



SkyAzul, Inc.
200 W Main St
Middletown, MD 21769
Phone 301 371-6126
Fax 301 371-0029
info@skyazul.com
www.skyazul.com

May 8th, 2014

Advisory Committee on Construction Safety and Health
OSHA Office of the Directorate of Construction
200 Constitution Avenue, Washington D.C.

To whom it may concern,

I am writing to comment on the proposed amendment to the Crane and Derricks standards regarding the use of proximity alarms.

My name is Brian Considine president of Skyazul Incorporated, Middletown MD. With a background in Civil Engineering, I have spent the past 25 years involved in the product management, sales, service and training of the electronic systems that assist operators in the safe use of mobile cranes.

At Skyazul we have been providing the system sales, installation and training in the use of power line proximity warning systems for the past 10 years. Specifically as a distributor of the Sigalarm brand. It is our experience that the Sigalarm system, when installed correctly and with operator training in the proper setup and use, greatly improves the jobsite safety level of Crane Lifting operations.

Many of our end users have evaluated the system as part of their own comprehensive safety program and confirmed this effectiveness. Recently one of our larger crane users completed a 5 year field evaluation of 25 installations on mobile cranes and reaffirmed their commitment to safe operations by implementing a proximity warning system as a requirement on their future crane purchases.

Given our confidence in the effectiveness of these devices but recognizing the situation that the Advisory Committee is looking to address, our recommendation is that the Advisory committee consider Alternative 2,

Alternative 2: OSHA could retain the reference to proximity alarms in §§1926.1407-1409, and add text to clarify that the proximity alarms would have to be NRTL approved. Therefore, if proximity alarms are approved by an NRTL at some point in the future, employers could use these devices to comply with the standard without further amendment to the regulatory text (this is the alternative discussed at the May 2013 ACCSH meeting).

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Considine", is written over a light blue circular stamp.

Brian Considine
President
Skyazul
200 West Main Street
Middletown, MD 21769
Phone 301 371-6126
Fax 301 371-0029
e-mail b.considine@skyazul.com