



American Subcontractors Association of the Carolinas (ASAC)

March 31, 2003

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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. 6-15**

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

To Whom It May Concern:

The American Subcontractors Association of the Carolinas supports representation by the Specialized Carriers and Riggers Association (SC&RA) on the Subpart N Committee. ASAC supports SC&RA's proposed candidate Doug Williams. Mr. Williams is a member of the American Subcontractors Association of the Carolinas, has served on the ACCSH work group and his experience will be of great importance and value 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.

ASAC supports SC&RA's objection 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 and it would be a major mistake for these operators to not be properly represented.

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 ASA, 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 candidate Doug Williams on the Subpart N Committee. Thank you for your consideration.

With kindest regards,

Linda Burkett  
Executive Director ASAC

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