



Construction Company

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May 13, 2004

OSHA
DOCKET OFFICERDATE MAY 14 2004

Docket Office, Docket S-030
 Technical Data Center
 Occupational Safety & Health Administration
 U.S Department of Labor
 200 Constitution Ave, N.W.
 Washington, D.C. 20210

Docket S030
 Ex. 67-4

Comments on Docket No. S-030, Cranc Operator Certification

Our company operates for itself, and on a crane service basis, lattice boom friction cranes to 90 tons, hydraulic cranes to 50 tons and extending boom forklifts in northeast Iowa. Currently, all of our crane operators have received certified training in crane safety through AGC of Iowa and the Crane Institute of America, Inc. In part, we sponsor the training by providing to AGC and the Crane Institute some of the cranes used in the semi-annual class conducted here in Waverly at the Terex plant. We support responsible crane operations.

However, based on the information provided by AGC of America, I do not think that the rules now under consideration regarding crane operator certification will produce safer crane operations. To a degree, I think some of us are approaching crane operators as we have truck drivers: just as a commercially licensed driver is expected to safely drive any given truck we expect a certified operator to safely operate any given machine. Most of us in the business know better. No certification requirement will ever produce by itself safe crane operations. It can only provide a beginning.

An operator completing a course in crane safety is not necessarily a safe operator. During the testing phase of the classes we support, I have observed numerous operators who have successfully completed the written examinations, but who lack the innate ability to run a crane in a safe manner. More than in any operating skill, except possibly flying, the crane operator must be fully aware of his entire environment and his impact on that environment. His depth perception, physical coordination and mental foresight are more critical than in any other construction trade. No mandatory class will provide the potential operator the natural abilities required of a crane operator.

If certification is only a beginning and not an end, then let's make the process as accessible and as flexible as possible. Let's make companies want to participate. The singular failure of the

proposed rules is the restriction on the source of certification. Not only does a single source system constitute a monopoly, it does not provide the most effective or economical training mechanism. Even now, when certification is not universally required, too much training time is spent on generalities. I have received student comments that state that the course would have been more effective if the students could spend more time on the machines that their company uses. Students need to know more about specifics in a profession that deals with a multitude of company functions, machines brands, controls systems, draw works, load charts, transportation carriers, and equipment generations. Consequently, businesses avoid the cost of \$1500 and the loss of time of the one-week per year course.

After having supported the AGC/Crane Institute program for a number of years, I find that my operators are quite capable of teaching others. Conversely, my operators are not at a level to develop or prepare the program of instruction. As a compromise, the rules should require each company to have an operator/trainer certified to reasonable national standards by an outside source. The operator/trainer could then certify the remaining company operators in the national curriculum. The system of training the trainers has worked admirably in the nation's military and deserves consideration here.

The national curriculum should also be modified to reflect that we are training operators, not writers. As I stated above, there are many operators who can pass written tests, but remain unsafe practitioners. There needs to be more "hands on" work. But this would require assets beyond any single source. Again, we need to take advantage of the assets of the individual companies. Not only would the operator have more hands on time, he would get that time on the machines he would be expected to operate. There should be no charge to the companies for the curriculum material.

Operator certification can be a good start to safe crane operations. But it will be more successful if the requirements allow companies and their operators some local flexibility. Operators in particular will take the training more seriously if it relates to their local conditions, to their specific job and to something more than "book learning." Allowing for local training to a reasonable national standard will be the most effective.

Sincerely,
KEHE CONSTRUCTION CO



L. William Kehe, P.E.
President