Congress of the United States
Washington, DC 20515

June 16, 2000

The Honorable Jack Lew, Director
Office of Management and Budget
Old Executive Office Building
Washington, DC 20503

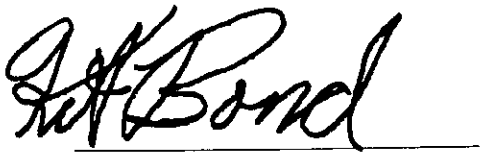
Dear Mr. Lew:

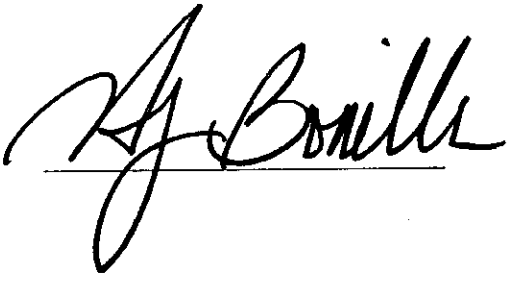
We understand that as part of the regulatory process, the Office of Management and Budget (OMB) will review the cost estimate provided by the Occupational Safety and Health Administration (OSHA) with regard to its proposed ergonomics regulation. We are writing to express our concern over the current cost estimate of this proposed standard.

When OSHA released its initial estimate in February 1999, it projected a total cost of about $1.75 billion for all businesses affected. OSHA then increased its estimate to $4.2 billion when the proposed rule was released in November 1999. This would be the most expensive regulation ever proposed by OSHA. In fact, the Small Business Administration's Office of Advocacy's review of OSHA's estimate found the projections between two and fifteen times below the actual cost. Studies commissioned by non-government authorities estimate the cost to be dramatically higher. The Food Distributors International estimates the cost to its members alone to be as much as $22 billion, and the American Trucking Association estimates the annual cost to its industry to be $6.5 billion. Cost of compliance to members of the American Health Care Association will reach $5.6 to $6.5 billion. The Beer Institute estimates the cost to the beer wholesaling industry to be over $880 million. Additionally, the Employment Policy Foundation estimates the cost to the economy as a whole to be nearly $80 billion.

Before OMB approves this rule, we respectfully request that the Office of Information and Regulatory Affairs (OIRA) closely examine OSHA's cost estimate for this regulation. Thank you for your attention to this matter.

Sincerely,





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