

June 15, 2018



Submitted electronically to:  
[rs@dir.ca.gov](mailto:rs@dir.ca.gov)

**SUBJECT: Heat Illness Prevention in Indoor Places of Employment  
Comments on Discussion Draft – May 16, 2018**

Thank you for the opportunity to comment on the proposed revised discussion draft for indoor heat illness prevention.

We would like to support the coalition comments submitted by the California Chamber of Commerce, but submit an alternative standard specific to equipment and vehicle cabs.

Specific to vehicles and drivers we would suggest replacing the language in the draft paragraph (3) with the following provisions:

***(3) Inside vehicles and equipment cabs.***

***a. Space inside vehicles without air conditioning expressly covered under 3395 (a) (2) (E) are considered outdoor work spaces and remain covered under 3395.***

***b. In accordance with section (a) (1) of this standard, vehicles and equipment cabs with air conditioning in which the temperature is below 85 degrees are indoor spaces to which this standard does not apply.***

***i. Worker may perform light or moderate tasks associated with pickup, delivery, safety, or interacting with customers or infrequent heavy tasks so long as there is unimpeded access to the air-conditioned cab at all times.***

We are happy to discuss the types of tasks drivers are typically expected to engage in as part of federally required safety regulations and routine business interactions with your staff in greater detail.

Thank You,

A handwritten signature in black ink, consisting of several overlapping loops and lines, appearing to be the initials 'CS'.

Chris Shimoda, Vice President of Government Affairs  
California Trucking Association  
(916)373-3504  
[cshimoda@caltrux.org](mailto:cshimoda@caltrux.org)