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May 27, 2004

Mr. Noah Connell
Office Director Stds. and Guidance
Department of Labor
Directorate of Construction N-3468
200 Constitution Avenue, NW
Washington, DC 20210

Dear Mr. Connell

RE: Strain Gage Testing of Mobile Cranes

Link-Belt is in favor of keeping ASME B30.5 Design and Testing requirements for Lattice Cranes in effect as they have been since 1972. We also strongly recommend adding the ASME B30.5 requirement for Design and Testing requirements for Telescopic Cranes to OSHA 1926 for the future.

Link-Belt and all US Crane Manufacturers have been testing their new prototype cranes per ASME B30.5 for 30 years. The tests are the best solution to provide data for validation of the analysis and new designs. The test data can also be used to customize the analysis to provide improved predictability on future crane designs.

Some believe that testing is not needed due to recent improvements with computer analysis such as FEA. We agree that computer analysis has improved and it is a great design tool. Engineers and Designers create FEA models and make assumptions relevant to various loads and constraints consistent with sound engineering principles. But without test data, it is not possible to validate the computer analysis.

Link-Belt has business partners in Asia and Germany which include Sumitomo, Hitachi, Tadano, and Tadano Faun. These manufacturers are testing all Telescopic and Lattice cranes per ASME B30.5 to validate their analysis and designs. This includes large All Terrain Telescopic Mobile Cranes.

From our testing experience and our business partners testing experience, we believe ASME B30.5 should be included in OSHA 1926 to ensure the products are safe and fit for use in the United States.

Sincerely,

Bruce W. White
Vice President - Engineering

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