



AMERICAN FOUNDRY SOCIETY
publishers of *modern casting*

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June 19, 2000

Mr. Jere W. Glover
Chief Counsel for Advocacy
U.S. Small Business Administration
409 Third Street, SW
Washington, DC 20516

Dear Mr. Glover:

In recent years, under your direction, the Small Business Administration's (SBA) Office of Advocacy, has proven to be a strong ally of the American Foundry Society (AFS) on many vital issues to our industry.

AFS serves as the largest and oldest association representing the metalcasting industry. Nationally, there are nearly 3,000 foundries employing over 230,000 people. Foundries are small business enterprises producing thousands of tons of different castings by recycling and utilizing metals such as aluminum, brass, bronze, iron and steel. In fact, 80 percent of foundries have fewer than 100 employees. The majority of these small shops are family-owned businesses that have been passed down several generations.

The Office of Advocacy has been a consistent and reliable source for our association to turn in order to obtain intervention in key rulemakings. Your staff has specifically assisted and intervened on our behalf regarding the Environmental Protection Agency's secondary aluminum MACT and the Occupational Safety and Health Administration's onerous ergonomics proposal.

Through the Small Business Regulatory Enforcement Fairness Act (SBREFA) of 1996, your office has provided small business a stronger voice in the federal regulatory process. In fact, following the small business panel session on ergonomics, the Office of Advocacy, brought to light some major deficiencies with OSHA's draft ergonomics proposal and the difficulty industry will have to comply with the rule.

The in depth cost analysis undertaken by your office on OSHA's ergonomics proposal placed the price tag to implement the rule at \$18 billion, well above OSHA's cost estimate of \$4.2 billion. Although you are a part of a government agency, your office did not shy away from unveiling some major problems with OSHA's ergonomics proposal.

On behalf of the 14,000 individual members of AFS, we applaud the Office of Advocacy's continued commitment and hard work for the metalcasting industry and small businesses across the country.

Sincerely,



Don E. Gaertner
AFS President