



National Commission for the Certification of Crane Operators

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OSHA Docket Office
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U.S. Department of Labor
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Ref: OSHA Docket No. OSHA—2007—0066

To Whom it May Concern:

The National Commission for the Certification of Crane Operators (NCCCO) writes in support of OSHA’s proposed rule that would extend the date by which its crane operator certification requirements would come into effect, from November 2017 to November 2018.

NCCCO is a non-profit organization established by industry in 1995 to develop and administer professional certification examinations for crane operators and related personnel. Since that time, more than one million CCO examinations have been administered to 240,000 individuals, resulting in the issuance of over 350,000 nationally accredited certifications in 25 certification categories. NCCCO was formally recognized by OSHA in 1999 and is accredited by ANSI to the international standard ISO 17024 to provide personnel certification programs.

NCCCO understands that the extension to the enforcement date that OSHA seeks would allow time for the Proposed Rule that OSHA has reportedly completed—but that has not yet been published—to complete its journey through the regulatory review process and to be published in the Federal Register for public review and comment. This Proposed Rule, it is understood, would clarify the role of certification in employers’ efforts to ensure their employees are qualified, and remove the requirement that crane operators be certified by capacity as well as by type of crane.

NCCCO offers this support for a one-year delay *reluctantly* and only in response to OSHA’s stated need for additional time to ensure passage of a Proposed Rule and, ultimately, a Final Rule that will address these two issues. Since the positive impact of professionally developed, third-party accredited crane operator certification on the incidence of deaths and injuries caused by crane accidents has been amply demonstrated during the more than 20 years that NCCCO has



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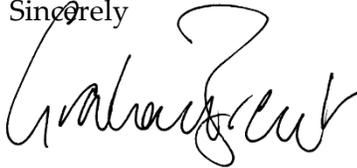
been providing it (see, for example, *Cal-OSHA Study of Crane Accidents*, 2008) every delay means that this nation's workers continue to be exposed to risks that would otherwise have been mitigated.

It should also be noted that these benefits have been proven primarily through certifications that have been issued *by type alone* and when they have been used as a *component* (not the exclusive determinant) of an employer's qualification process.

NCCCCO also agrees with OSHA's related proposal to also extend the requirement for employers to ensure that crane operators are trained and competent to operate cranes safely.

Given the continued uncertainty among operators and employers regarding OSHA's ultimate requirements for crane operator certification, NCCCCO urges OSHA to act with all speed to ultimately issue its Final Rule well within the extension year on this vitally important safety issue, so that this matter may be resolved once and for all, for the benefit of industry as a whole.

Sincerely

A handwritten signature in black ink, appearing to read "Graham Brent". The signature is fluid and cursive, with a large initial "G" and "B".

Graham Brent
Chief Executive Officer

cc.

Loren Sweatt, Deputy Assistant Secretary of Labor for Occupational Safety and Health
NCCCCO Board of Directors
NCCCCO Commissioners