JUNTTAN

Docket S030
Ex. 49-3

U.S. Department of Labor
Occupational Safety & Health Administration
Directorate of Construction
Office on Construction Standards and Guidance
N-3468, Washington DC. 20210
The United States

RECEIVED
OSHA DIRECTORATE OF

17. February 2004

Att: Audrey R. Rollor, Esq.

Dear Audrey,

Junttan Oy, a Finnish private limited company, manufactures piling equipment in Finland. The piling equipment manufactured by Junttan Oy includes self-erect hydraulic hammer assemblies, hydraulic hammer piling rigs and self-erect drill rigs. All rigs manufactured by Junttan Oy include winches that are used as lifting devices.

Referring to the negotiations with Office on Construction Standards and Guidance we inform the following:

- It is our opinion that the rigs manufactured by Junttan Oy are not cranes or other lifting devises in the sense of OSHA Standards for the Construction Industry. Although these rigs do include winches for lifting purposes the rigs are designed for piling and drilling purposes only.
- In our understanding a major part of piling driving in the USA is performed using piling equipment that has been attached to cranes or other lifting devices. Such devices may be considered as cranes of other lifting devices.
- It is our opinion that in the USA there should be specific regulations and standards for the mechanical construction and function of also such piling and drilling rigs that have been specifically designed for piling and drilling only.
- For the purpose of enabling such regulations and standards to be established without delay and taking into the account that such specific piling and drilling rigs have certain mechanical similarities with cranes and other lifting devices and that they do include also lifting devices we consider it possible to handle specific piling and drilling rigs as cranes or other lifting devices in the OSHA Standards for the Construction Industry.

European Committee of Standardization has approved European Standards EN 996 and EN 791 for piling and drill rigs. We will send you later on few copies of the above mentioned standards.

Kindly contact us should you need any additional information or material.

JUNTTAN OY

Pentti Heinonen
Chairman of the Board