

From: [Clement Chang](#)
To: [ETA, OFLC Forms - ETA](#)
Subject: Agency Information Collection Activities for Application for Prevailing Wage Determination (OMB control number 1205-0508)
Date: Tuesday, May 26, 2026 11:04:56 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
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Dear Administrator Pasternak,

I am writing to comment on the published Agency Information Collection Activities for Application for Prevailing Wage Determination (OMB 1205-0508).

While I understand the Department of Labor's goal to protect U.S. workers from being unfairly discriminated against by bad acting employers who may be underpaying foreign workers, I don't think your proposed rule would fix the issue. I think your approach is overly broad and it would unnecessarily hurt a lot of U.S. employees and U.S. employers who are on the whole, following the rules as best as they can.

Instead, I would request the DOL to consider a more practical approach that is to enforce existing laws and use AI data to go after those bad actor/employers who have no qualms undercutting employee pay, no matter if they are U.S. worker or not.

I also think DOL has been using misleading information and wrong assumptions about how employers generally hire their workers – they are also trying to find the most qualified workers too. They know they have to set their wage at reasonable level in order to attract interested workers. We are in a market economy after all, where employers have to search for employees, and employees can decide whom they want to work for.

If you do proceed with this program, I also believe it will unnecessarily burden many U.S. employers (particularly small and medium size companies) who will bear the economic brunt of having to adapt to the new rules. They have to worry how this wage level change

will impact their business practices moving forward.

Instead of these drastic changes, perhaps DOL would consider modifying existing rules that are more in tune to the labor market conditions.

If DOL does decide to proceed, then I would request DOL to institute a reasonable period of transition for the U.S. employers, so that they can experience minimum negative impacts that this will new rule will surely bring to them and the local economy where they are based.

I thank your for your consideration and understanding in this matter.

Regards,

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