

OSHA question on reporting timetable:	Company answer
1. Should employers be required to file electronic reports monthly? Why? Why not? Estimated company costs?	
2. Should employers be required to file electronic reports quarterly? Why? Why not? Estimated company costs?	
3. Should employers be required to file electronic reports semi-annually? Why? Why not? Estimated company costs?	
4. Should employers be required to file electronic reports annually? Why? Why not? Estimated company costs?	

OSHA question on enterprise reporting:	Company response:
1. How hard is it for a multi-establishment enterprise to identify all of the establishments under its ownership or control?	
2. Are there types of multi-establishment firms or multi-level firms for which this would represent a greater burden than for others?	
3. Would the burden on multi-establishment enterprises to collect and submit their OSHA data be more, less, or the same as the burden to collect and submit data from their establishments to the EEOC?	
4. Which occupation or occupations would describe the employee(s) likely to perform the task of identifying all of the establishments under its ownership or control?	
5. How probable is it that the employee(s) likely to perform this task for OSHA's requirements would be performing the same task for the EEOC's requirements?	
6. Which occupation or occupations would describe the employee(s) likely to perform the task of collecting, compiling, and submitting the establishment-specific annual summary data from each establishment under the enterprise's ownership or control?	
7. How should OSHA define "ownership or control"?	
8. At least how many establishments should an enterprise have in order to be subject to a requirement for enterprise-wide submission of establishment-specific data?	
9. Would the burden of enterprise-wide collection increase as the number of establishments per enterprise increases, and if so, how?	
10. Should the requirement include a minimum establishment size? For example, the requirement could apply to enterprises with 5 or more establishments, but only if each establishment has 10 or more employees.	
11. Should the requirement include a minimum enterprise-wide employment size? For example, the requirement could apply only if total employment for the whole enterprise, including all of the establishments belonging to the enterprise, is 50 employees or more.	
12. To what extent do enterprises already collect establishment-specific injury/illness data from all of their establishments?	
13. To what extent do enterprises already collect other establishment-specific data from all of their establishments for the purpose of reporting the data to the government?	

14. Do enterprises generally know their corporate linkage identifiers (i.e., their Universal DUNS number)? How much additional burden would it be for the enterprise to provide this information?	
15. What special circumstances apply to organizations such as holding companies and private equity firms? Do these types of organizations play a role in the occupational safety and health of the companies they control?	
16. What other identifiers do enterprises currently use, or could enterprises use, for submitting data to the government?	

OSHA questions on electronic reporting.	Company response:
1. What are the implications of requiring all data to be submitted electronically?	
2. More current BLS injury and illness data will be available at the time of the final rulemaking. Use of newer data may result in changes to the proposed industry coverage. Should OSHA use the most current data available in determining coverage for its final rule?	
3. Would this leave affected entities without proper notice and the opportunity to provide substantive comment?	
4. Should the electronic submission requirement be phased in, with a paper submission option available for a certain period of time at the beginning for some or all of the establishments subject to the proposed rule, or should the electronic submission requirement take effect immediately?	
5. What are the implications of a phased-in electronic submission requirement versus an immediate electronic submission requirement for establishments subject to proposed § 1904.41(a)(1) Quarterly electronic submission of Part 1904 records by establishments with 250 or more employees?	
6. What are the implications of a phased-in electronic submission requirement versus an immediate electronic submission requirement for establishments subject to proposed § 1904.41(a)(2) Annual electronic submission of OSHA annual summary form (Form 300A) by establishments with 20 or more employees in designated industries?	
7. How should the electronic data submission system be designed? How can OSHA create a system that is easy to use and compatible with other electronic systems that track and report establishment-specific injury and illness data?	
8. Should the electronic data submission system be designed to include updates? § 1904.33(b) requires employers to update OSHA Logs to include newly-discovered recordable injuries or illnesses and to show any changes that have occurred in the classification of previously-recorded injuries and illnesses.	
9. How can OSHA use the electronic submission requirement to improve the accuracy of injury and illness records by encouraging careful reporting and recording of work-related injuries and illnesses?	
10. How should OSHA design an effective quality assurance	

program for the electronic submission of injury and illness records?	
11. What additional steps, if any, should the Agency take to protect employee privacy interests?	
12. Are there views on the issue of OSHA recordkeeping forms and confidential commercial information?	
13. Which categories of information, from which OSHA-required form, would it be useful to publish?	
14. What analytical tools could be developed and provided to employers to increase their ability to effectively use the injury and illness data they submit electronically?	
15. How can OSHA help employers, especially small-business employers, to comply with the requirements of electronic data submission of their injury and illness records? Would training help, and if so, what kind?	
16. Should this data collection be limited to the records required under Part 1904? Are there other required OSHA records that could be collected and made available to the public in order to improve workplace safety and health?	
17. For the proposed § 1904.41(a)(1) (Quarterly electronic submission of Part 1904 records by establishments with 250 or more employees), what would be the advantages and disadvantages of making submission monthly, rather than quarterly?	
18. For the proposed § 1904.41(a)(1) (Quarterly electronic submission of Part 1904 records by establishments with 250 or more employees), what would be the advantages and disadvantages of making submission annual, rather than quarterly?	
19. For the proposed § 1904.41(a)(1) (Quarterly electronic submission of Part 1904 records by establishments with 250 or more employees), is 250 or more employees the appropriate size criterion? How much burden would this impose on establishments with 250–500 employees? If the size criterion were lowered to 100 or more employees, how much burden would this impose on establishments with 100–250 employees?	
20. Should the designated industries for proposed § 1904.41(a)(2) (Annual electronic submission of OSHA annual summary form (Form 300A) by establishments with 20 or more employees in designated industries) remain the same each year, or should the list be adjusted each year to reflect the most current BLS injury and illness data? If so, how could OSHA best inform affected establishments about the adjustments?	
21. How can OSHA help employees and potential employees use the data collected under this proposed rule?	