

Thompson, John

From: Thompson, John
Sent: Tuesday, March 12, 2013 10:01 AM
To: 'WHDPRAComments@dol.gov'
Subject: Comment: Proposed Worker Classification Survey

TRANSMITTED VIA E-MAIL PURSUANT TO 78 Fed.Reg. 2447 (01/11/13)

March 12, 2013

Division of Regulations, Legislation,
And Interpretation
Wage and Hour Division
U.S. Department of Labor
Room S-3502
200 Constitution Avenue, N.W.
Washington, D.C. 20210

Re: Agency Name: Wage And Hour Division
Title of Collection: Worker Classification Survey
OMB Control Number: *None Provided By Agency*
Notice Published At 78 Fed.Reg. 2447 (FR Doc. 2013-00389)

Dear Sir or Madam:

We submit the following comment in connection with this proposed collection of information:

Pursuant to an invitation appearing in the Department of Labor's *Federal Register* Notice cited above, we requested a copy of this proposed information collection by letter dated January 14, 2013. As of this writing, we have received no copy of the proposed information collection, nor have we received any other response. Moreover, we are advised that at least some other interested members of the public also requested a copy but received neither a copy nor any other response.

These circumstances strongly suggest that the Labor Department has failed to provide an adequate opportunity for public comment on this proposed information collection. The Labor Department has clearly failed to do so with respect to members of the public who have expressed their interest in commenting by requesting copies but to whom it has provided none. This state of affairs does not comport with the requirements and purposes of the Paperwork Reduction Act of 1995.

We respectfully submit that the proposed information collection should not be cleared, approved, or undertaken.

Sincerely,

JOHN E. THOMPSON
For FISHER & PHILLIPS LLP