

Crane Power Line Safety Organization

Tel 202 -693- 2350
Fax 202-693-1648



OSHA Docket Office
Docket No. S-030
Department of Labor
200 Constitution Avenue NW
Room N-2625
Washington DC 20210

9 July 2004

Public comment to Subpart N for cranes and derricks

We would like to have included in the formal minutes of the meeting for the July session that during the public presentation by Hugh Pratt he said for the record:

“You have not **addressed** an issue – why not fit as standard insulating links to all new mobile cranes?”

The following is to be added to the docket for the benefit of subsequent determinations and review. The verbatim substance of this public comment:

“There is one question you have not addressed during the last year unless I was out getting a coffee.

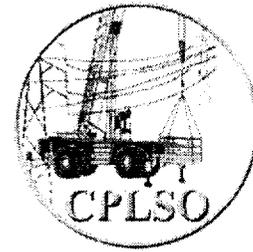
- You know that 1 in 8 of all US crane fatalities could have been avoided if an insulating link we fitted.
- You know that fitting an insulating link as standard could even reduce the cost of a new crane.
- You know that ‘insulating links have been proven to be effective devices to prevent electrocution’.
- You know that safety equipment on cranes, equipment and tools may never be used during the life of a product – consider ABS, seat belt etc.
- You know that there is no intellectually sustainable argument or evidence to support the ‘Dependency Theory’ except for Chattanooga Sam.
- You know that you have been asked in public comment from industry experts, attorney and bereaved parents to mandate links on all cranes.
- You know that there was a Federal Law 8C-29 mandating insulating links.

You have not **addressed** an issue – why not fit as standard insulating links to all new mobile cranes?”

www.cranepowerlinesafety.org

The Marchioness Building, Commercial Rd., Bristol BS1 6TG. UK
Tel +[44] 117 9252300 Fax +[44] 117 9254555

Crane Power Line Safety Organization



There was no question or challenge by any committee member to the above statement after being offered the opportunity to question.

Yours sincerely,

Hugh Pratt
Chairman of Crane Power Line Safety Organisation
www.cranepowerlinesafety.org

www.cranepowerlinesafety.org

The Marchioness Building, Commercial Rd., Bristol BS1 6TG. UK
Tel +[44] 117 9252300 Fax +[44] 117 9254555