



March 31, 2003

via fax to 202-693-1648

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

OSHA
DOCKET OFFICER

DATE MAR 31 2003

Docket S030
Ex. 6-9

Re: Crane & Derrick Negotiated Rulemaking Advisory Committee

Dear Sir or Madam:

ASA strongly recommends that the Specialized Carriers and Riggers Association (SCRA) should have a seat on the Subpart N committee. SCRA represents over 1100 crane industrial members and is a leader in promoting crane safety. Moreover, Doug Williams, their proposed candidate, served on the ACCSH work group, an experience that would be tremendously valuable on the Subpart N committee. He is well recognized in the industry and as General Manager for a large crane rental company is subject to the reality of any OSHA rules.

Furthermore, Mr. Williams is a company owner, which is an important perspective that is currently only reflected in a minor way on the committee. There may be persons on the committee who are members of SCR&A, but are not actual owner/users, who will be most directly affected by the regulation and subject to OSHA citations.

We urge you to include SCRA's candidate Doug Williams on the Subpart N Committee. Thank you for your consideration.

Sincerely,

Brian W. Cabbage
Construction Law & Contracts Counsel

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