

March 12, 2014

Docket No. OSHA 2010-0034
The Honorable David Michaels
Assistant Secretary of Labor
Occupational Safety and Health Administration
U.S. Department of Labor
Room S-2002
200 Constitution Ave., NW
Washington, DC 20210

Re: Comments to NPRM on Cranes and Derricks in Construction: Operator Certification (Docket No. OSHA-2007-0066)

On behalf of the more than 6,000 members of the American Road and Transportation Builders Association (ARTBA), I respectfully offer comments on the Occupational Safety and Health Administration's (OSHA) proposed rule on "Cranes and Derricks in Construction: Operator Certification."

ARTBA's membership includes private and public sector members that are involved in the planning, designing, construction and maintenance of the nation's roadways, waterways, bridges, ports, airports, rail and transit systems. Our industry generates more than \$380 billion annually in U.S. economic activity and sustains more than 3.3 million American jobs. The health and welfare of our workers is paramount and ARTBA has received numerous OSHA grants to develop training programs that are designed to improve workplace safety in the transportation construction industry. A diverse number of training materials have been developed including hazard communication, struck-by, fall protection, trenching and health hazards.

ARTBA applauds OSHA's decision to extend the deadlines for operator certification and employer training requirements by three years to November 10, 2017. These duties include ensuring that crane operators are trained and competent to operate the crane safely. We also urge OSHA to carefully examine and clarify third party certification and employer qualifications, especially those surrounding the type and capacity of cranes for operator certification, as this process moves forward.



We continue to look forward to working with OSHA to achieve a healthier workforce. Through mutual respect and understanding, we believe we can continue to protect the health and safety of workers in the transportation construction industry, while meeting our nation's infrastructure needs.

Sincerely,

A handwritten signature in black ink that reads "T. Peter Ruane". The signature is written in a cursive style with a large, stylized initial "T".

T. Peter Ruane
President and C.E.O.