



September 14, 2023

Jessica Looman
Principal Deputy Administrator
Wage and Hour Division
Department of Labor
Room S-3502
200 Constitution Avenue, N.W.
Washington, DC 20210

RE: Extension Request for Notice of Proposed Rulemaking, “Defining and Delimiting the Exemptions for Executive, Administrative, Professional, Outside Sales, and Computer Employees” (RIN 1235-AA39)

Dear Principal Deputy Administrator Looman:

The National Demolition Association (NDA) represents nearly 500 U.S. and Canadian companies that offer standard demolition services as well as a full range of demolition-related services and products. NDA educates members on the latest advances in equipment and services, provides educational programs and tools to stay abreast of regulatory and safety matters and keeps regulators informed about issues in our industry. NDA also increases public awareness of the economic and societal benefits of demolition.

NDA writes today to request an extension to the comment period for an additional 60 days for the Wage and Hour Division’s (WHD) proposed changes to the overtime pay exemptions for executive, administrative, professional, outside sales, and computer employees.

The proposed rule would increase the standard minimum salary level from \$35,568 per year to \$55,068 per year and implement automatic increases to the threshold every three years. This is an extensive rulemaking that will have a significant economic impact on both employers and workers. NDA believes an extended comment period is needed for stakeholders to fully analyze the rulemaking and better understand its effect on the regulated community. This extended comment period will allow for NDA and other stakeholders to provide the Department with comprehensive and informative comments on the proposed rule.

Therefore, NDA asks the Department to extend the comment period by 60 days to January 8, 2024. Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Lambert", is written over a light blue horizontal line.

Jeff Lambert
Chief Executive Officer
National Demolition Association (NDA)