

March 30, 2023

The Honorable Shailen P. Bhatt
Administrator
Federal Highway Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Request for 90-Day Extension of Notice and Request for Comment on FHWA's Review of its General Applicability Waiver of Buy America Requirements for Manufactured Products (Docket No. FHWA-2022-0027)

Dear Administrator Bhatt,

Thank you for your leadership in implementing the historic Infrastructure Investment and Jobs Act (IIJA). The undersigned organizations, representing members who are dedicated to delivering transportation construction projects, respectfully request that the Federal Highway Administration (FHWA) provide for an additional 90 days (total of 120 days) for public comment on the notice.

We fully support the twin objectives of maximizing the benefits from the IIJA's historic investments, while growing domestic manufacturing. However, the 30-day comment period is inadequate for our organizations to meaningfully review the questions, analyze the impact of any possible changes, gather information and feedback from our members on several decades' experience with the waiver, and provide suggestions.

This notice for comments comes at a time when a lot of our organizations responded to the Office of Management and Budget's (OMB) recently proposed guidance (**88 FR 8374**) and are still analyzing how the proposed changes impact existing domestic manufacturing capabilities.

For these reasons, the undersigned organizations respectfully request an additional 90 days (120 days total) be allowed to provide public comments.

Sincerely,

Associated General Contractors of America
American Association of State Highway and Transportation Officials
American Concrete Pipe Association
American Council of Engineering Companies
American Highway Users Alliance
American Road & Transportation Builders Association
American Society of Civil Engineers
American Traffic Safety Services Association
Associated Equipment Distributors
National Asphalt Pavement Association
National Association of Surety Bond Producers
National Ready Mixed Concrete Association
National Stone, Sand & Gravel Association
National Utility Contractors Association
Portland Cement Association
Power and Communication Contractors Association
Surety & Fidelity Association of America
U.S. Chamber of Commerce
Water and Sewer Distributors of America