



September 25, 2020

C. Ray Davenport  
Commissioner  
Virginia Department of Labor and Industry  
Main Street Center  
600 East Main Street, Suite 207  
Richmond, Virginia 23219

Re: 16VAC25-220, Proposed Permanent Standard, Infectious Disease Prevention: SARS-CoV-2  
Virus That Causes COVID-19, July 24, 2020.

Dear Commissioner Davenport:

The Virginia Automobile Dealers Association (VADA) represents more than 450 franchised new car and truck dealers in the Commonwealth which employ over 60,000 Virginians. Throughout this pandemic, our members have steered their businesses through challenging times. Virginia's new car dealers, through their service departments, have ensured Virginians have had safe and well-functioning vehicles to access food, healthcare, and other necessities of life. Dealers have also continued to sell vehicles to Virginians who need them in this vital time. Indeed, the pandemic has provided a reminder that, even in times of crisis, franchised auto dealers serve their communities as drivers of the economy, providers of necessary transportation, and sources of familiarity.

Like all Virginia employers, our dealers members have operated during this pandemic with great consideration for Emergency Temporary Standard (ETS) for Infectious Disease Prevention: SARS-CoV-2 Virus That Causes COVID-19, in addition to all other state and federal directives and recommendations. Dealers have adjusted business practices to provide healthy and safe environments for customers and employees, while complying with the myriad regulations and obligations put on them since March.

As the Safety and Health Codes Board considers a permanent standard, we ask that the draft regulation be amended to clarify that the regulation will only remain in effect during the current health emergency. As written, the draft permanent standard would apply to businesses indefinitely.

Along with the rest of the Commonwealth and the country, we follow the reports of treatments and vaccines and are optimistic that COVID-19 will no longer be a public health threat that requires comprehensive and extensive measures to combat it, including the regulations in the proposed permanent standard. At the point that the public health threat is ameliorated, the permanent standard should no longer remain in effect.

We appreciate your time and attention to this important matter. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Donald L. Hall". The signature is written in a cursive, slightly slanted style.

Donald L Hall  
President and CEO