



**Independent Insurance Agents  
& Brokers of America, Inc.**

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October 18, 2016

The Honorable Lamar Alexander  
U.S. Senate  
Washington, DC 20510

Dear Chairman Alexander:

On behalf of the Independent Insurance Agents & Brokers of America (Big "I"), I would like to thank you for introducing S. 3464, the "Overtime Reform and Review Act." The Big "I" is the nation's oldest and largest trade association of independent insurance agents and brokers, representing independent insurance agencies in all 50 states.

The recently finalized Department of Labor (DOL) overtime rule, among other things, raises the minimum salary threshold to exempt employees from overtime and minimum wage requirements under certain "white collar" exemptions from \$23,660 to \$47,476. The new DOL rule also requires that the salary threshold be automatically adjusted every three years.

While the Big "I" does not oppose the intent to update the salary threshold of \$23,660, which has not been updated since 2004, the Big "I" opposes the excessive 100% increase and the automatic adjustments. The DOL regulation will have a major impact on independent insurance agencies, many of which are small businesses. It would reduce employee flexibility, limit the ability of insurance agencies to respond to consumers during emergencies, and increase operating costs and administrative burdens on agencies.

S. 3464 would delay the immediate implementation of the \$47,476 salary threshold, and instead phase in the threshold, which would help ease the burden on many small businesses who are impacted by this rule. Furthermore, S. 3464 would eliminate the automatic salary increases and require the DOL to go through the rulemaking process to update the salary threshold in the future. The bill recognizes that future administrations should update the overtime rules with stakeholder input, as they are required to under the Fair Labor Standards Act.

Once again, thank you for introducing this important legislation. If we can be of any further assistance to you or your staff, please let us know.

Sincerely,

A handwritten signature in black ink that reads "Charles E. Symington, Jr." with a stylized flourish at the end.

Charles E. Symington, Jr.  
Senior Vice President of External & Government Affairs