

OSHA Docket Office

ID: LFG-2018-0026

c/o RIN No. 1218-AC86

Technical Data Center, Room N-3653

Occupational Safety and Health Administration

United States Department of Labor

200 Constitution Ave. NW

Washington, DC 20210

June 19th, 2018

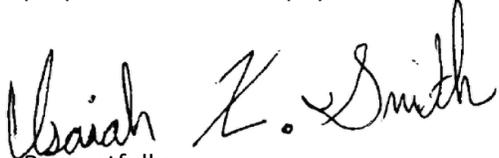
Re: Docket Number, OSHA-2007-0066

Dear United States Department of Labor,

The Occupational Safety and Health Administration (OSHA) of the United States Department of Labor proposes to update its standard for cranes and derricks in construction by permanently extending and clarifying each employer's duty to ensure the competency of crane operators through required training, certification or licensing, and evaluation. The Occupational Safety and Health Administration (OSHA) is also proposing to remove an existing provision that requires different levels of certification based on rated lifting capacity of equipment. This proposal would clarify that while testing organizations are not required to issue certifications distinguished by rated capacities, they are permitted to do so. Finally, it would establish minimum requirements for determining operator competency. The Occupational Safety and Health Administration (OSHA) believes that this proposal would maintain safety and health protections for workers while reducing employers' compliance burdens.

I would like it to be clear to you all that I am in opposition to this proposal by the Occupational Safety and Health Administration (OSHA) of the United States Department of Labor. I believe that your office has received communication from individuals that are a part of the propane industry, in which are mostly in opposition to this proposal by the Occupational Safety and Health Administration (OSHA) of the United States Department of Labor. I would have to agree with them on this issue. I believe that your proposal will be costly and will be hard to enforce. I further believe that your proposal will be costly to the taxpayers and to consumers. I believe that this will especially occur to propane dealers, due to the fact that most propane dealers are small business companies. It is a fear that small businesses that are propane dealers will not be able to afford the cost of being in compliance with the proposal from the Occupational Safety and Health Administration of the United States Department of Labor. I believe that the best way to solve this issue, us by the Occupational Safety and Health Administration of the United States Department of Labor allowing the states to have the final say on this issue. I do not believe that this issue has been a safety issue in the past and I am curious as to the reason why this is now an issue when this issue has not been a safety issue in the past, to the best of my knowledge and understand. I hope that officials with the Occupational Safety and Health Administration (OSHA) of the United States Department of Labor will become in opposition to the compliance deadline for the certification requirement and that you all will look into how much this proposal will cost propane dealers, in which

are most small businesses, whether or not this has been a past safety issue and the cost that this proposal will be to taxpayers and to consumers.


Respectfully,

Isaiah X. Smith¹

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