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June 19, 2020

Jay Withrow, Director

Division of Legal Support, ORA, OPPPI, and OWP

Virginia Department of Labor and Industry

600 E. Main St. Suite 207

Richmond, VA 23219

Dear Mr. Withrow:

I appreciate the opportunity to comment on 16VAC 25-220, the emergency temporary standard and emergency regulation for COVID-19 prevention in the workplace. Members of the Virginia Automotive Association are retail stores that perform tire sales and automotive repairs. The natural layout of our locations lends our work spaces to be more than six feet of social distancing. Our service bays are spaced farther apart than six feet, and because of this, our employees performing their required duties are not in contact with other employees or customers. These businesses are offering numerous options so their customers have minimal to no contact with the employees of the store. Concierge pick up and delivery services of the vehicle, after hour exterior key drop services, complimentary Uber rides home or to work, phone payments and more insure a safe experience for our member's customers with little or no contact. In addition, our member store employees wear face coverings and gloves, and exterior surfaces are continuously cleaned and sanitized. The customer's vehicle is sanitized before being returned.

In looking at the criteria for determining those in the "medium risk" our member's locations are vastly different from any type of business listed in this category, including any other retail store. You were quoted in the Virginia Mercury as saying "Those regulations do provide employers with some flexibility, so it is not always one size fits all".

I would respectfully request you consider this flexibility for our industry, and exempt retail tire stores, auto repair stores and service stations from complying with such emergency standards and regulations.

Sincerely,

A handwritten signature in blue ink that reads "Steve Akridge".

Steve Akridge

Executive Director

Virginia Automotive Association