



Joe Trauger

Vice President,

Human Resource Policy

November 12, 2010

OSHA Docket Office
Docket Number OSHA-2010-0032
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, NW
Washington, DC 20210

By Electronic Submission: www.regulations.gov

Re: Docket No. OSHA-2010-0032, Request for Extension of Comment Period

For the Docket:

On October 19, 2010, the Occupational Safety and Health Administration (OSHA) published in the Federal Register a proposed interpretation of the term “feasible administrative or engineering controls” as used in the applicable sections of OSHA’s General Industry and Construction Occupational Noise Exposure standards (29 CFR Parts 1910 and 1926).

OSHA has requested public comments on its proposed interpretation, which will have a far-reaching impact on employers. Currently, comments are due by December 20, 2010. Due to the scope of the proposed changes, however, stakeholders will need additional time to fully compile accurate and thorough responses to the Agency’s proposal. We request that OSHA extend the comment deadline an additional 90 days to March 20, 2011.

Such an extension is necessary to accurately assess the impact of the proposed noise exposure requirements. OSHA’s proposed changes would be a very significant alteration to decades-old established policy and would likely result in widespread operating changes for companies of all sizes.

This proposal would be particularly burdensome to employers, and they will need additional time to fully understand what changes would be required as a result of OSHA’s proposed reinterpretation. To provide the agency with substantive and comprehensive analysis of the proposed changes, stakeholders will need to closely examine numerous operating changes that would need to be made to comply in the new requirements.

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We urge OSHA to reconsider the comment period for this proposal and grant an extension of 90 days. This additional time will help assure more thorough analyses and comprehensive comments to better assist the Agency as it considers how or whether to move forward with the proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Trauger". The signature is fluid and cursive, with a large, stylized initial "J" and "T".

Joe Trauger