



August 27, 2008

OSHA Docket Office
Docket ID-OSHA-2008-0031
Technical Data Center, Room N-2625
OSHA/U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Docket No. OSHA-2008-0031, Clarification of Remedy for Violation of Requirements to Provide Personal Protective Equipment and Train Employees

Attn: Docket Clerk:

The American Subcontractors Association, Inc. (ASA) represents more than 5,000 construction subcontractors that could potentially be impacted by the above-referenced notice of proposed rulemaking (NPRM) published in the *Federal Register* on August 19, 2008 at 73 Fed. Reg. 48335. Please let this letter serve as a formal request for a ninety (90) day extension of time for submitting written comments.

ASA believes the proposed requirements will have a substantial impact on construction employers, in particular smaller businesses. ASA needs additional time to distribute the NPRM to its members and to analyze and compile the resulting feedback. In addition, ASA notes that the 30-day comment period occurs during a time when many construction firms are particularly busy and also overlaps with the Labor Day holiday.

With the additional time, ASA can assure that its comments will be comprehensive and constructive.

Thank you for your consideration.

Sincerely yours,

E. Colette Nelson
Executive Vice President

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