



August 8, 2025

Ms. Amanda Laihow
Acting Assistant Secretary of Labor
Occupational Safety and Health Administration
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Re: Request for Extension of Public Comment Period for *Interpretation of the General Duty Clause: Limitation for Inherently Risky Professional Activities*, Docket No. OSHA-2025-0041

Dear Ms. Laihow:

On behalf of the National Roofing Contractors Association, I am writing to respectfully request an extension of the public comment period for the Occupational Safety and Health Administration's proposed rule titled *Interpretation of the General Duty Clause: Limitation for Inherently Risky Professional Activities*, published in the Federal Register under Docket No. OSHA-2025-0041.

Founded in 1886, the NRCA is one of the oldest trade associations in the nation, representing roofing professionals worldwide. Our nearly 4,000 member companies, mostly small businesses with around 45 employees each, cover all parts of the industry across all 50 states and internationally. We are concerned about how this rulemaking might affect our stakeholders and are dedicated to providing OSHA with detailed, valuable input.

However, given the scope and complexity of the proposed rule changes, the number of other rulemaking changes proposed under this same timeframe, and the need to solicit feedback from our members and technical experts, we respectfully request that OSHA extend the public comment deadline by 60 days beyond the current deadline of September 2, 2025. An extension would ensure the public has adequate time to analyze the proposed provisions and prepare fully informed comments.

Thank you for considering this request. We appreciate OSHA's efforts to improve workplace safety and your willingness to engage with all stakeholders. Please do not hesitate to contact me at 847-493-7502 or cambrose@nrca.net if you have any questions or need additional information.

Sincerely,

Cheryl Ambrose, CHST, OHST
Vice President, Enterprise Risk Management

NATIONAL ROOFING CONTRACTORS ASSOCIATION