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September 16, 2002

VIA FACSIMILE: (202) 693-1648

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

**OSHA
 DOCKET OFFICER**

DATE SEP 16 2002

TIME

S030

Ex. 2-45

**Re: Docket No. S-030
 Nomination for membership - C-DAC**

To Whom It May Concern:

The Steel Erectors Association of America (SEAA) hereby submits our nomination of Mr. George R. "Chip" Pocock, for a position on C-DAC to represent our Association on this important committee.

The Steel Erectors Association of America is a non-profit National Trade Association representing over 400 industry members both open-shop and union employers. Our Association is committed to improving safety in the steel erection industry and the construction industry. Our membership employees an estimated 7,500 directly affected employees, most of who work with cranes each and every work day. Our members are predominately small business who are involved in the steel erection and/or precast concrete erection business. As such, literally all members own, rent, or operate cranes on a daily basis. Several members also own crane rental fleets ranging from five to over two hundred cranes providing crane services on a daily basis to General Contractors, Trade Sub-Contractors, Municipalities, Utilities and General Industry.

Our nominee, Mr. George R. "Chip" Pocock has many years experience with OSHA in multiple facets. Mr. Pocock worked with the Baltimore area OSHA office in the early 1990's to develop a protocol whereby steel erectors in the Baltimore/Washington, DC area could employ multiple lift rigging and not be cited. This, then controversial issue, was serving to drive a wedge between the steel erection industry and OSHA. Much of this protocol is now incorporated in the new OSHA Steel Erection Standards.

Mr. Pocock has also assisted the North Carolina Department of Labor in training OSHA compliance officers on crane safety issues and taught crane safety classes to North Carolina State University construction engineering students. Mr. Pocock is a Certified Crane Operator by the National Commission for the Certification of Crane Operators (CCO) having attained certification in all four specialty categories and has operated many different types of cranes, trained hundreds of operators, managed a crane and rigging business, currently owns a crane inspection business where he performs annual safety inspections of approximately 100 or more cranes for some of the most respected crane rental companies and owners each year and has experience with crane accident investigation and defense of resulting OSHA citations. These qualifications along with Mr. Pocock's thorough understanding of the current OSHA Crane Safety Standards, the ANSI/ASME consensus standards covering cranes, and his knowledge of insurance issues, coupled with his understanding of the negotiated rule-making process, make him the best qualified individual to represent our membership. Chip has also served as an alternate on OSHA Subpart N Crane Standard Advisory Committee (ACCSH) and is a member of various national safety organizations. He is also a member of several regional safety organizations and a member of the Carolinas AGC Safety Committee.

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Although SEAA was not a voting member of the SENRAC Committee, our group actively served on many subcommittees and SEAA believes that our Association had as much of a positive impact on the development of this landmark negotiated rule as any other group including voting members. The SENRAC facilitator, OSHA officials and SENRAC committee members have stated openly that our association's positive commitment was crucial to the development of the new Steel Erection Standard. This is the kind of good-faith effort our Association put forth despite SEAA being denied a voting committee member slot. It should prove to OSHA that our association will work hard, negotiate in good faith and we will have just as positive an impact on the new Crane Safety Standards, as we did on the Steel Erection Standard.

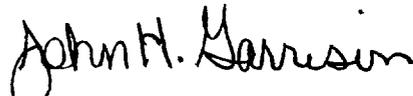
SEAA representation of many small open-shop erectors allows us to cover geographical areas where there is no union activity. For many of these members, SEAA is their only means of keeping informed and participating in this process. We are equipped to quickly poll our members for specific opinions and comments relative to our industry, thereby providing feedback on a national level relative to issues as the need arises.

Mr. Pocock also led the SEAA Safety Committee in producing a four video training program covering the training requirements of the new Steel Erection Standards. This program along with compliance guide featuring a CD-ROM with Power Point presentations, complete copy of the negotiated rulemaking process from the notice of intent to use negotiated rulemaking to the final standard, editable samples of site specific plans, job hazard analysis etc. is the most comprehensive training program available anywhere.

SEAA will devote the support and financial investment necessary to ensure that Mr. Pocock can participate in the C-DAC process from beginning to end. As a representative of SEAA, Mr. Pocock 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 our members are affected parties and that our representation in this process is vital to them and their employees, as most are small businesses. We have put forward an extremely qualified candidate and respectfully request that SEAA and our candidate Mr. Chip Pocock be appointed to represent the SEAA membership on the development of this important safety standard.

Respectfully submitted,



John W. Garrison, President
The Steel Erectors Association of America