

Specialized Carriers & Rigging Association



VIA TELEFAX: (202) 693-1648

March 31, 2003

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

Re: Docket No. S-030**Notice of proposed Negotiated Rulemaking Committee membership – C-DAC**

To Whom It May Concern:

The Specialized Carriers & Rigging Association (SC&RA) respectfully requests the Agency reconsider our nominee, Douglas E. Williams, Buckner Heavylift Cranes, for membership on the Cranes and Derricks Negotiated Rulemaking Advisory Committee (C-DAC). SC&RA is extremely surprised and disappointed our nominee was not selected for this committee, as this standard will have a **great impact on our members**. After reviewing the C-DAC membership, it is important to note of the 20 people appointed, it is possible 12 of them may never be cited by OSHA for safety violations. This leaves 8 entities that could be.

There should be **no doubt** that SC&RA's members are affected parties and that our representation in this process is vital to them and to their businesses. Since its inception, SC&RA has participated as a member of the ACCSH Subpart N Workgroup charged with reviewing and rewriting the standard. Along with Association staff, several SC&RA members have also participated on the Workgroup, including Mr. Williams.

Our nominee, Mr. Douglas E. Williams, has over twenty-three years experience in the crane rental, precast erection and heavylift business. Mr. Williams has served the industry in the following capacities: ironworker, job superintendent, project manager, equipment manager, estimator, general manager and currently, as vice president of Buckner Heavylift Cranes, a 55-year old heavy lift and crane

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DATE MAR 31 2003

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rental contractor. His company is listed as one of *International Cranes'* top fifty crane companies.

As stated in our previous letter, Mr. Williams is an active member within the Association and the industry, serving on many committees and Boards. As a representative of SC&RA, Mr. Williams will negotiate in good faith to help develop a crane safety standard that will improve crane safety in the construction industry.

Additionally, Mr. Williams is a heavy lift crane user. He encounters situations on a daily basis that impact our industry. We believe he would be an asset to this committee and we would be remiss not to request you reconsider his nomination to this important Negotiated Rulemaking Committee. While we could have enlisted our membership to inundate your office with letters of support, we did not feel that it was necessary. We appreciate your reconsideration on this important matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joel M. Dandrea", is written over the typed name.

Joel M. Dandrea
Executive Vice President

cc: Douglas E. Williams
Crane & Rigging Group Governing Committee
Beth A. O'Quinn