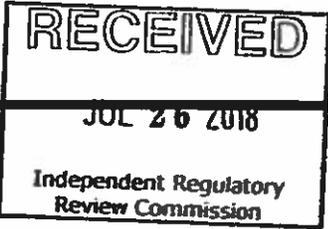


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Kathy Cooper

From: Nicole Kiefer <nicole@corestaffinc.com>
Sent: Thursday, July 26, 2018 4:01 PM
To: IRRC
Subject: Comment on proposed overtime salary threshold increase

Dear Director of Labor Law Smolock,

As a small business owner in Pennsylvania, I am writing in opposition to the Department of Labor and Industry's proposal to more than double the salary threshold for employee overtime eligibility. As you may be aware, a federal court recently struck down an Obama-era rule that proposed to do the same thing to businesses like mine.

The proposed increase in the state threshold from an annual salary of \$23,660 to \$47,892 over three years will harm small businesses and their employees. It will limit the flexibility they can offer them now with hours, benefits, and pay. It will affect the morale of employees at my business by forcing them back to punching a time clock, which will also impact my business' quality, customer service, and reputation. Further, the proposal seriously underestimates the costs to comply because it doesn't take into account the higher costs to small businesses of state mandates like this. Higher costs will force businesses like mine to cut back the hours and pay of the very employees the change is intended to help.

Small businesses like mine can't afford the loss of flexibility. We are a woman-owned and operated small business. My internal staff, comprised mainly of women, enjoy the flexibility they are provided to maintain balance between their home and work lives. They have flexibility to attend to both preventative and therapeutic health care for themselves and their families, which is almost exclusively done during work hours, and can successfully participate in their children's school functions, within reason - all because they are salaried employees with flexibility. They understand and appreciate the acknowledgement from their employer that they are more than a labor commodity. Instead, they are encouraged to maintain healthy families, minds and bodies. They, in turn, are loyal and return their appreciation by accepting personal accountability for their work performance and take seriously their important role in our company. Their appreciation shines through in attitude, competency and enthusiasm.

The increased cost of the proposed overtime rule will certainly negatively impact my company, my staff and the quality of service we produce. It will ultimately reduce benefits and career opportunities for my employees, the very workers it is intended to help.

Sincerely,

Nicole Kiefer
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