



**ASSOCIATION OF
EQUIPMENT
MANUFACTURERS**

**Docket S030
Ex. 69-3**

SERVING MANUFACTURERS OF CONSTRUCTION,
AGRICULTURAL, FORESTRY, MINING AND UTILITY EQUIPMENT,
AND INDUSTRY-RELATED SERVICE PROVIDERS.

Via fax 202-693-1689

July 7, 2004

**Mr. Russell B. Swanson, Director
Directorate of Construction
U.S. Department of Labor
Occupational Safety and Health Administration
200 Constitution Avenue, N.W., Room 3468
Washington, D.C. 20210**

RE: C-DAC Working Draft-Insulated Links

Dear Mr. Swanson:

The Power Crane & Shovel Association-Crane Technical Committee (PCSA-CTC) of the Association of Equipment Manufacturers (AEM) has met monthly by teleconference to review the Working Draft and progress of the Crane and Derricks Negotiated Rulemaking Advisory Committee (C-DAC). C-DAC member Michael Brunet (Manitowoc Crane Group), chairman of the PCSA-CTC led the discussions.

During today's meeting, members expressed concern that insulated links were included in the latest Working Draft. Member companies feel that NIOSH should conduct a Human Factors study to determine how the use of an insulated link affects actions of the crane operator. Inappropriate actions of the crane operator could increase the potential for powerline contact and subsequent exposure of injury to the ground crew.

Mr. Russell B. Swanson

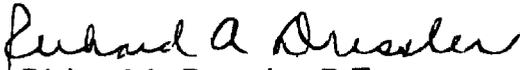
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July 7, 2004

On behalf of the PCSA-CTC, I would like to thank you and OSHA for your dedicated efforts in developing this important Crane Safety Regulation.

Very truly yours,

**Power Crane & Shovel Association
Crane Technical Committee**


Richard A. Dressler, P.E.
Secretary

RAD;jn

cc: Mr. Noah Connell, Manager
Construction Standards & Guidance, OSHA

Mr. Charles Gordon
Department of Justice-Office of the Solicitor



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FROM: AEM'S TECHNICAL & SAFETY SERVICES

DATE: July 7, 2004

**TO: Mr. Noah Connell, Manager
Construction Standards & Guidance, OSHA**

FROM: Richard Dressler

Number of Pages attached: (2)

Letter Attached.

