

Specialized Carriers &amp; Rigging Association



VIA TELEFAX: (202) 693-1648

September 16, 2002

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  
 Nomination for Membership – C-DAC**

To Whom It May Concern:

The Specialized Carriers & Rigging Association (SC&RA) hereby submits our nomination of Douglas E. Williams, Buckner Heavylift Cranes, for membership on the Cranes and Derricks Negotiated Rulemaking Advisory Committee (C-DAC).

SC&RA is an international organization representing more than 1,100 member companies in 43 countries around the world. SC&RA is committed to providing the unique information and any other lawful activities members need to safely, legally and profitably transport, lift and erect oversize and overweight items. Our members design, manufacture, own, rent and/or operate cranes on a daily basis. Several crane members own crane rental fleets ranging from five to over two hundred cranes providing crane services on a daily basis. Our membership is comprised of both union and non-union companies.

Following a tragic crane accident in San Francisco in November 1989 that resulted in five fatalities, including one pedestrian, a committee was formed within our association to address crane operator certification, which became the National Commission for the Certification of Crane Operators (CCO). CCO is an independent not-for-profit organization formed to establish and administer a nationwide program of certification for crane operators. The purpose of CCO

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is to set standards for the knowledge and proficiency required for the safe operation of cranes, and to develop valid and reliable examinations to test that knowledge. Several SC&RA members actively participate on CCO's Board of Directors and Commissioners, further showing our commitment to safety within the industry.

Our nominee, Mr. Douglas E. Williams, has over twenty-three years experience in the steel erection, crane rental, precast erection and heavylift business. Mr. Williams has served the industry in the following capacities: ironworker, job superintendent, project manager, equipment manager, estimator, general manager and currently, as vice president of Buckner Heavylift Cranes, a 55-year old steel erection, precast concrete and heavy lift and crane rental contractor. His company is consistently rated in the *Engineering News-Record's* top twenty steel erectors and listed as one of *International Cranes'* top fifty crane companies.

Mr. Williams is an active member of SC&RA's Board of Directors and previously served as Chairman of the Crane & Rigging Group within our organization. He is an original member of the Crane Operator Certification Task Force, which ultimately developed into the National Commission for the Certification of Crane Operators (CCO) and is a member of CCO's Practical Operators Exam Task Force. Mr. Williams has also served for the past three years as a member of ACCSH's Subpart N Workgroup, reviewing the current standard.

SC&RA will devote the support and financial investment necessary to ensure Mr. Williams' participation in the C-DAC process from beginning to end. As a representative of SC&RA, Mr. Williams will negotiate in good faith to help develop a crane safety standard that will improve crane safety in the construction industry.

There should be no doubt that SC&RA's members are affected parties and that our representation in this process is vital to them and to their businesses. Since it's inception, SC&RA has participated as a member of the ACCSH Subpart N Workgroup charged with reviewing and rewriting the standard. Along with Association staff, several SC&RA members have also participated on the Workgroup. Although not a voting member of the SENRAC Committee, SC&RA also actively served on the Safety Advisory Committee of the Structural, Ornamental, Rigging and Reinforcing Steel Industry.

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SC&RA believes the Committee needs input from individuals who have a genuine concern for worker safety and who possess the knowledge and professional expertise appropriate to standards-setting activities. We believe Mr. Williams to be extremely qualified for a position on the C-DAC Committee and respectfully request that SC&RA and our nominee, Mr. Douglas E. Williams, be appointed to represent the membership of SC&RA on the development of this important industry safety standard.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joel M. Dandrea", is written over the typed name below.

Joel M. Dandrea  
Executive Vice President

Enclosure: Resume, Douglas E. Williams  
cc: Douglas E. Williams  
Crane & Rigging Group Governing Committee  
Beth A. O'Quinn