3202 Form Ltr C 11-18

Kathy Cooper

From:

Richard Beech < Richard.Beech.1428036@muster.com>

Sent:

Monday, July 02, 2018 5:13 PM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules



Dear Independent Regulatory Review Commission,

Thank you for the opportunity to comment on proposed regulations 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 proposes to more than double the wage requirement to qualify for exempt status. This dramatic increase will force many employers to convert salaried employees to hourly status, which usually entails a far 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.

L&I also proposes changes to the so-called "duties test" which is used in conjunction with the salary threshold to determine exempt status. In the proposed regulation, L&I expressed a desire to align Pennsylvania's "duties test" with federal regulations. This would be a welcome change; unfortunately, the proposed rule falls short of the expressed goal.

The U.S. Department of Labor proposed a very similar regulation in 2015 and employers applauded the ruling to strike down the proposal by U.S. District Judge Amos Mazzant, who was nominated by President Obama to serve the Eastern District of Texas.

The current U.S. Department of Labor is expected to propose a new rule and Pennsylvania should hold off pursuing its own overtime update at least until the new federal rule is proposed.

Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

Richard Beech 629 W. Main St. Grove City, PA 16127 7244589410

From:

Marlin Martin < Marlin, Martin, 1428033@muster.com>

Sent:

Monday, July 02, 2018 3:50 PM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory Review Commission

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Sincerely,

Sincerely,

Marlin Martin 606 E. Evergreen Rd. Lebanon, PA 17042 7172725640 Smolock, Bryan

From:

Linda Perin < Linda. Perin. 1428017@muster.com>

Sent:

Monday, July 02, 2018 12:20 PM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

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JUL - 3 2018

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Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

Linda Perin 1033 Blue Valley Drive, Pen Argyl, Pa. Pen Argyl, PA 18072 6108637070 Form Ltre C

Kathy Cooper

From:

Cliff Ellis <Cliff.Ellis.1429548@muster.com>

Sent:

Tuesday, July 03, 2018 12:23 PM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory Review Commission

Dear Independent Regulatory Review Commission,

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Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

Cliff Ellis 1807 Serene Way Lancaster, PA 17602 7176296512

From:

Andrew Gehman < Andrew.Gehman.1428427@muster.com>

Sent:

Tuesday, July 03, 2018 10:51 AM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory Review Commission

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Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

Andrew Gehman 178 Muddy Creek Church Rd Denver, PA 17517 7173367528

From:

Mary Gaiski < Mary.Gaiski.1428426@muster.com>

Sent:

Tuesday, July 03, 2018 10:30 AM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory
Review Commission

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Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

Mary Gaiski 315 Limekiln Road New Cumberland, PA 17070 7177743440

From:

PATRICK CASTELLANI < PATRICK.CASTELLANI.1428423@

Sent:

Tuesday, July 03, 2018 10:05 AM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory
Review Commission

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Thank you for considering my views on this important matter.

Sincerely,

Sincerely,

PATRICK CASTELLANI 2300 Adams Ave Scranton, PA 18509 5703486283

From:

Karen Willar < Karen. Willar. 1428422@muster.com>

Sent:

Tuesday, July 03, 2018 9:40 AM

To:

IRRC

Subject:

Regulation #12-106 Overtime eligibility rules

RECEIVED

JUL - 3 2018

Independent Regulatory Review Commission

Dear Independent Regulatory Review Commission,

Please consider overtime eligibility rules. Our salary employees are paid well for work. Sometimes, when in a crunch to complete a job, our employees will want to work to get it done. However, we do try to balance the 40 hours work week with early days off. We are also very generous with time off for sickness, family issues and vacations. I am happy with the current overtime rules and do not support a change for my business. Thanks, Karen Willar, RidgeCrest Home Sales, owner. Howard, PA

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Sincerely,

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Karen Willar 11049 N. Eagle Valley Road Howard, PA 16841