



2216 West Meadowview Road, Suite 115
Greensboro, North Carolina 27407-3408
Phone: (336) 294-8880 • Fax (413) 208-6936
E-mail: executivedirector@seaa.net

March 31, 2003

ecommments.osha.gov & fax: (202) 693-1648)

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

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

Dear Sir or Madam:

We feel strongly that the **Specialized Carriers and Riggers Association (SC&RA)** 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 SC&RA, 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 SC&RA's candidate Doug Williams on the Subpart N Committee. Thank you for your consideration.

Respectfully submitted,

John Garrison

Pamela W. Pocock

John Garrison, Past President

Pamela W. Pocock, Executive Director

The Steel Erectors Association of America

OSHA
DOCKET OFFICER
MAR 31 2003
DATE _____

Docket S030
Ex. 6-13