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OCCUPATIONAL SAFETY AND HEALTH  
STANDARDS BOARD

January 18, 2011

Occupational Safety and Health Standards Board  
2520 Venture Oaks Way, Suite 350  
Sacramento, CA 95833

RE: Petition to amend GISO 3276(e)(2) Inspection (Portable Ladders).  
Suggest changing the regularity at which the ladders are inspected from “frequently” to “at least monthly”.

Dear Sirs,

I would propose amending the newly enacted GISO 3276(e)(2) Portable Ladders – Inspection regularity from “frequently” to “at least monthly”.

In looking up the definition of “frequently” I find that GISO 3207 (a) lists the definition of “frequent” as:

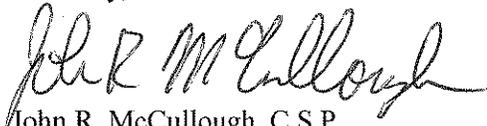
*Frequent. For the purpose of these orders frequent shall mean **more than twelve times each year unless specifically stated otherwise in individual orders.** <http://www.dir.ca.gov/Title8/3207.html>*

If “frequently” does indeed mean **more than twelve times per year** this regularity does not fit into many of the employer’s current inspection scheduling systems. Currently employers are inspecting items such as fire extinguishers and emergency eyewash units on a monthly basis per standards and this is a fairly easy for an employer to set up. Having ladders to be inspected “frequently” or at least 13 times per year does not fit a regular logical scheduling system.

Therefore I ask that the Standards Board amend GISO 3276(e)(2) – if indeed my reading of the definition of “frequently” is more than twelve times each year.

Thank you very much.

Sincerely,

  
John R. McCullough, C.S.P.  
Assistant Vice President

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