September 4, 2002

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

Re: Cranes and Derricks Negotiated Rulemaking Advisory Committee (C-DAC)

Dear Sir:

The American Subcontractors Association, a non-profit trade association representing subcontractors and specialty trade contractors, supports the nomination of Robert Weiss of A.J. McNulty & Company, Inc of New York, New York to serve on the Cranes and Derricks Negotiated Rulemaking Advisory Committee.

Mr. Weiss is an active member of our association. He would bring a hands-on knowledge of the subject along with the experience vital to the success of any negotiated rulemaking. For the past ten years, he has been Vice President of Cranes, Inc., one of the biggest and most diverse crane rental houses in New York. The fleet he oversees includes a wide variety of equipment including carry decks, tower cranes, as well as large all-terrain hydraulic cranes. In addition, Mr. Weiss' company has participated in the construction of many of the major buildings in the New York City area. Finally, because of his diverse experience, we believe Mr. Weiss would help the panel fulfill a number of interest categories specified by the agency. I have attached a copy of Mr. Weiss' resume.

In addition, our association continues to support the concept of negotiated rulemaking as a way to develop both consensus and workable rules. We encourage the agency will expand its use of this method.

Thank you for the opportunity to participate in this important process and we look forward to working with agency to develop this important regulation.

Sincerely,

James S. Turpin, CAE
Director, Government Relations

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