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OccupationalSafetyandHealthAdministration
U.S.DepartmentofLabor
200ConstitutionAvenueNW
Washington,DC20210
ConferenceRoomN-3437A,B,C

RE: CraneandDerrickNegotiatedRulemakingAdvisoryCommittee(C-DAC)
DocketNo.S-030

Gentlemen:

IwouldliketoofferthefollowingideastoassistOSHAandtheAdvisoryCommitteeinitseffortsto
providesafetytoworkersonandaroundcranes:

Ibelievethatweshouldutilizean“on-lineuniversity”suchasESC([BrentKatzer
ESCIndex,Inc.13160Foster,Suite110,OverlandPark,Kansas66213USA
913.814.7708\(phone\),913.814.8108\(fax\), http://www.escindex.com/contact.php
\(recommendedbyAGC\)](http://www.escindex.com/contact.php)) fortrainingandcertification.Thisallowsfortrainingand
certification24hoursperday,7daysperweek,and365daysperyear.Sinceitisso
flexible,available,inexpensive,andnon-intrusivetonormaloperations,itisthebest
methodofdeliveringtrainingandcertifyingthetraining.Thistrainingwouldbethe
educationalpartofthecertification.Thenon-jobtrainingbytheemployerwouldbethe
secondphase,offeredonlyaftertheeducationalcertificationwascompleted.Thecost
forthefirstphasecouldbelessthan\$10perperson.Thesecondphaseoftraining
(on-job)whichisactuallyhowallopersaretrained,regardlessofwhatonecallsit,
wouldbeadministeredbytheemployer’spersonneldepartment.Absentsucha
department(i.e.verysmallfirms),AGCcouldofferthetestingduringandaftertheon-job
training.

Theon-jobtrainingwouldbeaone(1)monthintensivetrainingprogramutilizingmentoringbyan
oldertrainedoperator.Afterthistraining,thementorwouldsignacertificateindicatingthe
operatorwasttrained.Thementorcouldbeastaffmemberofthecontractor,aretiredcrane
operator,oracraneoperatoractingasaconsultant.

A4-hourclassinOSHA safetywouldberequiredforthecertification.Thisshouldbeon-linewithan
outfitlikeESC,offeredbyAGC.

Oncetheoperatoriscertified,he/sheshouldbeableto“transport”thiscertificationtootheremployers,
butmightberequiredwhenchangingemployers,topaytheformeremployerasumof\$1,000for
thetrainingandcertification.

Anyaccidentpartiallyorwhollycausedbyanoperatorwouldresultinamandatory30-day
suspension.Aseven-dayrecertificationwouldberequired.

AnycertifiedoperatorwouldberequiredtodailyfillouttheOSHArequiredchecklistforthecrane,
includingdetailedinspections,verificationoffallrequireddailymaintenance,andcranelogs.
Failuretofilloutthepaperworkwouldrequirethattheoperatorbesuspendedfortwo(2)days.

AlleducationaltrainingwouldberequiredtobeinEnglishandSpanish(on-linetraining).

Anyphysicalormentalhandicapsthatwouldimpairtheabilityoftheoperatortosafelyoperatethe
machinewouldresultindecertification,ornocertification.

The employer would be required to properly certify all operators. Any uncertified operator would be required to have a properly trained mentor operator with him/her during operation of the crane for a 30-day period.

The certified operator would be required to have a wallet-sized card on his/her person at all times when operating (similar to a driver's license).

For efficiency and cost, no singular certifying company would be allowed to operate without AGC's approval. It is believed that many trainers would be necessary for practical reasons, and to disallow any singular outfit from monopolizing the system.

This is the computer age. Younger people are needed in the industry. They are best trained paper-wise on a computer. This training will be enhanced as time goes on, but the above outfit already has the capability of offering training for less than \$10 per person. The industry is short operators, and if retired operators were given an incentive to mentor younger trainees, it would be helpful to the economy, and the best training would be afforded. Finally, any training without OSHA safety modules would be inadequate, so this module should be added.

If you have any questions, please contact us.

Very truly yours,

Michael C. Welch
President