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# Stephenson Equipment, Inc.

Harrisburg, PA Lancaster, PA Wilkes-Barre, PA Pittsburgh, PA Philadelphia, PA Syracuse, NY Albany, NY Aberdeen, MD (service only)

June 21, 2010

Dear IRRC Commissioners,

I am writing this letter as a public comment in support of regulation 16A-7101 as it is written and the NCCCO crane operator certification.

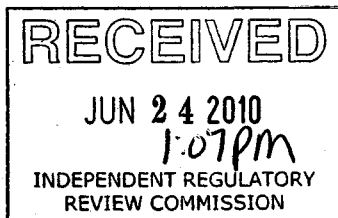
My name is Robert M. Criste. I am the VP/CFO and shareholder of Stephenson Equipment, Inc. headquartered in Harrisburg, PA.

As a full service dealership selling, renting and servicing new and used cranes we saw the need in having crane operators that are well trained and qualified. This same need was seen by many other contractors, trade organizations, labor unions, insurance companies, general contractors, etc.

Because of this, many crane dealers, trade organizations, contractors, crane manufacturers, labor unions, insurance companies, and end users got together in the 90's to discuss a way to "qualify" crane operators. This discussion led to the development of the National Commission for the Certification of Crane Operators, NCCCO. The NCCCO was developed out of a grassroots desire to improve the safety of the craning industry in the country. It was and still is supported by crane manufactures, crane dealers, construction companies, general contractors, trade associations, labor unions, insurance companies, and end users.

The NCCCO was developed as a not for profit organization that is governed by a board of directors made up of volunteers throughout the crane industry in the country. The purpose for the NCCCO was to develop a crane operator certification program that would be able to be used as a means to determine crane operator proficiency. The program had to include and test every crane operator qualification as listed in the current ASME B30 standards, all pertinent OSHA regulations, and all time tested craning principles and procedures. There was no other crane operator certification in the country at that time that met all of these rigorous standards. So, the development of the NCCCO crane operator certification was a painstaking process that was accomplished by committed people in the craning industry. Since the development of the NCCCO, it has become the standard by which states, general contractors, construction companies, etc. judge the proficiency level of crane operators.

As a company that has sponsored the NCCCO certification program from its beginning, we have seen the impact this certification has had on the crane industry. The development of the NCCCO certification has caused: crane operators to be better trained; crane operators to become aware of the things that they did not know; set a proficiency level for crane operators to meet that was never expected before; and because of this, accidents have steadily been on the decline.



Respectfully submitted,

Robert M. Criste, VP & CFO

Stephenson Equipment, Inc.



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