

September 22, 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

Steve Akridge, Executive Director

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Dear Mr. Withrow:

Regarding the DOLI Board consideration of adopting permanent standards for COVID-19, our organization opposes such, and encourages you to not make the ETS permanent. Our members are all small business owners, and their employees and customers are the life blood of their businesses. Thus, they are committed to keeping their work environment safe for both employees and customers. As I had mentioned to you in previous communications, the very nature of our building layout in this industry, naturally gives social distancing for employees. In addition, most offer numerous methods to achieve contactless service, so customers can get necessary repairs to keep their vehicles safe while minimizing their interaction with the shop.

No one is expecting this pandemic to last forever, and thus business owners should not be forced to comply with these regulations on a permanent basis. Many of the provisions of ETS are not consistent with federal guidelines, and are a challenge for our members' small businesses. Our owners are doing every thing they can to survive, keep their employees employed, and maintain a safe work environment.

We respectfully request you not make the ETS regulations permanent, and ask you sunset these when the Governor's state of emergency ends. Thank you for your consideration.

Sincerely,

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