



**STEEL ERECTORS
SAFETY ASSOCIATION
OF COLORADO**

September 6, 2002

VIA FACSIMILE/Mail 202-693-1648

**OSHA
DOCKET OFFICER**

DATE SEP 13 2002

S-030
EX. 2-30

OSHA Docket Office
Docket No. S-030
U. S. Department of Labor
200 Constitution Avenue, NW
Room N-2625
Washington, DC 20210

Re: Docket No. S-030
Application for Membership on - C-DAC

Asst. Secretary of Labor Henshaw and Docket Officer:

SESAC, by action of a vote of its membership, hereby requests membership on the C-DAC committee. Our choice for representative is Steve Miller.

SESAC is an association made up of fifty members who are all involved in the steel erection and/or precast concrete erection business. As such, literally all members own, rent, or operate cranes on a regular basis. These fifty large and small contractors, represent over 1500 employees and several million man-hours of exposure to craning activity per year. Several members also own crane rental fleets ranging from five to fifty cranes providing custom crane Leasing services on a daily basis including two of the largest leasing/rental companies in this region. It is SESAC's position that no other trade or discipline in the construction industry and no other group of contractors uses cranes more than the steel erectors. The craning is a pivotal part of the process, and the rules affecting cranes will greatly affect the safety and the commerce of our industry.

SESAC consists of a mix on union and non-union members working together to improve safety in the industry. Union members of Operating Engineers Local #9 and Ironworkers Local #24 actively participate in the SESAC employee/management committee as part of the OSHA partnership guidelines. Union steel erectors and crane owners make up 20% of the total membership of SESAC with as many as 800 employees directly affected.

Please note that SESAC functions as or represents the following identified interests that are significantly affected by this rulemaking.

- Companies that repair or maintain cranes

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- Crane and derrick leasing companies
- Construction companies that use leased cranes and derricks
- Several general contractors (that also self erect their steel buildings)
- Subcontractors
- SESAC is a training organization including conducting crane and rigging training
- SESAC is a crane and operator testing organization
- SESAC is a safety organization
- SESAC manages insurance dividend buying groups within its membership
- SESAC is a trade association

SESAC has gained a Coalition Partner in the American Subcontractor Association, which has also agreed to join with us to request a seat on the committee and has also sent the Agency and endorsement and nomination for Steve Miller to represent their interests. Thus American Subcontractors Association adds the following and also represents additional large groups of the above significantly affected interests.

- General Contractors
- Subcontractors
- Crane and Derrick suppliers and distributors
- ASA is a Trade Association
- ASA Has insurance and Safety organizations as part of its services and structure
- ASA is a training organization

Please see the ASA nomination and endorsement letters for further information.

Also see the qualifications statements identifying representative examples of Steve's breadth of safety and crane experience and expertise and Steve Miller's Personal Profile attached.

SESAC hereby Authorizes Steve Miller to represent the interests of SESAC and its members as noted from the significantly affected interests identified above.

SESAC has received Steve's written commitment to actively participate and negotiate in good faith in the development of the rule. And, SESAC hereby makes its organizational commitment to participate actively in good faith, to give Steve Miller access to our membership and associates to insure that the C-DAC information and feedback is well disseminated and thoroughly covered and the C-DAC gets the greatest benefit from the broadest base of interested parties. SESAC hereby commits available resources of SESAC and agrees to support the C-DAC effort and Steve Miller's activities.

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Based on the above we restate our request for membership on the C-DAC committee and our request to have Steve Miller represent SESAC on the committee.

Very truly yours;



C. Rockwell (Rocky) Turner
President