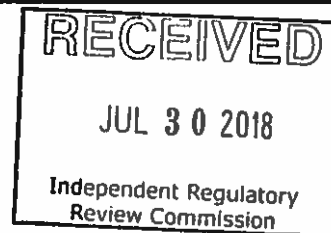


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Kathy Cooper

From: E. Lee Felder, Jr. <E.Lee.FelderJr..1433122@muster.com>
Sent: Monday, July 30, 2018 10:41 AM
To: IRRC
Subject: Regulation #12-106 Overtime eligibility rules



Dear Independent Regulatory Review Commission,

Thank you for considering my comments on behalf of Marywood University employees. The proposed regulations submitted by the Pennsylvania Department of Labor and Industry (L&I) would have an inherently negative impact on this university's finances and a deleterious impact on our employees. While these regulations are intended to update the rules that determine if an employee is required to be paid overtime, they go at cross-purposes with employee morale based on job classification status..

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

Thanks once more for considering my views on this matter.

Sincerely,

E. Lee Felder, Jr.
2300 Adams Ave., Human Resources, Suite 86
Scranton, PA 18509
5703486220