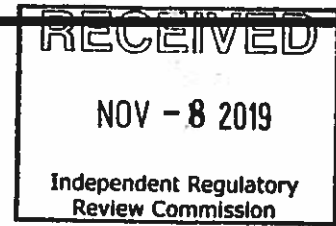


3202

Form Letter C 12-14

Kathy Cooper

From: Greg Rautzhan <greg@gregrautzhan.com>
Sent: Friday, November 8, 2019 12:18 PM
To: IRRC
Subject: Proposed Massive Overtime Rule Expansion



CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear PA Independent Commission,

I feel this overtime ruling would harm employee morale and workplace culture if employees are required to clock in and out and lose the flexibility and stability that comes with earning a salary. It will also affect employees with family's: sick children, attending school events or emergency's. .

Thank you for the opportunity to comment on the Final Form Regulation submitted by the Pennsylvania Department of Labor and Industry (L&I). These regulations are intended to update the rules that determine if an employee is required to be paid overtime.

Though this proposed regulation may be well-intended I am deeply concerned with the negative impacts on employers and many of the very employees whom the proposal is supposed to help.

L&I's first version of this regulation submitted in June 2018 proposed more than doubling the wage threshold to potentially qualify for exempt status. Despite hundreds of comments reflecting widespread concern among employers from a range of industry sectors, L&I made only minimal changes. The new proposal would still increase the salary threshold by over 92 percent and require regular increases using a formula that would impose larger and larger increases.

The same concerns described in 2018 remain. Employers may not have the ability to simply absorb higher labor costs and many nonprofits rely on static government funding. A significant salary threshold increase of this nature will force many of these employers to convert salaried employees to hourly status in order to track and cap hours. This transition typically entails a more rigid work schedule with less flexibility, burdensome record-keeping, fewer training opportunities and benefits. Hourly workers required to clock in and clock also risk less take-home pay if hours worked in a week dip below 40.

I am also concerned that, despite some improvements, the proposal still falls short of L&I's stated goal of aligning federal and state overtime laws. Overtime laws are among the most difficult for employers to administer and even if L&I's proposal is approved this area of employment law will still be unnecessary complicated and inconsistent.

We urge the Independent Regulatory Review Commission to disapprove of this regulation. A similar proposal was struck down by a federal court, IRRC itself expressed concerns back in 2018 that L&I does not appear to have addressed and the U.S. Department of Labor is already planning to increase the salary threshold, albeit at a more reasonable level, in 2020.

Thank you for considering my views on this important matter.

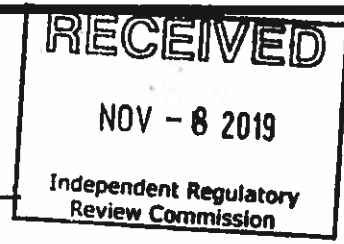
Sincerely,

Greg Rautzhan
432 Main St
Shoemakersville, PA 19555
greg@gregrautzhan.com

3202

Kathy Cooper

From: Ginger Kunkel <gkunkel@riverviewbankpa.com>
Sent: Friday, November 8, 2019 9:12 AM
To: IRRC
Subject: Proposed Massive Overtime Rule Expansion



CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear PA Independent Commission,

As a community bank we are already in a cost cutting mode due to economic pressures and margin compression. This legislation would cause those in our industry to eliminate more jobs, especially in the area of mortgage origination which has traditionally been a salary plus commission exempt position. The last time this legislation was contemplated, it caused us to demote all our assistant managers to an hourly status and to eliminate several positions because it's simply not possible to meet the DOL's proposed minimum salary in our economically depressed rural Pennsylvania markets and still be profitable . The proposed legislation, if passed, would absolutely result in job loss in our industry.

Thank you for the opportunity to comment on the Labor and Industry (L&I). These regulations are intended to be paid overtime.

Though this proposed regulation may be well-intentioned and many of the very employees whom the propo

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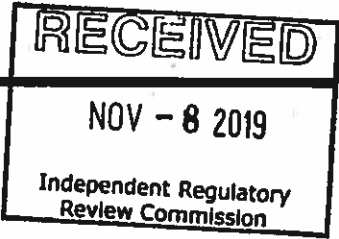
Thank you for considering my views on this important matter.

Sincerely,

Ginger Kunkel
389 Coal Mountain Rd
Orwigsburg, PA 17961
gkunkel@riverviewbankpa.com

3702

Kathy Cooper



From: Matthew Berrena <mattb@jtbmechanicals.com>
Sent: Friday, November 8, 2019 10:11 AM
To: IRRC
Subject: Proposed Massive Overtime Rule Expansion

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear PA Independent Commission,

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Though this proposed regulation may be well-intended I am deeply concerned with the negative impacts on employers and many of the very employees whom the proposal is supposed to help.

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The same concerns described in 2018 remain. Employers may not have the ability to simply absorb higher labor costs and many nonprofits rely on static government funding. A significant salary threshold increase of this nature will force many of these employers to convert salaried employees to hourly status in order to track and cap hours. This transition typically entails a more rigid work schedule with less flexibility, burdensome record-keeping, fewer training opportunities and benefits. Hourly workers required to clock in and clock also risk less take-home pay if hours worked in a week dip below 40.

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We urge the Independent Regulatory Review Commission to disapprove of this regulation. A similar proposal was struck down by a federal court, IRRC itself expressed concerns back in 2018 that L&I does not appear to have addressed and the U.S. Department of Labor is already planning to increase the salary threshold, albeit at a more reasonable level, in 2020.

Thank you for considering my views on this important matter.

Sincerely,

Matthew Berrena
279 Standing Stone Ave
Huntingdon, PA 16652
mattb@jtbmechanicals.com