

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

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Website address www.dir.ca.gov/oshsb

Date: November 9, 2010

Dear: Advisory Committee Member

Subject: Proposed Amendments for Title 8, California Code of Regulations, Telecommunication Safety Orders (TSO) Section 8608(a) and (b), Fixed Ladder Rungs and Steps for Telecommunication Towers and Poles.

The purpose of this letter is to invite you to participate in an advisory committee to be convened by the Occupational Safety and Health Standards Board (Board) staff. The advisory committee will consider proposed amendments that are in part recommended in the Board's Petition File No. 510, submitted by Sabre Towers and Poles, a manufacturer of communication structures.

Federal OSHA telecommunication standards in 1910.268(h)(2) specify that fixed ladder rungs shall have a minimum clear width of 12 inches. The federal standard further states that fixed ladder rungs and step rungs for poles and towers shall have a minimum diameter of 5/8 inch. California's counterpart standards in TSO Section 8608(a) do not address the requirements for fixed ladders that are permanently attached to telecommunication towers. Those provisions for fixed ladders are covered in the General Industry Safety Orders, Section 3277(d), which requires fixed ladder rungs to have minimum diameter of 3/4 inch and a minimum clear length (width between the side rails) of 16 inches, and that ladder rungs shall be uniformly spaced not to exceed 12 inches between the top surfaces of rungs.

The committee will also discuss California's requirements stated in TSO Sections 8608(a) and (b) for permanent and detachable steps on poles in relation to similar provisions located in the federal standard and in California Public Utilities Commission (CPUC) General Order - 95¹.

The Petitioner's primary request is that California adopt standards consistent with the federal requirements for the diameter and spacing of rungs installed on fixed ladders attached to telecommunication towers. If you have access to fixed ladders on telecommunication towers, it would be helpful if you would confirm the width of those ladders, including the uniform vertical spacing between rungs from top surface to top surface and the diameter of ladder rungs.

¹ CPUC General Order 95 – 2009 edition can be accessed on the CPUC website at www.cpuc.ca.gov and searching for "General Order 95." The sections we will briefly review, which relate to stepping requirements on poles and towers, are Sections 51.7, 81.6, 84.7-E., 91.3, and 61.7.

The advisory committee will be held at the following time and location:

Wednesday, December 1, 2010, 9:00 a.m. – 4:30 p.m. (or until adjournment)
Division of Occupational Safety and Health
Training Room
2211 Park Towne Circle
Sacramento, CA 95825

Enclosed are the advisory committee roster, the agenda, the draft text proposal and the Petitioner's e-mail letter to the Board dated August 4, 2009. Also, please review the enclosed Board's Decision in Petition File No. 510 (dated January 21, 2010). The committee will focus on those items related to the proposed amendments, but in the course of discussions, may review safety policies and procedures used when climbing poles and fixed ladders on telecommunication towers.

Also, please be prepared to discuss the necessity of the recommended amendments and any costs or economic impact to employers or affected industries that may result from the proposed standards. If you cannot attend the meeting, please send an alternate, if possible, or submit your written comments by November 22, 2010 so that the committee can consider them.

Your assistance is appreciated, and we look forward to seeing you at the advisory committee meeting. If you have any questions or would like to discuss any items prior to the meeting, please contact me at (916) 274-5724, or at: ghauptman@dir.ca.gov.

Sincerely,

George Hauptman, Senior Engineer-Standards

Attachments:

Agenda

Advisory Committee Roster

The Petitioner's e-mail dated August 4, 2009 (Petition No. 510)

The Board's Decision dated January 21, 2010 regarding Petition File No. 510

Regulatory text (draft proposal)

cc: All Standards Board Members

Marley Hart, Executive Officer, OSHSB

Michael Manieri, Principal Engineer, OSHSB

Len Welsh, Chief, DOSH

Christopher Lee, Deputy Chief, DOSH

Joel Foss, Acting Principal Engineer, DOSH Research & Standards Unit

Van A. Howell, CSP, Area Director, Region IX, Federal OSHA

Kevin Thompson, Cal/OSHA Reporter