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

Docket S030
Ex. 6-10

**Re: Crane & Derrick Negotiated Rulemaking Advisory Committee
C-DAC**

Dear Sir or Madam:

We feel strongly that the Specialized Carriers and Riggers Association (SCR&A) should have a seat on the Subpart N committee.

This group represents over 1100 crane industrial members and is a leader in promoting crane safety.

Doug Williams, their proposed candidate, served on the ACCSH work group and this experience will 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.

We do object to the inclusion of two representatives from the International Union of Operating Engineers. Mr. Williams has been heavily involved in the CCO program for operators and would represent a large number of open-shop operators. There are more open shop operators than union operators nationwide. Our information is that approximately eighty percent (80%) of the crane work is open shop, verses the twenty percent (20%) union. It would be a major mistake for these operators to not be properly represented. 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 SCR&A's candidate Doug Williams on the Subpart N Committee. Thank you for your consideration.

Respectfully submitted,

ABC of the Carolinas

Brett McMahon
Chairman