

Daily digest of comments submitted for Jun 9, 2015

Affiliation Type	Count
Safety Mgr/Trainer	39
Tower Climber	5
Citizen	2
Total Comments	46

Question # 1

As a tower climber, what are the most significant hazards that you encounter on the job? What circumstances or conditions create or contribute to these hazards?

Comments for Question # 1

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University Safety Mgr/Trainer ID: 1069	Based upon recent analysis of fatalities associated with tower climbing, the number one cause of death is due to falls. 66% of falls are associated with improper use of fall protection equipment.
Jun 9, 2015 Anonymous Tower Climber ID: 1103	Alot of the older towers as the one I am currently working on. The safety climb is located on the inside so bigger guys such as myself are made to double click our safeties up the tower which makes your arms and forearm tired so more breaks etc so that is a hazard fatigue climbing your arms are needed though you won't/shouldn't fall to your death you will still fall into a safety in which you could be injured severely just one problem I know there are more
Jun 9, 2015 2nd gen Citizen ID: 1105	I've worked in this field and a lot does with structural. Work on old towers that should be replaced. Towers that have more than its load. We are told it's okay and climb. Money comes into play and that is the up most hazard in this field. Low bids to contractors; high revenue for providers.
Jun 9, 2015 Anonymous Safety Mgr/Trainer ID: 1108	At our company we are unaware of what practices are ethical in the event of a tornado or abrupt sever weather. We are implementing new practices but with being in remote areas we are trying to cover all scenarios. Major hazards also consist of working at heights. I read on forums and social media that many companies still require employees to purchase their own equipment.. The company has no idea what the equipment has gone through or if it has been through an impact. I know employers are responsible for providing ppe but more workers need to be made aware and have a place to go if they are having to furnish their own protective equipment. I also agree with our companies policy to train in house even if previous certs are held. There shouldn't be a cross over of certifications from company to company because it is never known what quality of training they really received. Employees really need a central location for their rights and stop relying so much on what employers may or may not say.
Jun 9, 2015 Dave Liles BL const Tower Climber ID: 1110	Working at night on a tower is stupid! You guys never show up unless someone dies! I've never seen OSHA on site.

<p>Jun 9, 2015 Vern Fitzgerald Tower Climber ID: 1111</p>	<p>Easily the most common hazards exist with the attitude of the climber/foreman/contractor. More than anything the safety climate dictated by the contractors and delivered by the foremen sets the tone for safety on a site. Individual climbers who are themselves reckless will never survive in a company that makes safety its number one priority. That said, the industry is inherently dangerous. Quite often climbers are asked to climb, and gladly do, in conditions that the average construction worker would decline. We are then asked to hang equipment from towers that were never built with the consideration of the construction process, only the finished product. For instance. The need to hang an antenna boom at the top of tower with no head room for rigging is an accident waiting to happen with anything less than a tower hand that is a master in rigging. It is impossible for a green hand to make those kind of calls, yet are often asked to do just that.</p>
<p>Jun 9, 2015 Bryan S. Various Different Corporations Safety Mgr/Trainer ID: 1112</p>	<p>One of the most common hazards I have encountered is maintenance window work or midnight shift work. This leads to working too many hours. EXHAUSTION seems to be a core of many problems. I would like to see some sort of regulation on "On the tower hours". Regulate it like the FMCSA DOT log books.</p>

Question # 2

What steps do you take, at this time, to complete your work safely? What safety-related work practices do you think should be in place?

Comments for Question # 2

<p>Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1070</p>	<p>Individuals without adequate training or experience should not be allowed to work on towers. Tower and rooftop owners should be held ultimately accountable for access to their facilities, and for the qualifications of workers on their sites. I would propose a certification card that workers would be required to have that indicates they have the training and qualifications to enter the site and perform work.</p>
<p>Jun 9, 2015 Anonymous Safety Mgr/Trainer ID: 1109</p>	<p>Documentation. It is policy to complete JSA before any work begins. We have hot weather and cold weather policies that have strict practices that must also be documented and photographed showing that proper gear is being utilized and at the ready. These items are shown in addition to the JSA and sent to ops managers for approval to work. If we are doing any type of rope access it is policy to photograph and pre plan all work and get it approved before starting.</p>
<p>Jun 9, 2015 Bryan S. Various Different Corporations Safety Mgr/Trainer ID: 1113</p>	<p>The JSA's offer a good start for everyone to be on the same page. When doctors and surgeons have a body open on the table, anyone can call a time out to re-evaluate and re-assess the situation. This is documented in the notes on such surgical procedures. We need to establish this sort of documentation and make time for these sorts of team huddles or re-groupings during the customers build.</p>

Question # 3

What safety rules and work practices are provided to you, and who provides you with that information?

Comments for Question # 3

<p>Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1071</p>	<p>This is a fairly unregulated industry with very little oversight or enforcement. Thus, the high accident and fatality rates.</p> <p>The FCC has only responded to 30 complaints of nonionizing radiation exposure in the past 12 years. Each one of those cases indicated that workers and the public were being overexposed to RF radiation, and resulted in penalties or forfeiture of license. That is 30 inspections, for approximately 250,000 sites.</p> <p>OSHA does very little comprehensive inspection and review of site safety and there are no specifically written regulations for tower climbers, other than the construction standards. OSHA tends to show up to sites and observe individual workers or crews, rather than look at the real problem of site access and control of work. This is a problem and represents a bottom up approach to tower safety, when a top down approach to safety management has been proven to be the most effective way to implement any safety program.</p>
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Jun 9, 2015 Anonymous Tower Climber ID: 1106	We have a set of in house safety rules we go by such as NO FREE CLIMBING every day we go over equipment in which we will be using and have safety meeting in the morning about concerns, plan of the day and best way to do the job when we have bad slings,equipment etc we cut the cord or sling up so not to accidentally use it report it to the office some stuff we turn in the bad to be fixed (power tools) , slings we turn in and are issued new
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Question # 4

Who assigns and oversees your work? Who provides your training and checks your equipment? When at a jobsite, to whom would you report a potential safety issue?

Comments for Question # 4

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1072	The best tower work companies have excellent safety programs, training, supervision, and records. Other companies have little to no written programs, training or experience. Unfortunately these smaller companies compete for business with the good companies, and can often under bid jobs. Since no one holds the site owner responsible if a worker dies on their tower, the conditions persist.
Jun 9, 2015 Anonymous Tower Climber ID: 1104	Safety concerns first go to the foreman now some foreman the one year foreman wouldn't be able to answer these questions I try to make sure it's not something we can solve first but in some cases it is bigger than me so I call my project manager and our in house safety guy and we go over options to fix the problem and contact the customer on all issues we come up with tower owner when it is a structure issue

Question # 5

What specific steps do you think employers can take to make tower work safer?

Comments for Question # 5

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1073	The other 34 % of fatalities on towers are due to structural failure, equipment failure, faulty design, and electrocution. Most of these issues are associated with the tower owner/operator and are out of control of the worker. There are no specific regulations or oversight of much of the tower operations, including maintenance. As towers age, and additional antennae are added, they become more hazardous. Often, workers and tower climbing companies are hesitant to report structural problems for fear of losing the work. There is no federal agency to report unsafe structural conditions to, and expect a timely response. OSHA inspectors are not trained in tower structure safety, and it can be difficult to resolve issues without specific regulations. Tower construction and maintenance guidelines focus primarily on keeping the structure standing, but not the safety of tower workers.
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Question # 6

How, and to what extent, does the design or configuration of towers, and equipment installed on towers, affect your ability to complete your work safely?

Comments for Question # 6

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1074	Towers are designed and built to hold antennae. They are not designed for the safe habitation of workers. There are few requirements for adequate climbing systems, platforms to work from, tie off points, or safe climb systems. To the contrary, the towers themselves result in configurations that themselves become the hazards. Tower systems that are safe for worker occupancy exist. The technologies are available and are used consistently in other countries effectively.
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Question # 7

Tower hands/climbers, please describe the training and certification required for your job. Employers, please describe the types of training and certification you require for your employees.

Comments for Question # 7

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1075	Training and certification are not required at this time. Workers climb towers with little or no training and there is no requirement in this area.
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Question # 8

What commercial training programs are currently available? What are the topics covered by the programs? Are the programs adequate to prepare employees to work safely on communication towers?

Comments for Question # 8

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1076	Some comercial training programs, including certification, are available and are consistently used by the best companies. These programs could be the basis for a regulated system of training, testing, and experience certification.
Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1095	There are many quality training programs; the key is that training must be continuous . Providing a training once and not building upon the initial training isn't effective. Employers must provide training on a regular basis and encourage employees to actively utilize their training building a culture of safety. One time training isn't working.

Question # 9

Is there a need for a standardized, industry-wide training or certification program?

Comments for Question # 9

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1077	Yes
Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1096	Standardization has its benefits however just because someone is trained and holds a certification doesn't mean they are competent to do the job safely.
Jun 9, 2015 Bryan Steiber, CHST Various Different Corporations Safety Mgr/Trainer ID: 1114	Yes.

Question # 10

From your perspective given your role in the contracting chain, what does a tower climber need to know to do his or her job safely?

Comments for Question # 10

Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1097	Basic hazard recognition and antenna identification are critical. Hazard recognition is often missing as technology changes and so does the continual makeup of the workforce. Being able to recognize the hazard is the first step in ensuring safety. There are so many hazards on telecom sites including falls, RF, heat, cold, animal encounters (snakes, mice, birds, and spiders), unsafe structures, trips, electrical, and so on. Antenna identification is lacking, and if techs can't ID the antenna it's impossible to mitigate the hazard. Also basic hazard Identification such as some listed above. Is the snake or spider poisonous....and such things like this. Understanding of ALL hazards is the only way to work towards safe worksites.
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Question # 11

How do employers evaluate employees to ensure that they have been adequately trained, especially when employees receive their training or certification elsewhere? How do companies determine if employees are proficient in the topics covered by the training or if re-training is necessary? Do employers offer site-specific training that addresses specific types of towers and equipment?

Comments for Question # 11

Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1098	Auditing is critical. Someone knowledgeable about safety must perform these. Also companies should work together to audit each other to see what they might be missing which could be hazardous. It's like a hole in my yard. I know it's there, I step over it and walk around it but if someone comes to my door and it's dark they might not see it whereby causing them to step in it and sprain their ankle. I knew it was a hazard; but I worked around it as opposed to filling it in. By having others periodically visit sites and go through the JSA, a new perspective could be gained and hazards uncovered that you just worked around because you were fully aware of them. There must be a competent person on site to STOP the work when retraining is necessary to ensure safety.
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Question # 12

For employers who contract out work (e. g., carriers, turfing vendors), what contract language or oversight mechanisms do you use to ensure that work is done by trained and/or certified workers?

Comments for Question # 12

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1078	Unfortunately here, the wording is often created with the interest of relieving the tower owner or antennae operator of statutory duty. This leaves the responsibility with the tower climber, which again, leads to a bottom up approach to safety. If there were adequate regulations in this area, it would not be possible to delegate the management of tower safety to the workers. The tower owners and operators would maintain accountability. This approach would greatly improve site safety overall.
Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1079	Having a certification process would be a good start. Workers could be subject to losing their certification card if the conduct work in an unsafe manner. As it is at the moment, workers found to be working in an unsafe manner may be fired, but they just walk down the street to the next tower company and get a new job. There are no controls in place to prevent this at this time.
Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1099	OSHA standards are a minimum! Everyone is technically required to meet these standards just to do the work. I know, not all companies even meet minimum requirements; but by having requirements for contractors to exceed standards (ie NATE Star) and have a continuous improvement plan in place, should be a priority. Contracting with organizations that exceed the standards is what best in class companies strive for.

Question # 13

Are employees directly engaged in tower work assessed for physical fitness? If so, how? Are physical fitness requirements and assessments addressed in contracting agreements?

Comments for Question # 13

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1080	Tower owners and operators have little input into this area. Even the better tower worker contractors have little control over the fitness of their workers.
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Question # 14

What physical limitations should employers be aware of when assigning an employee communication tower work? What hazards might be associated with such limitations, and how could those hazards be mitigated?

Comments for Question # 14

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1081	It might be beneficial to assess workers for physical ability to climb the towers, but this would become evident very quickly during active training sessions climbing towers. Circulatory, respiratory, or cardiovascular illnesses may preclude employment in this area and medical evaluation prior to employment may be warranted. Workers should be acclimatized to thermal work conditions, when necessary.
Jun 9, 2015 2nd gen Citizen ID: 1107	RTC (rotator cuff tears) should be a concern. Tears cause numbness that can affect grasping motions. Back injuries. You can still climb yes, but is a brace being used to help prevent to core from being over used and easing the stress. But the biggest is fatigue. How many hours did someone drive. If over a certain amount they shouldn't be on the tower. Yes driving causes fatigue. Does someone have apnea. Sleep apnea interrupt a good night sleep.

Question # 15

Falls: Falls are currently the leading cause of fatalities among communication tower workers. OSHA believes that many falls result from the improper use of fall protection equipment or the failure to use any fall protection equipment at all.

- How are employers addressing fall hazards?
- Are employers providing appropriate fall protection equipment to employees? Is it maintained and replaced when necessary?
- What factors contribute to employees failing to use fall protection while climbing or working?
- Are there situations in which conventional fall protection (safety nets or personal fall arrest systems) is infeasible? What alternatives can employees use for fall protection in those situations?
- What are the ways in which fall protection systems or anchorage points on communication towers can fail? How can these failures be prevented?
- Should OSHA require built-in fall protection measures on new towers? Existing towers? Would such a requirement enhance worker safety?

Comments for Question # 15

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1082	Unfortunately the OSHA investigation reports over the past 12 years are not accurate or detailed enough to adequately answer these questions. Based upon my observations and interviews of workers in this field here are the responses to the questions overall; a. Most workers use some form of fall protection and the tie offs available on towers. b. Some workers use good fall protection equipment appropriately, others do not. c. In some cases, workers forget to tie off. In other cases, there are not adequate tie off points. Towers are not required to have adequate tie off points or climbing systems. This leads to workers taking short cuts. d. When the tower geometry is too difficult to use normal tie off points, workers will install additional tie off lines. These work fairly well but can be time consuming to install properly. e. Tie off points often fail for structural reasons. They are rusted or bolts are missing. There are no regulations for tower maintenance. It is up to tower owners to maintain the towers, and there is no incentive to maintain them for worker safety. f. Of course OSHA should begin a regulatory and enforcement policy for tower design and maintenance. With around 250,000 towers already built and in place, it is a difficult question to say how they will have much impact on the industry that has been in existence since around 1985. At least new towers could be built with worker safety in mind.
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Question # 16

Structural issues: When new equipment is added to communication towers, the additional loading of the tower has the potential to overload or destabilize the structure. Older towers may need additional reinforcements to maintain their structural integrity as new equipment is added to them. Communication tower collapses have resulted in numerous fatalities in the past two years. Which contractual party bears responsibility for ensuring that any structural work on the tower—such as modification or demolition—is done safely from a structural perspective? What steps are employers currently taking to prevent collapses?

Comments for Question # 16

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1083	I brought this issue up with tower owners and they said that any new installations of equipment are analyzed for impact on tower structure integrity. That said, this is obviously not the case for all towers. Although there are standards for tower design and construction, it is not clear who oversees or regulates the towers once they are built? I believe that tower owners should be ultimately responsible for the integrity of the tower. Any one antennae company/operator cannot ensure, or be responsible for the maintenance of the tower, to the extent that it will not collapse when a new antenna is added. And workers or contractors cannot be held responsible for knowing if the new antenna they are hired to install will topple the tower. In lieu of regulations in this area, tower safety in this area may be addressed through lawsuits and the legal system. Penalties would be such that a tower owner would pretty much go out of business for good, if the collapse results in a fatality. This is how it is done in other countries with many fewer worker fatalities due to tower collapse and faulty structures.
Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1100	Structural analysis signed by a PE licensed in that state should be a minimum. With this being said, the engineer will not know if the tower is corroded, incorrectly installed, or has other safety issues. I believe mandating some type of routine physical inspection of all structures that will be climbed upon is necessary as anything can cause a structural failure from wind, overloading, composition of soil, and so on. Without an onsite physical inspection no one would know this. Another idea is to have workers notify the structure owner of issues they see while on site. The owner would then report the fix to the worker's employer. If it's not fixed there must be some type of penalty for knowingly leaving a dangerous structure. Example: child abuse. School teachers are required to report when they encounter abused children. Something like this could be implemented in the telecom sector so the person reporting the incident doesn't feel in fear of repercussion.

Question # 18

Radio Frequency Hazards: Much research has been done on the health effects of overexposure to radio frequencies. General health effects reviews have found that high levels of exposure to radio frequencies may result in burns. In addition, the link between exposure to radio frequencies and cancer, reproductive diseases, and

neurological effects has not been thoroughly explored.

- a. What methods are employers using to protect workers from overexposure to radio frequency?
- b. Is there a need for employers to institute comprehensive radio frequency monitoring programs on communication tower worksites? What would a good program look like?

Comments for Question # 18

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1084	<p>a. Tower climbers can use alarming RF dosimetry to warn workers of RF hazards. Unfortunately, tower owners and antennae operators have not been effectively held accountable for RF safety at their sites.</p> <p>b. Due to a system of shared responsibilities, RF exposures have not been controlled effectively and workers and the public are routinely overexposed to hazardous levels. When I recently told a client that their rooftop RF levels were 150% of MPE they asked what the likelihood that they would ever be inspected or receive a monetary fine? Since my response was, "probably never", they decided not to take any action to reduce levels or post the area as an RF hazard. Without enforcement of regulations, this is the pervasive approach to site safety in the U.S. Not only are workers being over exposed routinely, but other rooftop workers, considered the general public, such as air conditioning workers or roofers, are routinely overexposed.</p>
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Question # 19

Weather: Communication tower workers work outside during all seasons, and in all climates. They can be exposed to heat, cold, wind, snow, and ice. Storm conditions can quickly arise when workers are at elevation, and it can be difficult to descend the tower quickly.

- a. What are the specific weather-related hazards to which communication tower workers are exposed?
- b. How does a crew monitor and respond to changing weather conditions, including storms?

Comments for Question # 19

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1085	<p>Tower workers may receive some training on thermal hazards of heat and cold work environments, but this is not universal. Tower workers work in all types of weather, and for extended periods. Once they climb the tower, they stay up there for up to 12 hours in the cold, heat, rain, and snow.</p> <p>Some of the good training programs have addressed appropriate activities for judging and responding to weather conditions. It is unlikely that tower crews have access to thermal assessments using accepted industrial hygiene tools, and comparison to OSHA or ACGIH guidelines.</p>
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Question # 20

Fatigue: OSHA believes that fatigue can affect communication tower workers in several ways. Climbing a communication tower is physically demanding, and OSHA is concerned that fatigue due to exertion can be hazardous for tower workers. Accelerated work timelines can also result in tower workers working very long hours. And OSHA understands that communication tower workers may travel long distances to reach remote worksites, which can result in workers being fatigued before they even begin work.

- a. What hazards are faced by a worker who finds it physically challenging to perform expected tasks, such as climbing a tower or performing a self-rescue? What impact can this have on other crew members?
- b. What are the common causes of worker fatigue at communication tower worksites?
- c. What are the effects of fatigue on tower worker safety, and what types of incidents occur as a result of worker fatigue?

Comments for Question # 20

Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1101	Physical requirements must be required for job performance. Any type of injury, sickness or impairment (ie a late night drinking) can have life threatening repercussions. Heat, RF, physical exertion, illness, and 12-16 hour work days. It is proven fatigue increases the likelihood for accidents. Fatigue impairs mental processing and decision making abilities,
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Question # 21

Other common hazards:

- What other hazards are present in communication tower work, and what types of incidents are resulting from those hazards? What can be done to protect employees from those hazards?
- What are some health and safety considerations involved in working with communications equipment installed on non-dedicated tower structures, such as water towers, buildings, silos, electrical transmission towers, etc.?

Comments for Question # 21

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1086	UV radiation is a known probable carcinogen as defined by the International Agency for Research on Cancer (IARC). Some workers are aware of this hazard and take appropriate protective actions such as the use of long sleeves and pants, the use of sunscreen, and UV protective eyewear. It is not certain what percentage of workers are aware of the hazards or take appropriate protective measures.
Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1087	Workers may be exposed to excessive levels of noise due to wind or weather conditions. Live hazards include insects, birds, bird nests and droppings, rodents, snakes, farm animals, and bears. In recent months tower climbers have been accosted by drones in the workspaces.
Jun 9, 2015 Miranda Allen RSI Safety Mgr/Trainer ID: 1102	bugs, snakes, rodents, falls, ladders, dropped objects, RF, confined spaces, heat, cold.....Education on the existence, aware of what to do if the hazard is there and the ability to take the necessary actions to mitigate the hazard affects. Electrical, drowning, dust.....

Question # 31

Can towers be designed and built with elevators for lifting personnel or materials? Can towers be built with booms or davits aloft to aid in hoisting materials?

Comments for Question # 31

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1088	Tower structures in France tend to be large concrete structures with stairs or ladders built on the inside. Once on top of the tower, the workers work on level platforms with fall protection barriers fixed in place. These towers tend to be more stable and the workers are at minimal risk of falling.
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Question # 33

What are the industry standards for providing fall protection anchor points on new towers?

Comments for Question # 33

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1089	There are no standards for fall protection anchor points on new towers. Why is OSHA asking this question?
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Question # 34

What would be the advantages and disadvantages of an OSHA standard that covers both construction and maintenance activities on communication towers?

Comments for Question # 34

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1090	The requirements should not be focused on maintenance activities per se. That is again placing responsibility on the workers or contractors, rather than the tower owners. Owners need to be responsible for having a safe tower. The statutory responsibility needs to be at the highest level, the owners, not the contractors.
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Question # 35

What effects have the North Carolina and Michigan regulatory approaches had on work practices and climber safety in those states?

Comments for Question # 35

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1091	State regulations are a good beginning. If all 50 states had them we wouldn't need OSHA. State regulation is a good alternative to strong federal oversight.
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Question # 36

Should an OSHA standard be limited to work performed on communication towers, or should it also cover towers used for other purposes?

Comments for Question # 36

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1092	OSHA should not focus on the work or workers, per se. Tower owners need to ensure that workers on their sites are certified and experienced. Siting individual workers for not following a rule is not going to address the comprehensive problem of responsibility for structure safety or site access. Again, this is a bottom up approach to safety management. This is not the way we run safety programs in other industries. We begin by developing policies and programs at the highest levels of management, and then work our way down to ensure they are implemented by supervisors and workers. Why should OSHA begin with enforcement at the lowest levels of the work chain in the case of tower safety? Just like any other industry, it is not a worker issue, it is a management issue. If management is not held responsible, that is tower owners and antennae operators, why should workers be subject to more stringent enforcement. This approach is unethical.
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Question # 37

If OSHA does not initiate a dedicated rulemaking for work on communication towers, what other types of

regulatory actions might be necessary and appropriate?

Comments for Question # 37

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1093	In lieu of new regulations, there should be increased judicial oversight and action taken in the courts by workers, possibly banding together, to press charges of negligence against tower owners and operators when workers die, if not for worker actions themselves, at least in the cases of structure collapse or equipment failure. High visibility cases in court can work to move the owners/operators to taking more protective and proactive stances on tower maintenance and operation. Enforcement in this area has proven to be ineffective or nonexistent. Legal action with large monetary penalties could go a long way in getting the attention of owners and operators to implement management programs and site control over contractors.
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Question # 38

What non-regulatory approaches could OSHA take to address hazards faced by employees working on communication towers?

Comments for Question # 38

Jun 9, 2015 Dr. Thomas P. Fuller Illinois State University - Safety Program Safety Mgr/Trainer ID: 1094	As industry standards for safe tower operation become more accepted, legal action for ineffective programs that result in fatalities and injuries could influence tower owners and operators to manage their sites more safely. Expert witnesses could testify to how a tower or rooftop should be operated by industry standards, and when the jury sees how the rooftop owner ignored the basic safety guideline, or in some cases RF exposure limits, large monetary awards could move other tower or rooftop owners to take appropriate safety actions. It is too bad a regulatory system or body could not be designed to be effective at ensuing worker safety, and we need to resort to the popular American approach of lawsuits for negligence. This approach does not ensure that everyone is safe, only that some of the injured are awarded damages. In the long run, however, it could lead to better safety overall.
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