March 3, 2022

Jessica K. Looman
Acting Administrator
Wage and Hour Division
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Warehousing and Logistics Worker Initiative

Dear Administrator Looman:

On behalf of the International Warehouse Logistics Association, the National Association of Wholesaler-Distributors, and the undersigned organizations, we are writing to request a meeting.

The purpose is to better understand the rationale and the supporting data for the recently announced Warehousing and Logistics Worker Initiative.

Our member companies and their associates were deemed essential during the pandemic and continue to be essential as the U.S. economy responds to the constraints of the global supply chain.

We agree with your statement in the February 8, 2022, press release:

> *These essential workers ensure medical supplies, construction materials, food and clothing, and many other necessities of daily life arrive where they are needed.*

We strongly disagree, however, with the suggestion that employers took advantage during the pandemic to deny benefits to their associates. Our members and their associates worked long hours during the pandemic and continue to do so to address supply chain constraints. It was and continues to be a team effort between employers and their associates to ensure that necessities of daily life continue to move through the supply chain.

The warehousing and wholesale distribution industries recognize the value of their employees as evidenced by data from the Bureau of Labor Statistics (BLS) reporting that wages and benefits in these industries are consistently generous. According to BLS data, in January 2022 the average hourly wage for production and non-supervisory workers was $28.46 in wholesale distribution and $25.05 in transportation and warehousing.

If there is credible information that some employers took advantage of their associates during the pandemic and the constraints of the global supply chain, we would like to see it. At the same time, if the available information shows that the overwhelming number of employers did not and do not deny benefits or engage in any of the inappropriate behavior your initiative describes, as we believe to be the case, we ask that you share that information with the public.

We would look forward to hearing back from you. Please have your staff contact Patrick O'Connor at 703/351-6222 or a patoconnor@kentoconnor.com to schedule the meeting.

Sincerely,

Auto Care Association
Ceramic Tile Distributors Association
Convenience Distribution Association
Foodservice Equipment Distributors Association
Gases and Welding Distributors Association (GAWDA)
Global Cold Chain Alliance
Heating, Air-conditioning, & Refrigeration Distributors International
International Association of Plastics Distribution
International Foodservice Distributors Association
International Warehouse Logistics Association
Metals Service Center Institute
National Association of Wholesaler-Distributors
National Grocers Association
National Insulation Association
National Marine Distributors Association
Outdoor Power Equipment and Engine Service Association
Pet Industry Distributors Association (PIDA)
Wine & Spirits Wholesalers of America