

# CONSTRUCTION

occurring due to hazardous heat; how hazardous heat exposure and risk varies across industries, occupations, and job tasks; how business size may influence the practices and interventions implemented to prevent heat-related injuries and illnesses and the challenges experienced by businesses of varying sizes, including small businesses, when implementing these prevention strategies; and existing efforts at the state level to prevent occupational heat-related illness, injuries, and fatalities. The CISC intends to review the questions, collect as much information as possible, along with other information from contractors in the field regarding their existing heat injury and illness prevention efforts and submit it for the Agency's consideration. Given the volume and wide range of data and information OSHA is looking for, providing only 60 days to submit this critical information to the Agency is insufficient.

This is an important opportunity for OSHA to gather as much information as possible to make an informed judgment about how to protect construction workers from potentially hazardous heat. Allowing an additional 60 days for comment will result in the Agency receiving a more robust set of data, which would help shape a future regulatory approach. Furthermore, such an extension should not significantly delay the Agency's schedule because this is an ANPRM. We understand that the Agency has been actively gathering data and information, as well, and can continue to do so while the public has additional time to finalize the data gathering process, and the drafting of comments. This short extension will only result in better information submitted to the Agency without negatively impacting OSHA's regulatory agenda.

The CISC appreciates your consideration of this request. This is a very important initiative to the construction industry. The CISC firmly believes that this extension will result in a more robust record for OSHA's consideration.

Sincerely,

*The Construction Industry Safety Coalition*

American Road and Transportation Builders Association  
American Society of Concrete Contractors  
American Subcontractors Association  
Associated Builders and Contractors  
Associated General Contractors  
Association of Equipment Manufacturers  
Association of the Wall and Ceiling Industry  
Concrete Sawing & Drilling Association  
Construction & Demolition Recycling Association  
Distribution Contractors Association  
Independent Electrical Contractors Association  
Interlocking Concrete Pavement Institute  
International Council of Employers of Bricklayers and Allied Craftworkers  
Leading Builders of America  
Mason Contractors Association of America  
Mechanical Contractors Association of America  
National Asphalt Pavement Association  
National Association of Home Builders  
National Association of the Remodeling Industry

# CONSTRUCTION INDUSTRY SAFETY COALITION

National Demolition Association