



## INTERNATIONAL CARGO GEAR BUREAU, INC.

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CHARLES G. VISCONTI  
PRESIDENT

August 20, 2002

OSHA DOCKET OFFICE  
DOCKET NO. S-030  
U.S. DEPARTMENT OF LABOR  
200 Constitution Avenue, NW  
Room N-2626  
Washington D.C. 20210

OSHA  
DOCKET OFFICE  
DATE AUG 20 2002

S-030  
EX. 2-8

re: **USDL/OSHA 29 CFR PART 1926**  
**-Federal Register, Vol. 67, No. 136, Tuesday, July 16, 2002 (PROPOSED RULES)**  
**-Docket No. S-030**  
**-RIN No. 1218-AC01**  
**-Safety Standards for Cranes and Derricks in construction**  
**-Notice of Intent to establish a "Cranes and Derricks (in construction)  
 Negotiated Rulemaking Advisory Committee" (C-DAC)**

Ladies and Gentlemen:

In accordance with the SUMMARY section of the referenced Notice which "solicits comments on the initiative and requests interested parties to nominate representatives for membership on C-DAC" these comments and this nomination are offered for your consideration:

### COMMENTS

1. It is submitted that ICGB qualifies as having "interest" in this matter as a "safety organization" accredited by USDL/OSHA "to conduct... Maritime Gear Certification functions under the Regulations of Title 29, Part 1919, Gear Certification for Full Function Vessels, Floating Cranes and Derricks, Shore-based Material Handling Devices and Non-Destructive Examinations" (re: Paragraph II-B of the referenced Notice). For your convenient referral a copy of the current USDL/OSHA certificate of accreditation of ICGB is enclosed.
2. A six (6) panel leaflet "Summaries of ICGB Services" also is enclosed.
3. With regard to Section I-E of the referenced Notice it is recommended that "comparisons with the USDL/OSHA and the USCG rules in effect for similar cranes and derricks at other worksites (ie: longshoring, marine terminals, shipboard, aboard mobile offshore drilling units, etc.)" also be included as a "Key Issue for Negotiation" in order for the C-DAC to consider providing protection for construction workers on a basis that will be equivalent to the protection being provided for workers at other worksites for which USDL/OSHA and USCG rules are in effect.

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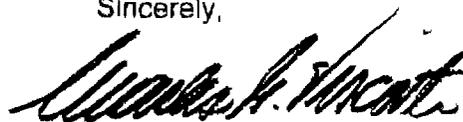
- 4. With further referral to that Section I-E it also is recommended that USDL/OSHA compile and provide for the information of the C-DAC what are the pertinent regulations currently being enforced by municipalities regarding the safety of cranes and derricks used in construction work.
- 5. It is requested that ICGB "be placed on the Committee mailing list" (re: Paragraph II-B of the referenced Notice).

**NOMINATION**

- 1. As facilitated by Section III of the referenced Notice, and based upon his more than forty (40) years of experience with myriad technical and regulatory aspects about cranes, derricks, and other lifting appliances including the privilege to have been appointed by the then Assistant Secretary of Labor/OSHA to serve as Chairman of the "ad hoc committee for Marine Terminal Facilities" (1974-1975), the undersigned Charles G. Visconti offers himself for your consideration as a candidate for membership on the C-DAC. A copy of his CV is enclosed.

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Sincerely,



Charles G. Visconti  
President

CGV:kb

cc: OSHA DOCKET OFFICE ✓  
WASHINGTON, D.C. fax #1-202-693-1648

cc: MS. NANCY FORD  
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