



March 31, 2014

The Honorable Todd Christopher Young  
U.S. House of Representatives  
1007 Longworth House Office Building  
Washington, DC 20515

Dear Representative Young:

On behalf of our more than 2,000 retail member companies, I am writing to urge you to support H.R. 2575, the Save American Workers Act, on the floor this week.

The National Association of Convenience Stores (NACS) is an international non-profit trade association representing the convenience and fuel retailing industry, which operates nearly 150,000 retail outlets in the United States, generated more than \$700 billion in sales in 2012 (approximately 4.5% of U.S. Gross Domestic Product) and employed 1.8 million workers.

A common characteristic among our members is that our business does not employ a traditional 9-to-5 workforce. Maintaining the ability to offer affordable coverage options to our unique workforces under the new requirements of the law is of special concern to us. The Affordable Care Act's (ACA) definition of full-time employee is of particular importance to convenience stores because of our industries' unique reliance on large numbers of workers with fluctuating and unpredictable work hours, as well as unpredictable lengths of service.

The current 30 hours per week, definition of a full time employee status is fundamentally unworkable for our members. It is critically important to change the law's definition of a full-time to something more in line with common employment practices. The current definition does not reflect employer's workforce needs or employees' desire for flexible hours.

HR 2575 fixes this flaw in ACA by redefining a full time employee as one who works at least 40 hours per week. Better aligning the ACA's definition of full-time employee status with current employment practices would help avoid unnecessary disruptions to employees' wages and hours, and would provide critical relief to employers. Increasing the ACA's rigid 30-hour per week definition for full-time status would:

- Make it easier for convenience retailers to provide more hours to all employees, thereby increasing their take-home pay;
- Help employers offer more generous health coverage to full-time employees without making employers' share of premiums cost prohibitive; and,
- Help ensure that lower-income employees have access to more affordable coverage options.

Using a definition of full-time that better reflects current employment practices would not cause employees to lose coverage. In fact, setting the definition of full-time employee status at a higher level would help eliminate a coverage gap for lower income employees in some states and make it easier for employees to increase their income by requesting work schedules according to their particular needs.

Although sharp differences in opinion about the ACA remain, well-intentioned people on both sides of the debate can agree that maintaining the full-time threshold many employers use today would be better for American workers and businesses than the ACA's lower full-time definition.

Once again, NACS encourages all Members to vote "YES" on H.R. 2575 this week.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Taets". The signature is fluid and cursive, with a large initial "J" and "T".

Jon Taets  
Director, Government Relations