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Independent Regulatory
Review Commission

From: Charles H. Frederickson <CFrederickson@westmorelandfcu.org>
Sent: Monday, August 20, 2018 4:06 PM
To: IRRC
Subject: overtime proposal

There are several concerns about the proposed rule change; one of the most troubling ones is that it's lumps all businesses and all economic locations in the same stroke. You cannot and should not classify a business in Fayette County the same as The Philadelphia suburbs near New Jersey. The economic impact to a small independent business in such an area as Fayette could further devastate their economy with business layoff or worst yet closing because they cannot meet these salary requirements. What this is doing is forcing consolidation of businesses to be able to absorb the impact of such a rule change. Insurance and the government are cutting payments for medical services and with this rule increasing the operational expense of those medical services provider. Small business cannot sustain this. The majority of credit unions in the state of PA are small business and some are classified as Low Income Designation and servicing the under banked. This new rule would not allow for those small credit unions to continue to service this membership.

There needs to be exemptions for small businesses say under 100 employees to allow these business to continue to be the back bone of the state

Charlie Frederickson

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