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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
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July 15, 2010

Mr. Kim Kaufman
Executive Director
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: State Board of Crane Operators
Proposed Regulation 16A-7101: Initial General Rulemaking

Dear Mr. Kaufman:

On behalf of the House Professional Licensure Committee, we are submitting the following comments on proposed Regulation 16A-7101: Initial General Rulemaking from the State Board of Crane Operators:

1. The Committee brings to the Board's attention that proposed Regulation 16A-7101 was published in the June 5, 2010 issue of the *Pennsylvania Bulletin*. Section 501 of Act 100 of 2008 which addresses "Licensure of crane operators" becomes effective on October 9, 2010.
2. The Committee requests an explanation as to how the Board will enforce Section 501(a) of the Act. It reads: "Except as provided in subsection (c) (relating to trainees), an individual may not operate a crane, offer himself for employment as an individual who may operate a crane or hold himself out as a crane operator unless licensed by the board." What happens in the likely circumstance that final rulemaking does not occur before October 9, 2010?
3. The Committee recommends that the Board identify and review other possible certifying organizations. If the Board has already done so, please provide for each the rationales for their lack of equivalency to the National Commission for the Certification of Crane Operators (NCCCO).
4. The Committee raises concern regarding the various overlapping time periods that a licensee must juggle to maintain licensure, i.e. the biennial renewal period for a license, the certification every 5 years, etc.

Sincerely,


Michael P. McGeehan
Chairman, House Professional Licensure Committee


Julie Harhart
Republican Chair