



June 13, 2011

Ms. Debra A. Carr
Director
Division of Policy, Planning and Program Development
Office of Federal Contract Compliance Programs
Room C-3325
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Request for extension of comment period on proposed rule pertaining to Affirmative Action and Nondiscrimination Obligations of Contractors and Subcontractors Regarding Protected Veterans (RIN 1250-AA00)

Dear Ms. Carr:

The Associated General Contractors of America (AGC) requests an extension of the public comment period, for an additional 60 days, on the Office of Federal Contract Compliance Program's (OFCCP) proposed rule pertaining to the affirmative action and nondiscrimination obligations of contractors and subcontractors regarding protected veterans as published in the *Federal Register* on April 26, 2011.

AGC is among the oldest and largest of the nationwide trade associations in the construction industry representing more than 32,000 firms in nearly 100 chapters throughout the United States. Among the association's members are approximately 7,000 of the nation's leading general contractors, more than 12,000 specialty 6(r)300 spualtter1(, m)-2(or)-2(t)13e-10(r)3(ox)-10(i)-r10(a)-02

measuring the effectiveness of its affirmative action efforts regarding protected veterans. The changes are significant and complex, and as a result, this proposed rule will impact all stages of federal contracting for construction employers and will have a substantial impact on the construction industry as a whole.

These regulatory initiatives come at a time when the construction industry is particularly hard hit from the economic recession, suffering from sustained unemployment levels between 16 and 20 percent with no expectation to change any time soon as work on stimulus projects taper off. Construction companies have been forced to cut overhead in order to survive, making it extremely time consuming for skeletal-staffed construction HR departments to review and evaluate these complicated arguments and analyses.

Of particular importance to the construction industry is the proposal that contractors will be required to establish and calculate their own numerical hiring benchmarks; collect is tal-5(n)-10(g)10t(a)(4)-2(-)3