## McNally, Christopher



INDEPENDENT REGULATORY REVIEW COMMISSION

From:

Nathan Schiermeyer [NSchiermeyer@maintainer.com]

Sent:

Thursday, July 01, 2010 2:22 PM

To:

chrmcnally@state.pa.us.

Subject: comment for the IRRC (Independent Regulatory Review Commission) regarding proposed law 16A-

I think the proposed law is unfair, and honestly unconstitutional. Picking one agency over another of equal value is unethical.

I would propose the following:

Crane Operators 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 would suggest that the final version of the law lists all NCCA or ANSI accredited providers simultaneously.

Thanks, Nathan Schiermeyer

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