

VIA FACSIMILE/MAIL 202.693.1648

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

OSHA  
DOCKET OFFICER

DATE SEP 13 2002

TIME \_\_\_\_\_

S030

CR-231-1

RE: Negotiated Rulemaking for Crane Safety (C-DAC)

To Whom It May Concern:

In response to the request for information regarding affected parties and other potential interests found in section II subsection (B) on pages 4661-46615 of CFR Vol. 67 - #136, dated July 16, 2002.

The American Subcontractors Association of Colorado (ASAC) submits the following comments.

- Members of ASAC/subcontractors represent 80% of the individuals on a construction site.
- All subcontractors as a group are significantly affected by the proposed rule, they are exposed to cranes and lifting activities of other companies, but many do not actively use cranes.
- Most large commercial and multi family construction projects utilize a central crane service supplied by the General Contractor. The subcontractors utilize the service for hoisting on the job site.
- Safety issues arise for the subcontractor and include training on rigging, signaling and crane safety use.
- Some subcontractors utilize cranes through a broad spectrum; occasional use to full time use. And, virtually all subcontractors have exposure to crane use and their hazards, by those other trades that use cranes.
- Subcontractors are exposed to the craning of the General Contractor and other subcontractors that use cranes, but have minimal control or say on the matter.
- Because subcontractors make up the majority of construction work on any given jobsite, subcontractors must be considered as an additional "significantly affected" interest in this negotiation that are not otherwise represented in the list of affected interests provided by OSHA in the referenced CFR announcement.

ASAC submits that a committee seat should be dedicated to the segment of the construction community who make up the largest percentage of employees on a jobsite, which is the subcontractors!

I encourage you to expand the definition of "significantly affected interest" to include subcontractors and to insure that a seat on the committee is fairly representative of this majority group.

Respectfully submitted



Debra L. Miller, Executive Director  
ASAC