

Dear Committee Members; December 17, 2003

With regard to your committee objective, may I emphasize that the topic of securing mobile cranes to barges must be clarified. A September 22, 1994 ANSIB 30.8 letter of interpretation clearly answers any questions pertaining to this topic. Although Manitowoc does not recognize the letter because it is not contained within OSHA 1926.550 standards. Manitowoc states that they do not want their cranes chained or 'tied down' to a barge, only 'blocked & cribbed'. Other manufacturers do not issue such a clear statement and only state for the end user to 'follow all local, state and federal regulations'.