

3/31/03



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 MAR 31 2003
Docket S030
Ex. 6-7

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To whom it may concern,

Please consider this correspondence in response to OSHA's request for comments relative to the recently named OSHA Standards for Construction - Subpart N Crane and Derrick Negotiated Rulemaking Advisory appointments.

It is my belief that the evaluation of the applications for appointment to the Negotiated Rulemaking Committee was performed very professionally yielding an outstanding group of individuals for the final Negotiated Rulemaking Committee assignments.

My one concern relative to the initial list is if individuals owning small to medium size business are adequately represented. Most often the type of individual I am referring to is part engineer, part accountant, part lawyer and part construction stiff. He is engaged in every part of the business including making sure there is enough money in the bank to cover the weekly payroll.

Although I personally know many of the individuals on the initial Negotiated Rulemaking Committee list there are a couple of individuals whose backgrounds I am not familiar with. I believe it is very important that at least 2 of the Negotiated Rulemaking Committee Members are actually owners of companies that use cranes as a compliment to their primary business. [steel erection, concrete placement, material handling, etc.]

I understand that qualifications relative to expert knowledge in crane set up and use, and crane safety are vitally important to producing a new standard. However, if the process of drafting a new standard is not done in an atmosphere where the ultimate responsibility of ownership is present then the process will not achieve the highest ultimate product.

If the OSHA team responsible for the Negotiated Rulemaking Committee appointments agree that company owners should be represented on the Committee and if the current list does not adequately represent company ownership then please consider Doug Williams of Buckner Heavy Lift Cranes [Buckner]. Doug is a 3rd generation owner of Buckner. He is also Vice President and General Manager of this Graham, North Carolina company.

Our goal is "simply to be the best".



While I was serving a Workgroup Chairman of the Subpart N Rewrite Workgroup Doug played an important role in our discussions. He is passionate but reasonable in his opinions. But more importantly he is experienced and knowledgeable in all aspects of crane use, and he brings the owner's perspective to the process. Williams would be an outstanding addition the current Committee list.

Thanks for considering this request.

Sincerely,

James Ahern
President of Ahern & Associates, Inc.
Former Chairman Subpart N Workgroup