

TOP GUN TOW INC.

While we agree that heat stroke and heat-related illness are serious concerns and that safety measures must always be taken seriously, this proposed rule imposes unrealistic and unworkable mandates on industries such as Towing services. Our operations are inherently and unavoidably conducted outdoors.

The towing and recovery industry is 100% outdoor-based, except for the limited time operators are driving between calls. Our teams respond to accidents, breakdowns, and emergencies in extreme conditions—often under intense heat, at night, or during inclement weather. In New Mexico, the summer months are often the busiest time of year, due in part to the increased number of overheated vehicles and tire failures. Tourists are often stranded in out of the way locations, and do not have access to water, shade or assistance. Quick response is critical not just for the success of our businesses but for public safety. We do not have the luxury of delaying highway recoveries or emergency tows so that workers can wait out the heat. Doing so would endanger stranded motorists, worsen traffic conditions, and delay law enforcement or emergency medical services access to scenes.

We urge OSHA to reconsider and revise this rule to reflect the diversity of working environments across the country and to recognize that industries like ours cannot function under rigid, one-size-fits-all standards.

Thank you.

Charlene Gowers

Top Gun Tow Inc.