



AMERICAN BENEFITS
COUNCIL

March 10, 2016

Mr. Robert Waterman
Compliance Specialist
Wage and Hour Division
Room S-3510
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

**RE: RIN 1235 - AA13 Establishing Paid Sick Leave for Federal Contractors -
Request for Extension of Public Comment Period regarding the Notice of
Proposed Rulemaking published in the Federal Register on February 25, 2016**

Dear Mr. Waterman,

The American Benefits Council respectfully requests that the Department of Labor (DOL) extend the comment period for the proposed rule that will require federal contractors and their subcontractors provide employees with up to 7 days of paid leave including paid leave for family care.

The Council is a public policy organization representing principally Fortune 500 companies and other organizations that assist employers of all sizes in providing benefits to employees. Collectively, the Council's members either sponsor directly or provide services to retirement and health plans that cover more than 100 million Americans.

The Council's members have a strong interest in rules affecting federal contractors. Public comment periods for most proposed rules are typically 60 to 90 days. This 81 page proposed rule will have a substantial economic impact on businesses engaged in federal contracting and it should be thoughtfully examined by the regulated community before the comment period is closed. The Council and its members need sufficient time to review and analyze the package to ensure that we can provide the Department with the input it has requested.

It is in this context that we request the comment period be extended. The comment period for the proposed rule is 32 days. Additional time would be beneficial to allow a more comprehensive evaluation of issues that are already being identified by Council members. The Council has begun to receive input on parts of the proposed rule that would benefit from refinement and additional clarification so that federal contractors can work effectively to ensure compliance and avoid confusion. Contractors are also raising concerns regarding possible conflicts with other laws and possible internally inconsistent requirements. Additional time for comments would be beneficial to consider the impact of the Department's proposal on other benefit programs and compensation as well.

Many of our member companies that are federal contractors are still reviewing the proposed rule, consulting with their human resources and compliance offices and evaluating the numerous changes, adjustments, compliance and reporting requirements that will need to be made to assure that they fully comply with the rule. To close the comment period by the end of this month will not allow sufficient time to these companies thoroughly evaluate their operations and the interaction of the proposed rule with other laws and regulations. Companies also need to consider how the proposed changes will affect their interactions with their employees, subcontractors and their other customers.

We appreciate the opportunity to comment. We appreciate also that the Department is soliciting the best input possible from the regulated community, such as the member companies of the American Benefits Council. In order for this to occur, the Department needs to provide sufficient time for that level of review and consideration of the proposed rule.

Thank you for considering our request.

Sincerely,

A handwritten signature in cursive script that reads "Lynn D. Dudley". The signature is written in black ink and is positioned above the typed name.

Lynn D. Dudley
Senior Vice President,
Global Retirement and Compensation Policy