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Comments to Post on Proposed Law 16A-7101

My name is James Headley. I am owner of the Crane Institute of America (CIA), which is considered one of the premier training companies in America. I am also one of 13 Governing Committee members for Crane Institute of America Certification (CIC). Even though the names are essentially the same they are separate legal entities and independent of one another in operation and decision making. I am often overruled by the other Committee and Board members. CIC administers crane operator certification tests that are recognized by Voluntary Agreement by Federal OSHA and are accredited by the NCCA, a nationally recognized accrediting organization. Governing Committee and Advisory Board members are elected by majority vote of members who are also industry experts and peers.

I started my career regarding cranes right out of high school more than 40 years ago. During this time I was an active member of the Operating Engineers Union for 16 years and worked as an oiler on cranes and as a crane operator for numerous companies. In 1984 I started working as a trainer in the crane training industry and in 1987, I founded the Crane Institute of America. During this time period I have served on the ASME B30 main committee and various subcommittees including the B30.5 which covers Mobile Cranes. I have also written numerous articles on crane safety, authored books titled Mobile Cranes and its companion volume on Rigging. In addition, I have testified in both state and federal courts where I never failed to qualify as a subject matter expert on cranes.

To put the question to rest regarding training and certification, I do not, nor do any of the trainers for the Crane Institute have access to CIC exams or exam content. Training is necessary, as Federal OSHA recognized in writing. Without proper training, crane operators have little chance of learning the best safety practices for operation. However, training activities and the certification process are kept secure from one another. Certification exams are managed by our testing partner, 4ROI. Exams are not available in our building, or on our server. If we want to sign up candidates for exams, they are registered and administered through 4ROL like everyone else. The process has high integrity and is secure.

In addition, CIC exams are backed by in depth job analysis and numerous other validation studies that were conducted independently. CIC exams are audited at several levels, at a fraction of the cost charged by competing certification providers. CIC can bring value, save time and reduce costs for the State of PA, and, without question, provide quality certification testing that meets the highest and most exacting Standards for testing. We hope that the proposed law, 16A-7101 will be rewritten to allow and approve each ANSI <u>or</u> NCCA accredited certification provider that is recognized by OSHA to compete on an equivalent basis for the privilege of serving the people of PA. There is no value or credible argument for promoting one organization (the most expensive) and outlawing competition when PA can have organizations competing to do the best possible job for the people.

Sincerely,

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