

May 1, 2025

Mr. Russell T. Vought
Director of the United States Office of Management and Budget
The Office of Management and Budget
725 17th St NW
Washington, DC 20503

Ms. Kelsi Feltz
Policy Analyst
The Office of Management and Budget
725 17th St NW
Washington, DC 20503

Dear Mr. Vought and Ms. Feltz:

We write today on behalf of a broad consortium of our clients who own and operate substantial business interests in the United States to request a 45-day extension of the deadline to submit comments to the Office of Management and Budget's (OMB) April 11, 2025 Request for Information (RFI). Our clients represent a significant swath of manufacturing, mining, petrochemical, transportation, telecommunications, healthcare, technology, retail, aerospace, and a myriad of other industries. Our representation of these clients focuses on their commitment to the safety and health of their employees.

We are extremely pleased that OMB is giving serious consideration to the burden that select regulations place on American businesses and industry. While we understand that clear and robust regulation is an important aspect of ensuring the protection and safety of the American workforce, we firmly believe that a regulatory construct can be achieved that is not unduly burdensome for American employers and yet accomplishes the common objective of the government and our clients – to keep American workers safe and healthy while allowing businesses to flourish.

We also believe that regulations remain “on the books” that are outdated and antiquated, and that do not provide the most effective protections that can be afforded our employees because they do not take into account the monumental technological advances that have been achieved over the last quarter century. Both overly burdensome regulations that do not provide attendant employee

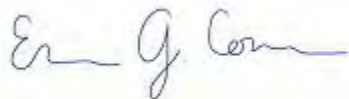
protections, as well as outdated and antiquated regulations should be carefully evaluated for prompt revision and modification.

We request an additional 45 days to provide a response to the RFI to provide time to engage with our client base to identify those regulations in the occupational safety and health area that should be considered for OMB review. While we recognize and support prompt action in this area, it is critical that OMB receive thoughtful and fulsome information and support, explanation, rationale, and justification for the regulations we identify that should be subject to review. With this additional time, we plan to compile sound information that supports our clients' recommendations. This information will: (1) allow OMB to properly weigh and prioritize the information received from the public in response to this RFI; and (2) provide justification for a decision OMB may make to move forward with our recommendations.

We very much appreciate this opportunity and believe an additional 45 days, until May 26, 2025, will allow the regulated community to prepare responses that will support OMB in its efforts.

Thank you very much for your consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads "Eric J. Conn". The signature is fluid and cursive, with the first name "Eric" and last name "Conn" being the most prominent parts.

Eric J. Conn
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