

MASTER DEMAND — EO 12866 / EO 14192

Ten Required Deregulatory Offsets + DOL CFO/CIO Certifications + Congressional Referrals + Formal Decline to Approve

VEVRAA Recordkeeping | 38 U.S.C. §4212 | Due: MARCH 9, 2026 | regulations.gov

⚠ URGENT — COMMENT DEADLINE: MARCH 9, 2026 ⚠

File at regulations.gov | Docket OFCCP-2025-0100 | DOL-OFCCP, 200 Constitution Ave NW, Room C-3325, Washington DC 20210

Filer	James Hunter Poole, Executive Chairman & CEO — Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural, ~23% poverty, ~14% BA attainment)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI, Quantum Comms, Encrypted Comms, Submarine/Aerial Drone Systems
Standing	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB DOE Energy-AI Nexus
Entity	Delaware Corporation — Defense Technology CAGE 9S0L8 SAM.gov Active SBIR Applicant

I. SUMMARY OF THE THIRTEEN-COMMENT RECORD

Obelisk Tech Systems Inc. submits this Comment 11 of 13 as the master demand integrating Comments 1–13 into a formal E.O. 12866 / E.O. 14192 compliance demand. The aggregate record establishes: (1) OFCCP's 48.18-hour estimate is understated by 800–1,100%; (2) no cost-benefit analysis has been published; (3) no IRFA has been published; (4) no DOL CFO or CIO has certified practical utility; (5) the remote workforce establishment definition creates unbounded compliance risk; (6) the first-contractor compliance cliff creates a market barrier to small defense innovation; and (7) Comments 12 and 13 identify DOE and national security sole-source dimensions not addressed anywhere in OFCCP's submission.

II. TEN REQUIRED E.O. 14192 DEREGULATORY OFFSETS

E.O. 14192 requires 10 regulatory burden reductions for every new burden. Obelisk identifies the required 10 offsets for 1250-0004:

- 1. Three-year phased compliance grace period for first-time contractors under 50 employees (Comment 2).
- 2. Remote workforce safe harbor: remote-first contractors under 100 employees = single establishment (Comment 3).
- 3. Unified electronic portal: one submission satisfying VEVRAA + Section 503 + EEO-1 (Comment 4).
- 4. Template-based AAP safe harbor: OFCCP template accepted as presumptively compliant without legal review (Comment 4).
- 5. Four-tier recordkeeping framework: Tier 1 (under 25 employees) = one-page certification only (Comment 5).
- 6. Audit frequency cap: small compliant contractors audited no more than once every 5 years (Comment 9).
- 7. Good-faith penalty safe harbor: no NOV for recordkeeping deficiencies in first 3 years for good-faith contractors (Comment 9).
- 8. VEVRAA flowdown threshold raised from \$200K to \$1M for software/technology subcontracts (Comment 7).
- 9. AI-assisted compliance authorization: AI-generated AAPs accepted when contractor certifies accuracy (Comment 4).
- 10. VEVRAA/WOTC data coordination: VEVRAA ATS records satisfy IRS Form 8850 documentation (Comment 8).

III. E.O. 12866 COST-BENEFIT — TOTAL CONTRACTOR BASE

Applying Obelisk's documented per-establishment annual compliance cost of \$28,300–\$62,500 to OFCCP's 89,978 contractor establishments: total annual contractor-side VEVRAA compliance cost = \$2.54B–\$5.62B per year. Total 10-year compliance cost = \$25.4B–\$56.2B. OFCCP's published annual 'other cost burden' of \$356,313 is the agency's operating cost — it does not include a single dollar of contractor compliance cost. A collection that generates \$2.5B–\$5.6B in annual contractor costs must demonstrate equivalent or greater benefit before OMB approves the renewal.

IV. DOL CFO AND CIO CERTIFICATION DEMANDS

- DOL CFO: Certify the annual dollar value of VEVRAA enforcement outcomes — conciliation agreement value, back pay awards, and estimated additional veteran hires — attributable to records maintained under 1250-0004.
- DOL CFO: Certify the cost-per-additional-veteran-hire of the VEVRAA recordkeeping program. Publish this figure in the renewal record.
- DOL CIO: Certify whether a unified VEVRAA/Section 503/EEO-1 portal is technically feasible within 24 months. Certify the estimated build cost.
- DOL CIO: Certify whether OFCCP's current systems can process AI-assisted AAP submissions.

V. CONGRESSIONAL REFERRALS

- House Education and the Workforce Committee + Senate HELP Committee: Full VEVRAA recordkeeping modernization — tiered compliance, electronic portal, phased startup compliance, remote workforce definition.
- House Veterans' Affairs + Senate Veterans' Affairs: WOTC expansion for rural defense tech veteran hiring (Comment 8) and VEVRAA/WOTC coordination to eliminate duplicate recordkeeping.
- Joint Committee on Taxation: Rural Defense Technology WOTC category (\$9,600 per veteran hire in rural high-poverty census tracts) + VEVRAA recordkeeping credit (30% of compliance costs, capped at \$15,000/year).

VI. FORMAL DEMAND: DECLINE TO APPROVE

OMB must decline to approve the 1250-0004 renewal until: (1) updated burden estimates reflecting 800–1,100% understatement are published; (2) full E.O. 12866 cost-benefit analysis with DOL CFO/CIO certifications within 90 days; (3) full IRFA within 90 days; (4) the ten E.O. 14192 deregulatory offsets are adopted or rejection is justified with reasoned explanation; and (5) Congressional referrals for WOTC expansion, portal development, and tiered compliance are submitted within 30 days. Failure to address these demands reserves Obelisk's rights under 5 U.S.C. §706 and 5 U.S.C. §611.

Respectfully submitted,

James Hunter Poole

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14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

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