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International, Ltd.



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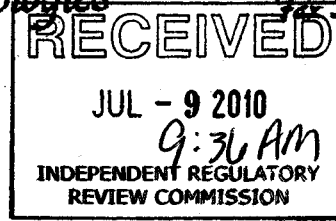
Managed Crane Technologies

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Mr. Christopher McNally, Esq.
Pennsylvania State Board of Crane Operators
Commonwealth of Pennsylvania
Bureau of Professional & Occupational Affairs



July 6, 2010

Re: Comments on proposed law 16A-7101, authorized by PA State Board of Crane Operators

Mr. McNally,

I am pleased to submit the following for the Board's consideration, subsequent to the recent exchange of observations, thoughts and ideas that were both informative, thought provoking and enlightening. It is pristinely clear our goal is mutual; enhanced crane operation safety.

I have had close association with the organizations seeking Board Accreditation affording unusual insight. I have provided volunteer service to all without prejudiciuos and remained labor neutral.

I respectfully request these comments be included in the review and posted on this topic for the IRRC.

A career of six decades plus in the crane and rigging industries has provided a wide and varied experience, honed to a level of rare insight. An approximately equal proportion of this career was spent in the private sector, i.e. Maritime Construction and Shipbuilding Industry, and Federal Service, i.e. The Naval Facilities Engineering Command, (NAVFAC). Subsequent to separating from Federal Service, (NAVFAC), I forms and incorporated in the State of Delaware, RZP International Limited, "Managed Crane Technologies" (RZP). Currently over the past fifteen years RZP has provided consultation services successfully to both private and Federal sectors including O.S.H.A..

In the private sector, my duties, responsibilities and authority encompassed field and managerial positions in every echelon of craning and rigging related to Maritime Construction and Shipbuilding. Specifically, piers, wharfs, cofferdams, drydocks, shipways, bridges, foundations, commercial and Naval Ships.

During my tenure at the Naval Facilities Engineering Command, (NAVFAC), I managed the office tasked with the Maintenance & Management of Weight Handling Equipment Office; (WHEO) cranes for the Shore Based Naval Facilities worldwide. My office designed, procured, installed, tested and provided maintenance instructions for cranes. Crane Operator Training, testing and license was also under the preview of the W.H.E.O.. The W.H.E.O. was closely aligned in support of the Navy's Nuclear Propulsion Program and provided consultation to other agencies such as, Atomic Energy Commission, Army Corps of Engineers and Federal O.S.H.A., etc. Also at this time I became associated with American Society of Mechanical Engineer's

(ASME) B30 Safety Standards for Cableways, cranes, derricks, hoists, jacks and slings. I have remained a member of the B30 Main Committee and currently function as Chairman. A position I have held for a quarter century. The B30 Committee provides Industry Consensus Standards that are adopted by Federal O.S.H.A.

With that being revealed, the following is offered:

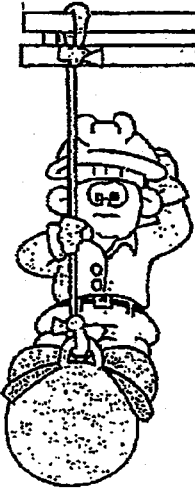
- Current language provides for a monopoly. A monopolistic circumstance benefits no one.
- No standard exists for crane operator certification. Citing one is without foundation.
- The Commonwealth of Pennsylvania's, "State Board of Crane Operators", membership is tainted with select personnel who continue to have position/relationship with cited "standard" organization. It is patently clear the "Board" does not approach the purity of "Caesar's Wife".
- Under the existing time restraint, suggest considering convening an ad hoc body of knowledgeable administrators and managers from the Crane Industry to review required accredited certification options. Rule making is best accomplished by administrators and managers. The judication that will follow is well done by technicians.
- Refrain from citing individual accredited certification providers unless "or" option is offered.
- Reorganization by a single accreditation provider is clearly focused and provides single executive responsibility, and the only requirement. Redundancy in this instance is not a safety net and may provide confusion to an otherwise clear process. Federal O.S.H.A., "The Law of the Land" requires a single accreditation. What is the circumstance in the Commonwealth that requires multiple accreditations?
- Cloning accredited certification providers will have a negative impact on the future competitive advantages and improvements needed to advance a strong viable certification process.

Thank you for the opportunity to comment and I stand ready to assist as may be fitting.

Very respectfully,



Paul S. Zorich
President/CEO



2850
From the Office of
Paul Zorich

Date: 7.6.10

Fx 717.787.0251

To: MR. CHRISTOPHER McNALLY, ESQ

No. of pages (including cover): 3

CHRIS: APPRECIATED "YOUR GATHERING"

THANK FOR THE INVITATION. PLEASE

POST TOPIC FOR IRRRC. IF I MAY BE

OF FUTURE AID; PLEASE CALL.

Paul

Call if any pages are missing or unreadable

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9:36am
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