

MEP IC Extension Request

October 21, 2022

Amy DeBisschop
Director
Division of Regulations, Legislation, and Interpretation
Wage and Hour Division
U.S. Department of Labor
Room S-3502
200 Constitution Avenue, NW
Washington, DC 20210

RE: Notice of Proposed Rulemaking, Employee or Independent Contractor Classification Under the Fair Labor Standards Act, 87 FR 62218 (RIN 1235-AA43)

Dear Director DeBisschop:

The Modern Economy Project writes to request that the Department of Labor's Wage and Hour Division (WHD) extend by 90 days the comment period for the proposed rulemaking entitled "Employee or Independent Contractor Classification Under the Fair Labor Standards Act."

The Modern Economy Project is a broad coalition of leading stakeholders focused on bipartisan policy solutions that promote economic opportunity for all through modern jobs, modern employers, and a modern government. We are dedicated to resetting the conversation in Washington, D.C., on economic policy, and we are not one of the usual players in labor and employment policy debates. Our organization and members have a new perspective to share with the agency, especially considering the significant impact the proposed rulemaking will have on the economy and small businesses in particular. Our goal is to convene thought leaders, employers, and other stakeholders on policy conversations that more accurately reflect the realities of our modern economy.

Given that many of our members are new to this issue and represent smaller entities, they need the additional time we request to convene with their members, discuss the issue, and develop comments. More time is particularly warranted given the complexity of the proposal and the possible far reaching impact.

In addition, the Modern Economy Project has nearly completed research on the impact large companies can have on localities when they enter the market, and we believe this research will be beneficial to the agency as it considers its proposal. While much research currently exists on certain aspects of this topic, ours will focus on areas that are less discussed and understood. We strongly believe this research should be included in the record and considered by the agency in its deliberations. We can only include insights from this important research, however, if the Department extends the comment period.

Thank you for your consideration of this request. The Modern Economy Project looks forward to working with the Department of Labor on this and future issues.

Sincerely,

Modern Economy Project

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