



May 9, 2024

Jessica Looman
Administrator
Wage and Hour Division
U.S. Department of Labor
200 Constitution Ave NW
Washington, DC 20210

Dear Administrator Looman:

The Partnership to Protect Workplace Opportunity (PPWO) and the 87 undersigned organizations write to request the Wage and Hour Division (WHD) extend the implementation date of the first increase to the minimum salary threshold under its new final rule altering the overtime regulations under the Fair Labor Standards Act (FLSA), published in the Federal Register on April 26, 2024 (29 CFR 541).

PPWO is a coalition of a diverse group of associations, businesses, and other stakeholders representing employers with millions of employees across the country in almost every industry. Formed in 2014, the Partnership is dedicated to advocating for the interests of its members in the regulatory debate on changes to the FLSA overtime regulations. PPWO's members believe that employees and employers alike are best served with a system that promotes maximum flexibility in structuring employee hours, career advancement opportunities for employees, and clarity for employers when classifying employees.

WHD's new rulemaking implements two increases to the minimum salary threshold under which all workers must be paid overtime. The first phase increases the minimum salary threshold from the current \$35,568 to \$43,888. This increase is currently set to go into effect on July 1, 2024.

WHD is providing the regulated community with only two months to analyze the rule, determine what changes to their operations and payrolls will be necessary, explain to the impacted workers how and why their pay, titles, or workplace responsibilities will change, and then implement those changes. This is an arbitrary and burdensome timeline for the regulated community to meet, especially smaller businesses that do not have the resources to make such changes quickly. We therefore request the Wage and Hour Division extend the implementation date for this increase to at least September 1, 2024, to allow employers sufficient time to understand the rule, implement the necessary alterations, and inform workers of the changes that will significantly impact them.

PPWO and the undersigned organizations urge you to extend the implementation date as quickly as possible to ensure the employer community can adjust to the new rule appropriately.



Sincerely,

Partnership to Protect Workplace Opportunity
AASA, The School Superintendents Association
AICC, The Independent Packaging Association
Air Conditioning Contractors of America
American Association of Advertising Agencies (4A's)
American Bakers Association
American Bankers Association
American Bus Association
American Car Rental Association
American Hotel & Lodging Association
American Pipeline Contractors Association
American Road & Transportation Builders Association
American Society of Travel Advisors (ASTA)
American Staffing Association (ASA)
American Supply Association
American Trucking Associations
AmericanHort
Associated Builders and Contractors
Associated Equipment Distributors
Associated General Contractors of America
Association of Educational Service Agencies
Association of School Business Officials International (ASBO)
Ceramic Tile Distributors Association
Construction Industry Round Table
FMI - The Food Industry Association
Global Cold Chain Alliance
Heating, Air-conditioning, & Refrigeration Distributors International
HR Policy Association
IAAPA, the Global Association for the Attractions Industry
Independent Electrical Contractors
Independent Lubricant Manufacturers Association
International Bottled Water Association
International Foodservice Distributors Association
International Warehouse Logistics Association (IWLA)
ISSA, The Worldwide Cleaning Industry Association
Kansas Cotton Association
Manufactured Housing Institute
National Apartment Association
National Association of College and University Business Officers
National Association of College Auxiliary Services



National Association of College Auxiliary Services (NACAS)
National Association of College Stores
National Association of Convenience Stores
National Association of Home Builders
National Association of Independent Colleges and Universities
National Association of Landscape Professionals
National Association of Professional Insurance Agents
National Association of Theatre Owners
National Association of Wholesaler-Distributors
National Automobile Dealers Association
National Beer Wholesalers Association
National Confectioners Association
National Cotton Council
National Cotton Ginners Association
National Council of Chain Restaurants
National Council of Farmer Cooperatives
National Demolition Association (NDA)
National Federation of Independent Business
National Grocers Association
National Lumber & Building Material Dealers Association
National Multifamily Housing Council
National Public Employer Labor Relations Association
National Ready Mixed Concrete Association
National Restaurant Association
National Retail Federation
National Rural Education Association
National Tooling and Machining Association
National Wooden Pallet & Container Association
NATSO, Representing America's Travel Centers and Truck Stops
Ohio Society of CPAs
Pennsylvania Food Merchants Association
Petroleum Equipment Institute (PEI)
Power & Communication Contractors Association
Precision Machined Products Association
Precision Metalforming Association
PRINTING United Alliance
Restaurant Law Center
Saturation Mailers Coalition
Service Station Dealers of America and Allied Trades (SSDA-AT)
SIGMA: America's Leading Fuel Marketers
Small Business & Entrepreneurship Council
Southern Cotton Ginners Association
Texas Cotton Ginners' Association
The Transportation Alliance



Tire Industry Association (TIA)
Transportation Intermediaries Association (TIA)
U.S. Chamber of Commerce
Workplace Solutions Association

cc: U.S. Senate Health, Education, Labor, and Pensions Committee
U.S. Senate Appropriations Committee
U.S. House of Representatives Committee on Education and the Workforce
U.S. House of Representatives Appropriations Committee