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September 9, 2025

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RE: Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings Proposed Rule, Docket (OSHA-2021-0009)

**REQUEST FOR EXTENSION OF TIME TO SUBMIT
POST-HEARING COMMENTS AND BRIEFING**

On behalf of my client, the Coalition for Workplace Safety (CWS) I am writing to request that the post-hearing comment period be extended by 90 days, resulting in an extension of the current post-hearing comment deadline of September 30, 2025 to December 30, 2025. Good cause exists to grant this request, including the following:

- 1) The Heat Injury and Illness Prevention Proposed Rule has drawn considerable attention, resulting in the receipt of over 47,000 comments as of September 8, 2025. This interest not only led to a multi-day public hearing allowing interested parties to testify regarding the proposed rule, but also led to the issuance of a July 2, 2025, memo to re-open the comment period to allow for the submission of post-hearing comments through September 30, 2025. Through this process, OSHA is inviting individuals who submitted a Notice of Intention to Appear to file additional evidence and data relevant to the proposed rule, including written responses to questions asked during the hearing.
- 2) To aid interested parties in the preparation of post-hearing comments, OSHA released a compilation of questions, including common questions, less than 30 days ago, on August 13, 2025. Other interested parties have continued to file supplemental documents and evidence over the last 30 days.
- 3) A clear theme evident in the recently released written materials is that OSHA is seeking feedback on ways to tailor more flexibility into its approach, including encouragement to stakeholders to submit examples of existing, effective heat programs, with evidence-based recommendations on how the proposed rule may limit those practices.

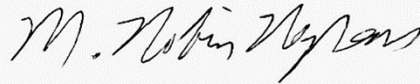
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- 4) In order to allow CWS and its members time to fully and effectively respond to the written feedback released by OSHA on August 13, 2025, and to continue gathering examples of how the proposed rule is likely to limit our clients' existing heat programs, CWS requires additional time to review the transcripts and questions presented during the hearing with its members, which include 81 organizations who joined CWS in its submission of public comments on the proposed rule.

Thank you in advance for your attention to our request. Please don't hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Robin Repass", is displayed on a light gray rectangular background.

Robin Repass
For FISHER & PHILLIPS LLP