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April 21, 2021

Brian Pasternak  
Administrator  
Office of Foreign Labor Certification, Employment and Training Administration  
Department of Labor  
200 Constitution Avenue, NW, Room N-5311  
Washington, DC 20210

Re: Comment to “Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens in the United States: Proposed Delay of Effective and Transition Dates,” 86 Fed. Reg. 15154 (March 22, 2021) [DOL Docket No. ETA-2020-0006]

Worldwide Employee Relocation Council (Worldwide ERC®) strongly supports the delay until November 14, 2022 proposed in the Department of Labor (“DOL” or “the Department”) Request for Comments, “Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens in the United States: Proposed Delay of Effective and Transition Dates,” 86 Fed. Reg. 15154 (March 22, 2021) [DOL Docket No. ETA-2020-0006-2400]. Worldwide ERC® represents the people and businesses that facilitate the relocation and movement of talent. Our over 5,400 professionals include both corporations and service providers across Europe, the Middle East and Africa, Asia, and the Americas. Approximately 80 percent of our members are small- to medium-size businesses and our members come from a diverse range of professions and industries, including human resources, recruiting, military, real estate, financial services, moving, counseling, and consulting. We are where work is going.

On November 9, 2020, we submitted a [comment letter](#) to the interim final rule (“the rule”), “Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens in the United States,” in which we disagreed with several of the underlying principles justifying the need for changes outlined in the rule as well as the lack of opportunity for stakeholder input before the rule was finalized. On February 8, 2021 we submitted a comment letter to the request for comments in support of the delay of the effective date of the rule until May 14, 2021.

Worldwide ERC® believes that the Department can protect the U.S. workforce while at the same time facilitating access to foreign talent. The rule as written now would hurt the ability of U.S. employers to remain globally competitive and threaten a key component of U.S. economic performance. Postponing implementation of the rule would allow for proper stakeholder input and in the meantime maintain the status quo for employers as the rule is presently enjoined.

Should you have any questions regarding our comments, please do not hesitate to reach out to me by email at [rpeters@worldwideerc.org](mailto:rpeters@worldwideerc.org) or phone at 703-842-3400.

Requestfully submitted,

A handwritten signature in black ink, appearing to read "Rebecca Peters", written in a cursive style.

Rebecca Peters  
Vice President, Member Engagement and Public Policy  
Worldwide ERC®

*Worldwide ERC® is the professional association for employee mobility professionals. Since 1964, Worldwide ERC® has been committed to connecting and educating workforce mobility professionals across the globe. A global not-for-profit organization, we are headquartered in Washington, D.C., with offices in London and Shanghai, and are the source of global mobility knowledge and innovation in talent management from Europe, the Middle East and Africa, to Asia and across the Americas.*