



April 19, 2021

Mr. 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

Dear Mr. Pasternak:

ITServe Alliance appreciates the opportunity to comment on delaying the effective date of the rule entitled “Strengthening Wage Protections for the Temporary and Permanent Employment of Certain Aliens in the United States”, by eighteen months or until November 14, 2022.

ITServe Alliance was founded in 2010 to represent the collective interests of IT staffing/services companies who are part of the economic engine of this great country with job creation, job retention and job growth. ITServe Alliance is the largest association of IT services companies in the United States with over 1,200+ small and medium size member companies that generate over \$6 billion in revenue annually and represents 80,000+ employees.

ITServe Alliance supports delaying the effective date of the rule by 18 months or until November 14, 2022. Putting the rule into effect immediately, or even delaying the rule by 60 days, did not give the Department of Labor (DoL) time to consider how the rule change would affect our membership or give our members the opportunity to comment on the proposed changes. ITServe Alliance agrees that the DoL needs the extended time to perform a comprehensive review of the final rule that considers the issue from all sides of the equation. In addition, as the DoL completes the comprehensive review, efforts should be made to be as thorough and transparent as possible on all issues facing the final rule. Delaying the effective date should allow the DoL time to make available all technical studies and data it utilizes to reach a conclusion on the issue. It will also allow the DoL to solicit public input on other sources of data to amend its regulations regarding prevailing wages for certain visas.

We appreciate the opportunity to comment on delaying the effective date of the rule and look forward to continued communication with the DoL. Please contact Monte Ward at monte@itserve.org if you have any questions.

Sincerely,

Raghu Chittimalla
President
ITServe Alliance