

**BEFORE THE
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
WASHINGTON, D.C.**

**DOCKET NO. OSHA-2015-0012: CRANES AND DERRICKS IN
CONSTRUCTION: EXPANSION OF RAILWAY WORK EXEMPTIONS**

**COMMENTS OF THE AMERICAN SHORT LINE AND REGIONAL
RAILROAD ASSOCIATION**

September 17, 2018

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The American Short Line and Regional Railroad Association (ASLRRA) on behalf of itself and its member railroads, submits the following comments in response to the Proposed Rule published by the Occupational Safety and Health Administration (OSHA), soliciting public comment concerning exemptions for certain railroad “roadway maintenance machines” from the requirements of the 2010 Cranes and Derricks in Construction standard.¹

Comments

The ASLRRA agrees with the comments submitted by the Association of American Railroads (AAR) on September 14, 2018. We

¹ ASLRRA is a non-profit trade association representing the interests of approximately 450 short line and regional railroad members and railroad supply company members in legislative and regulatory matters. Short lines operate 50,000 miles of track in 49 states, touching in origination or termination one out of every four cars moving on the national railroad system, servicing customers who otherwise would be cut off from the national rail network.

would like to emphasize that we agree with their statements: “that it is still appropriate to include an explicit exemption for roadway maintenance machines in the OSHA Crane Standard” and that “certain railroads (or their contractors) may not be familiar with the preemptive exemption for roadway maintenance machines in the OSHA Crane Standard.”

ASLRRA’s small business members urge OSHA to consider provisions included in the Small Business Regulatory Enforcement Fairness Act of 1996 when drafting the final rule. Specifically, to produce small entity compliance guides and to be responsive to small business inquiries about compliance with the agency’s regulations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jo Strang". The signature is fluid and cursive, with a large initial "J" and "S".

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