



December 17, 1999

OSHA Docket Office
Docket No. ICR-1218-0205 (2000)
Occupational Safety and Health Administration
U.S. Department of Labor
Room N-2625
200 Constitution Ave., N.W.,
Washington, DC 20210

The purpose of this letter is to provide comments to the Notice for Public Comment issued in the federal register, No. 64:57127-57128 on October 22, 1999 regarding the proposed extension of the information collection requirement of 29 CFR 1910.132 (d)(2) and (f)(4). This is a joint response which has been agreed upon by the National Telecommunications Safety Panel (NTSP), representing the major telecommunications companies in the United States (see attached list of represented companies). We collectively provide the following comments.

The telecommunications industry in general, and (NTSP) in particular appreciates OSHA soliciting comments concerning the proposed extension of the information collection requirements contained in the Personal Protective Equipment for General Industry Standard (PPE), 29 CFR 1910.132. We also appreciate the opportunity to provide comments and express an alternative that would minimize the burden on employers yet still ensure maximum protection of our employees.

Telecommunications companies have detailed, written operating practices and procedures for numerous work operations. These practices stipulate how work processes are to be done safely and efficiently and the material to be used, including PPE. Since a considerable amount of telecommunications work is done on customer premises, an assessment of every individual customer would not be practicable. Therefore, operating practices are written detailing general job requirements and potential hazards that could be encountered.

Company safety personnel continually analyze and evaluate particular types of work places, e.g., central offices, trenches, aerial and underground environments as well as potential hazards that may be encountered in the public environment. Based on these workplace evaluations:

- The typical hazards for each particular type of environment is recognized and evaluated.
- Appropriate safety precautions are established to protect employees from these hazards and are detailed in the written operating practice for working in that environment.

As for the written certification requirement, (d)(2), most telecommunications companies written operating practices are typically written, reviewed and authorized by company management. The manager, usually a Director level, that signs the practice as approved, is certifying that the evaluation of the particular job function was in fact completed, and all safety hazards were taken into account.

The requirement for certification of employee training, (f)(4), is, for the most part, a duplication of records and an additional burden to the employer because, generally, telecommunications companies maintain their training records using an automated system to document and maintain training records. The use of a mechanized system allows for the electronic submission and documentation of all types of training, including safety training. It also allows each company to maintain electronically, the training records of all it's employees thereby eliminating the need to maintain paper copies of completed training records.

Therefore, the telecommunications industry strongly recommends that OSHA allow companies to comply with (d)(2) and (F)(4) of 1910.132 by recognizing company written operating practice and procedure documents.

Again we appreciate the opportunity to comment and we hope OSHA looks favorably upon our recommendations that will greatly reduce the burden of certification of assessments and training of the PPE standard.

Questions regarding these comments may be directed to myself at:

Charles E. Hill, CHCM
Area Manager-Safety
Southwestern Bell Telephone
1010 Pine Street, Room 15-E-7
St. Louis, MO 63101

Sincerely,

Charles E. Hill
Chairman, National
Telecommunications Safety Panel

Attachment

CC: Members, National Telecommunications Safety Panel

Represented companies of the Telecommunications Safety Panel:

Ameritech

AT&T

Bell Atlantic

BellSouth

Cincinnati Bell Telephone

GTE

Lucent Technologies

MCI Worldcom

Pacific Bell

Southern New England Telecommunications

Southwestern Bell

Sprint Communications Company LP