of Proposed Rulemaking (NPRM) concerning Amending the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators.

AGC is the nation's leading construction trade association. It dates to 1918 and today represents more than 28,000 member firms including construction contractor firms both union and open-shop, suppliers, and service providers. Through a nationwide network of 87 chapters in all 50 states, D.C., and Puerto Rico, AGC contractors are engaged in the construction of the nation's highways, bridges, utilities, airports, transit systems, public and private buildings, water works facilities and multi-family housing units, among other things critical to the economy.

We are committed to providing you with a robust comment on this rule. We have already begun the legwork to talk to our members and gather their input. Our goal is



AGC
THE CONSTRUCTION
ASSOCIATION

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to give you industry-specific feedback that will be helpful in publishing a legally sufficient final rule that keeps contractors safe on the work site.

Because of the volume of regulations put out by OSHA whose comment periods close on the same day (September 2), we respectfully request a 30-day extension of the comment period. We believe an extension serves the best interest of both OSHA and the regulated public, thank you.

Very Respectfully,

Kevin Cannon,
Senior Director, Safety, Health and Risk Management
Associated General Contractors of America