



**MIKE CAUSEY**  
INSURANCE COMMISSIONER

June 26, 2024

The Honorable Julie Su  
Acting Secretary  
U.S. Department of Labor  
200 Constitution Ave., NW  
Washington, D.C. 20210

Dear Acting Secretary Su:

Thank you for considering the concerns I have regarding a proposed Occupational Safety and Health Administration rule, published February 5, that would replace the current fire brigades standard.

While we both share the goal of protecting the health and safety of our hometown heroes, the firefighters and first responders who respond to emergency calls, I am concerned that this proposed rule could have a negative, perhaps devastating, effect on the very people we are trying to protect.

Therefore, I am requesting that OSHA pause efforts to approve and implement this proposed rule.

Various analyses of this proposed rule have concluded that it could result in significantly increased costs for fire departments, including rural fire departments that are already operating on very limited budgets. This new rule could result in increased paperwork filing to comply with the regulation, as well as increased time spent on training, both of which could be detrimental to volunteer fire departments, many of which have little or no paid clerical staff.

As North Carolina's Insurance Commissioner and in my previous role as State Fire Marshal, I've fought hard to protect and improve the health and safety of our firefighters and first responders. During the Covid pandemic, I urged our governor and Health and Human Services secretary to give firefighters and first responders a high priority for receiving Covid vaccines. I worked hard to provide grants, both public and private, to our volunteer fire departments and rescue squads, much of which went to provide personal protective equipment. I worked to establish a firefighter cancer registry so that we could have better data to fight cancers disproportionately affecting firefighters.

I also understand the struggles that many volunteer fire departments in North Carolina face in getting and retaining volunteers. Many volunteer firefighters face family and career demands for

their time while struggling to meet training requirement so they can remain certified to help their fire departments protect their communities.

The cost this proposed new rule would add to local department budgets could be unattainable for many rural volunteer fire departments. The added training requirements could also make recruiting and retaining volunteers more difficult and result in fewer volunteers left to protect the safety of their communities.

With all these potential negative results of this proposed rule, I urge you, as Acting Secretary of the Department of Labor, and OSHA to halt further consideration of the new regulation. Perhaps the proposal can be modified and made more flexible to avoid the potential negative effects. Or perhaps we can seek other ways to make sure we're protecting our heroes who spend their time and effort protecting us.

I live in an area that is protected by a volunteer fire department. I am keenly interested in protecting firefighters and first responders.

I stand ready to work with you, your staff and OSHA on ways to protect the health and safety of firefighters and first responders that won't add undue expenses and training requirements on them.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Causey", with a long, sweeping underline that extends to the right.

Mike Causey  
North Carolina Commissioner of Insurance

cc: Governor Roy Cooper  
Senator Phil Berger  
Speaker Tim Moore