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OSHA
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OSHA Docket Office
Docket S-030
U. S. Depart of Labor
200 Constitution Avenue
Room N-2625
Washington, DC 20210

S-030
EX. 2-31

RE: Nomination to the Negotiated Rulemaking Committee
Safety Standards for Cranes and Derricks
29 CFR Part 1926/1926.550

The American Subcontractors Association of Colorado (ASAC) is a trade association representing Colorado Subcontractors.

By action of the Executive Committee of ASAC, we respectfully nominate and endorse Steve Miller, President/Miller Safety Consulting, 5750 Pecos Street, Suite 6, Denver, CO 80221 to represent Colorado subcontractors on the Negotiated Rulemaking Committee for the Safety Standards for Cranes and Derricks.

Mr. Miller has over twenty-five years of experience in construction, craning and rigging management, and safety management. He has been an independent Safety Consultant for construction safety and health since 1990, specializing in general safety policy and program development, steel erection, rigging and safety programs, and fall protection specialization. Steve has developed and patented 2 Ironworkers and Riggers fall protection safety devices gaining wide usage in the USA. He has also taught thousands of safety and management hours on HazCom, Trenching, Rigging, Craning, Climbing and Ironworker Safety, General Safety Management Principles, and developed training videos for local contractors. He has written extensively on the subject of construction and crane safety including *Partnering in Construction*, McGraw Hill (Hardcover).

ASAC knows first-hand of the exposure that subcontractors have in the use of cranes and derricks and therefore trust that a seat on the committee will be awarded to Steve Miller.

Sincerely,



Debra L. Miller, Executive Director
American Subcontractors Association of Colorado

xc: Mr. Steve Miller, President, Miller Safety Consulting
ASAC Executive Committee