



Thomas L. Brown, President  
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Jeffrey D. Shoaf, Chief Executive Officer  
James V. Christianson, Chief Operating Officer

July 22, 2025

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

Re: Construction Illumination, Docket No. OSHA-2025-0040

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 Construction Illumination.

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 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.



**AGC**  
THE CONSTRUCTION  
ASSOCIATION

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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