

**Crandy, Barbara**

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**From:** Bob Johnson [boblinjohnson@yahoo.com]  
**Sent:** Friday, July 02, 2010 11:35 AM  
**To:** McNally, Christopher  
**Cc:** craneinstituteofamerica@craneinstitute.com; ddickinson@cicert.com  
**Subject:** Comments concerning 16A-1701 for IRRC

Dear Mr. McNally,

I would like to submit a comment for the IRRC concerning the wording of regulation 16A-7101. The wording in part 6.52 eliminates every crane operator certification provider, except NCCCO, from doing crane operation in the state of Pennsylvania.

I suggest the state of Pennsylvania should not be dediting what organization that crane operators need to be certified.

I suggested the state of Pennsylvania just needs to states that the crane operator must have a valid certification from a provider that provides NCCA or ANSI accredited certifications, is recognized by OSHA, tests on cranes relevant to the cranes the operator operates, and tests on OSHA regulations, ASME B30 Standards, and safe crane operations.

In addition, I suggest that the final version of the law lists all NCCA or ANSI accredited providers simultaneously. The simple wording is clear and allows other accredited certification providers, CIC certified crane operators, to compete for your business. It requires your certification to meet strict standards of excellance so that you have a nationally recognized and valid requirements for crane operators.

Thank you for considering this information as you move forward with this regulation.

Sincerely,

Bob Johnson  
CIC certified crane operator  
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