

Comment on Proposed Renewal of Information Collection Request; U.S. Department of Labor Office of Federal Contract Compliance Programs Recordkeeping Requirements—38 U.S.C. 4212 Vietnam Era Veterans' Readjustment Assistance Act of 1974, As Amended

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Comment: Obelisk Tech Systems Inc. (CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia — Rural, ~23% poverty, ~14% BA attainment) submits thirteen formal comments on OMB Control No. 1250-0004, VEVRAA Recordkeeping Requirements under 38 U.S.C. §4212, attached as thirteen documents. Submitted by: James Hunter Poole, Executive Chairman & CEO. ETAAC Nominee | DARPA SBIR HR0011SB20254-12 | 14-Patent Portfolio | DTIC AD1348980 | NIST 800-171 | ITAR DS-2032 | BIS SNAP-R S745686 | FinCEN MSB Registered | DOE Energy-AI Rural Defense Nexus. The attached comments establish that OFCCP's published estimate of 48.18 hours per contractor establishment is understated by 800–1,100%, reaching 4,300% for individual obligations. Comments address: (1) master clause-by-clause cost-benefit analysis with DOL CFO/CIO certification demands; (2) 3-year phased startup grace period for first-time contractors under 50 employees; (3) remote workforce establishment definition safe harbor; (4) unified electronic VEVRAA/Section 503/EEO-1 portal with AI-assisted compliance authorization; (5) four-tier size-scaled recordkeeping framework; (6) RFA/IRFA deficiency — no small entity analysis published; (7) subcontract flowdown reform raising the threshold from \$200K to \$1M for software/technology subs; (8) WOTC §51 veteran hiring credit expansion + VEVRAA/IRS coordination; (9) audit frequency cap and good-faith safe harbor for national security contractors; (10) PRA practical utility challenge — OFCCP must demonstrate measurable veteran employment outcomes; (11) master E.O. 12866/14192 demand with ten required deregulatory offsets and Congressional referrals; (12) DOE/Title 42 natural gas AI infrastructure — top 25 of 50 demanded USC §42 rule changes for natural gas-powered AI defense computation and rural energy write-offs; and (13) submarine systems integration and aerial drone (UAS) sole-source contract authority reform under 10 U.S.C. §2304(c)(1)/(c)(6) with VEVRAA compliance alternative track for national security sole-source programs. OMB must decline to approve this renewal until DOL CFO/CIO certifications, a full cost-benefit analysis, and a complete IRFA are published.

Comment includes 13 attachments.