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Rec'd

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8:24 am

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Samuel R. Marshall
President & CEO

June 15, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
14th Floor
333 Market Street
Harrisburg, PA 17101

**Re: Regulation 12-67 - Department of Labor and Industry's
final-form regulation on general provisions**

Dear Chairman Coccodrilli:

On behalf of our member companies and our trade association counterparts at the national level, we recommend the IRRC approve this regulation. We appreciate the efforts made by the Department of Labor and Industry to ensure that this regulation is one capable of practical implementation and worthwhile results.

We offer some minor comments for possible clarification or monitoring by the Department, and both relating to Section 121.3b and providing workers' compensation information:

- Where the information is mailed to an employee, we assume that mailing by regular mail to the last known address satisfies this requirement.
- We recommend the Bureau consider developing a form for this down the road to replace the requirements in subsection (c) specifying size of paper and size of font.

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We also appreciate the efforts of IRRC staff in reviewing this regulation as proposed, and in working with the Department and the many affected parties to resolve differences and produce a final-form regulation that is truly an improvement for more efficient and fair regulation by the Department.

Sincerely,

Samuel R. Marshall

C: Elizabeth Crum, Department of Labor and Industry
John Kupchinsky, Bureau of Workers Compensation
Thomas Kuzma, Bureau of Workers Compensation

Honorable John R. Gordner
Honorable Christine M. Tartaglione
Honorable Robert E. Belfanti, Jr.
Honorable Gene DiGirolamo