

#2616

-----Original Message-----

From: Bill Sydnes [mailto:bsydnes@comcast.net]

Sent: Friday, April 25, 2008 4:55 PM

To: jdillabaug@state.pa.us

Subject: Proposed rulemaking Changes

John,

As an owner/operator and PA Class 2 inspector who is focused strictly on the equipment we own and operate, I know my equipment "like the back of my hand". I know every squeak, vibration, or other operating nuance of the equipment. I also know if it is not operating properly; however, I perform my inspections and maintenance per the rigorous standards of the manufacturer and the Commonwealth of PA. It is my best interest to insure the equipment is well maintained and safe and I will not compromise operations for safety! We conduct a rigorous operator safety training program and have our operators under video surveillance to insure they adhere to our strict safety standards.

Adding a training requirement which requires more than a week "away for the business" is a significant hardship for owners such as I. The current PA training and continuing education program is excellent and should be sufficient for re-certification. I can understand and support an additional requirement for "newbie" inspectors; however, if they receive certification and are active in the field a continuing education of 3 "elapsed days" (however many hours you wish to put into 3 days) should be more than sufficient.

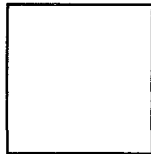
Additionally, I recommend that when you reference a training program in an e-mail, newsletter or brochure, please provide direct contact information (not just the main web site) as to how to contact the person/organization conducting the training (include contact name, phone number, e-mail address, and web address).

Thank you for the opportunity of communicating my comments.

Best regards,

Bill

**President and CEO
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