



# International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

August 12, 2022

## SENT VIA EMAIL

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GENERAL PRESIDENT

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Wage and Hour Division- S-3502  
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Dear Acting Administrator Looman,

Please accept the below as the International Union's Operating Engineers comments on the below referenced proposed regulation.

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## International Union of Operating Engineers Comments on:

### **“Report of Construction Contractor's Wage Rates”**

Control Number: 1235-0015

87 FR 36152

Pages: 36152-36153

The International Union of Operating Engineers (“IUOE”) respectfully submits this comment on the Department of Labor-Wage and Hour Division’s (“WHD” or “USDOL”) solicitation of comments concerning proposed revisions on the Report of Construction Contractor’s Wage Rates (“WD-10 Form” or “WD-10”) published on June 15<sup>th</sup>, 2022.

The IUOE was founded in 1896 and proudly represents over 400,000 working people across the United States and Canada. Members of the IUOE are primarily operating engineers, who work as power equipment and crane operators, pipeliners, mechanics, and surveyors in the construction industry, and stationary engineers, who work in operations and maintenance in building and industrial complexes, as well as several job classifications in the petrochemical industry. While working and advocating on behalf of our members, the IUOE is intimately familiar on all matters surrounding the Davis Bacon Act (“DBA”, “The Act”, or “Davis Bacon”) since it was passed into law. By and through our 72 Hoisting and Portable Locals throughout

the United States and Canada, the IUOE maintains and administers hundreds of Collective Bargaining Agreements throughout all 50 states, and consequently, it has first-hand knowledge and expertise of the heavy construction equipment needed to build America.

### **Introduction**

The IUOE understands the vital role the WD-10 form plays in administering the Davis Bacon Act. The form is the basis for the submission and measuring of construction wage data which is then analyzed to create Prevailing Wage Determinations that apply to federal construction projects across the country. Because of its importance, the WD-10 must be treated extremely carefully as it directly impacts the real wages of millions of working families across the country.

It is well established that the current Davis Bacon survey and data analyzation processes are unacceptably lengthy, inadequate and vex nearly all DBA stakeholders. The WHD took many steps to correct these problems in their previous “**Updating the Davis-Bacon and Related Acts**” proposed regulations earlier this Spring. As stakeholders await that final rule, the IUOE is pleased that this is another serious step taken by the WHD to streamline these processes.

Many of the proposed changes to the WD-10 are common sense reforms that the IUOE wholeheartedly supports. Davis Bacon Surveys, to the detriment of Wage Determinations, are plagued by a lack of participation which creates an inaccurate picture of which wages truly prevail. The elimination of the Peak Week, Project Value and Contractor/Subcontractor data inputs will make the WD-10 form more accessible, less confusing, and less burdensome for all stakeholders. Those data points are easily ascertainable via other methods and their elimination brings the WD-10 form squarely to the wage measuring role it’s best suited and intended to play. Further, the IUOE applauds the creation of the WD-10a form which will help target and increase outreach to stakeholders affected by new Surveys.

With that said, the most consequential aspect of these proposed changes involves the creation of the new classification picklist. The IUOE tentatively supports the creation of this picklist but has concerns and suggestions that we hope can respectively be addressed and adopted by the WHD in their final rule. The IUOE believes the WHD must take proactive steps to ensure that the equipment on the classification pick list is contemplated in a manner that accounts for the disparities in the size, function, and sophistication of certain pieces of power equipment.

Measuring wage data for Power Equipment Operators currently presents a daunting task, primarily because of the sheer numbers of equipment operated on construction projects across the country. The IUOE maintains and promotes a policy of Local Union autonomy but understands that this autonomy can lead to many different names and designations being captured and published for equipment in Davis Bacon Wage Determinations. This lack of uniformity for power equipment across Surveys is exacerbated when you consider the ad-hoc equipment scheme (or lack thereof) that open shop contractors maintain. Accordingly, IUOE members and non-union equipment operators, alike, can suffer from this during Wage Surveys,

especially given how rigid the process has come in the wake of the 1981 reforms and Mistick Decision<sup>1</sup>.

Consider, that under the current framework, a situation where a Local CBA enumerates the commonly known Excavator simply as an “Excavator”, and a busy signatory contractor filling out WD-10 forms instead mistakenly inputs that Excavator instead as a “Power Shovel”. That contractor submission will be differentiated and treated as a distinct piece of equipment and in turn dilute the Local’s other submissions that were properly enumerated with an “Excavator” title. This type of common error is a lose-lose for workers, contractors and the WHD in trying to publish what is the true prevailing wage on pieces of equipment and lowers wages across the country. For those reasons we understand and support a picklist of commonly used pieces of equipment to simplify the submission of wages.

While what the WHD promulgated in its initial equipment picklist is a start, the IUOE believes that list must be re-assessed and transformed to better reflect more commonly utilized power equipment on Davis Bacon projects. The following are the changes the IUOE proposes the WHD make on the picklist will meet the goal of streamlining the input of power equipment on the WD-10 while still accurately presenting a clear picture of equipment utilized. The IUOE advocates that the WHD:

- Make common sense additions, consolidations, and subtractions to the equipment picklist that will increase the number of Power Equipment Operator inputs by 13 to reflect 51 selection options from the original 38 the WHD proposed. These changes best reflect commonly used pieces of equipment across all sectors of construction and will be discussed and justified and then incorporated into Addendum A at the end of the document which the IUOE implores the WHD to adopt as its equipment picklist.
- Create optional common sub-designations and identifiers inputs for 13 pieces of the above referenced equipment that will better differentiate and measure that equipment accurately to reflect pay disparities across the industry. Those changes will be discussed and justified and incorporated into Addendum A.
- Analyze and adopt Addendum A (attached herein) as the Power Equipment picklist WHD on the new WD-10 form. Addendum A adopts the changes in this comment and will help the WD-10 measure power equipment more efficiently, but more importantly accurately.

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<sup>1</sup> Mistick has severely damaged the way WHD measures power equipment. The Case takes away the Administrators discretion to make common sense determinations in publishing Survey Data. Without this discretion and by taking an individualized equipment approach this has led to new WDs not publishing equipment rates in some instances and power equipment wages too reliant on the Conformance Process. Without data to publish wages and no longer the discretion to adopt CBA groups, Power Equipment Operators across the country continue to suffer. *See, In the Matter of: Mistick Construction and Associated Builders and Contractors of Western Pennsylvania, Inc. With Respect To Review and Reconsideration of Davis-bacon Wage Det. Nos. Pa 020013, Pa 20030033, Pa 030013.* ARB CASE NO. 04-051 (2006) Available at: [https://www.oalj.dol.gov/PUBLIC/ARB/DECISIONS/ARB\\_DECISIONS/DBA/04\\_051.DBAP.PDF?\\_ga=2.186938720.999134824.1652725844-1065806743.1610120323](https://www.oalj.dol.gov/PUBLIC/ARB/DECISIONS/ARB_DECISIONS/DBA/04_051.DBAP.PDF?_ga=2.186938720.999134824.1652725844-1065806743.1610120323).

## **Additions, Consolidations and Subtractions to Equipment Pick List**

The IUOE, through its long history of representing hundreds of thousands of equipment operators across the country, possesses extensive knowledge on which power equipment are used commonly across the United States. While the WHD's initial list was a good start the IUOE proposes the following changes to the equipment picklist.

### **Additions**

The IUOE proposes and has added the following pieces of equipment to the Equipment picklist as seen in Addendum A.

*Autonomous Power Equipment-* As with many modes of power and transportation, automation of construction equipment is likely to play an increased role in the future. While there is a long road ahead, the WHD should add this equipment in anticipation of where the industry will be moving towards over the next few years and in the coming decades. The IUOE has partnered with numerous autonomous startups and it's clear this equipment will need specially trained Operators as this technology slowly gets off the ground. Current equipment utilized in the industry that stakeholders should have the ability to input include hydro-demolition machines and automated dozers.

*Assembly/Disassembly Engineer-* This person is responsible for the assembly, disassembly and safety of all Power Equipment utilized on projects. This job is vital in the modern era of crane safety that present owners and contractors rigorous safety standards to ensure the general public remains safe around construction projects. The Assembly Engineer directs and inspects a crew of other Operating Engineers to ensure a crane is put up efficiently and safely, this title is often contemplated by parties to receive a wage differential and the WHD should take this position into account.

*Off Road Articulating End Dumps-* Articulating End Dumps are equipment utilized to move substantial material on or around the rough terrain of construction sites.

*Boat/Barge Operator-* Vital personnel, material, and safety tool for construction in water environments. IUOE members operate these across the country when the job calls for them.

*Breaker (Remote or Seated)-* Breakers are vital in projects where concrete, rock and other material must be broken and demolished to complete the project. This equipment is especially vital on projects where jackhammers are too small to complete the work and dynamite blasting is not an option. This equipment can perform rubblization of concrete pavements prior to overlaying with asphalt or concrete to produce a structurally sound base and can perform full lane-width rubblization in a single pass.

*Concrete Cutters/Saw-* This type of specialty equipment is used to cut concrete on utility work and patch installation in a quick and compact manner. Concrete Cutters are vital and seen across projects which involve lane closures or projects which have sensitive timelines such as airports.

*Concrete Pump*- Previously the WHD listed the vague and confusing “Concrete” classification. The IUOE believes this classification should be clarified and believe the numerous Concrete classifications we separated them into, including this Concrete Pump classification, better encapsulates concrete power equipment operation. Concrete Pumps are unique but vital equipment used across construction sites. This equipment typically operates using a robotic articulating boom to place concrete accurately and quickly. This piece of equipment is synonymous with construction projects and should be singled out.

*Drone*- As with autonomous equipment, the construction industry has continued to embrace new technology. Drones have come to play an important role in inspecting and repairing power equipment and surveying construction sites. The IUOE has embraced this technology and its members operate drones on construction sites across the country in conjunction with our mission to maintain equipment and survey jobsites.

*Gradall*- Gradall is a truck and excavator combination piece with a telescopic boom that is commonly used on highway projects where maneuvering traditional type of digging equipment is difficult. Because of the uniqueness of the equipment and its vital role in a large sector of Davis Bacon projects the IUOE believes it’s appropriate to receive a separate classification.

*Helicopter*- Similar to the boat classification, this type of equipment is vital when the jobsite calls for it and should be accounted for by the WHD especially in more rural and remote areas of the country.

*Hoist/Elevators*- Hoists and elevators play a vital role in the construction industry, especially for mining/tunnel operations and building projects. Hoists and Elevator Operators are responsible for transporting the entire workforce to their place of work and get materials where needed, their operation is vital to construction sites.

*Horizontal Directional Drill Equipment*- Horizontal Direction Drills (“HDDs”) allow for the excavation and installation of conduit, pipe, and cables in areas where traditional construction practices are not feasible or too disruptive. This equipment has played a vital role in renewing America’s infrastructure grid and as that process continues to take place over in the future this equipment will continue to be increasingly utilized.

*Material Testers*- This job title provides environmental testing before a project begins. As work progresses, Testers perform evaluations of moisture content, density, stress response, and chemical makeup. This work includes field inspection of cured and uncured concrete, asphalt, welds, structural steel, fireproofing, masonry, soil, facade, reinforcing steel, formwork, and other construction materials.

*Material Transfer Device/Buggies* - Equipment used to transport hot-mix asphalt, concrete, and other materials to and from multiple operations across the project.

*Maintenance Engineer/ Oiler*- Adding Maintenance Engineer to the Oiler classification better reflects the current realities of the industry. While oiler is still a well frequented term, Maintenance Engineer better encapsulates the role of this classification as equipment has

continued to evolve with technology. For example, these roles still incorporate oiling, greasing, and other traditional equipment maintenance but these jobs now also involve the additional maintenance of new complex technology factors such as exhaust scrubbers and increasingly environmentally friendly fluids.

*Onsite Plants and Pump Operations-* The IUOE adds this classification as it's an important aspect to construction sites that should not be overlooked. Construction sites often present unique challenges that can make it difficult to bring typical outside suppliers and instead contractors are forced to create, provide, or remove various materials. As will be discussed further, the IUOE believes this classification should have the following sub-classifications: Concrete/ Redi-mix, Asphalt, Freeze, Grout, Aggregate, Well Points/ Filtration systems and Crusher Plants which encapsulate the work these operations typically do across job sites.

*Small Equipment-* The IUOE adds this classification with various subcategories, as discussed below. This smaller equipment which typically involve Operating Engineers maintaining and operating multiple pieces of these types of equipment. This equipment while individually small, collectively play a vital role in the progress of the job. The small equipment sub-categories incorporate the following: Light Towers, Compressors, Generators, Heaters and Ground Heaters.

*Vacuum /Hydro excavator-* The IUOE adds this technology in recognition of how ubiquitous this piece of equipment has become across construction sites the last few decades. This equipment uses suction to carefully excavate slurry, liquid, or dirt in delicate areas where a bucket is not feasible. With the level of popularity this equipment has gained across the industry, the WHD must take this classification into account.

*Soil Stabilizer/ Tiller-* This piece of equipment is used to blend and mix dirt with various treatments to prepare it to be a stronger foundation.

*Specialty Bridge and Highway Equipment-* Many types of sophisticated and specialized pieces of power equipment are utilized solely on highway and bridge projects where working conditions and logistics present more of an operational challenge. Many pieces of equipment used in this work are atypical, however, their importance to the projects they are on should be acknowledged and accounted for separately by the WHD. Stakeholders should have the opportunity to manually enter the specific piece of equipment being referenced. Examples of this equipment include: Traffic Barrier Transfer Machines, Dowel Machines and Bridge Deck Groovers.

*Surveyor-* The IUOE represents thousands of Construction Site Surveyors and led the charge for years to ensure they finally and justifiably receive coverage under the Act in 2013. Surveyors work hand in hand with their fellow Operating Engineers on all aspects of work and directly related to grading and equipment maneuvering operations.

*Tele belt/ Conveyor Belts-* Tele-belt and other material Conveyor Belt type equipment is vital when material cannot be excavated and placed with typical construction type equipment and/or buckets. This equipment typically plays an important role in tunnel and foundation work where material must be moved continuously and quickly and should be measured as common equipment by the WD-10.

*Trucking of Power Equipment/Low Boys*- IUOE members across the country are responsible for the safe and efficient transport of the power equipment they operate and maintain. For many reasons, pieces of power equipment cannot be driven across the site as is and must be transported on a lowboy or some other type of truck. The WHD should incorporate this classification for this type of scenario which involves the driving of a truck for this specific purpose.

*Welder*- IUOE proposes adding welders as IUOE members weld in conjunction with the use of power equipment. Welders are often used in the maintenance of equipment and to complete the connection of certain pieces of material being held in place by power equipment or in the maintenance of such power equipment. Additionally, in the performance of marine construction, welding is done by IUOE members for underwater repair in conjunction with the use of power equipment and barges to maintain and construct marine projects.

### Consolidations

Combine *Backhoe/Loader Combo*, *Backhoe with Tracks* and *Backhoe*– Backhoes are typically utilized in a similar manner and paid in a similar manner, differentiating them completely based on whether they have tracks or not does not make sense.

Moving *Trackhoe* and *Excavator* into its own category- The proposed picklist currently has its Excavators, Trackhoes and Backhoes all in one category. The IUOE strongly disagrees with this grouping. Backhoes are typically brought in to perform smaller projects where it can act as both an excavator and front-end loader capacity, you typically will not see backhoes in wildly varying sizes. However, Excavators and Trackhoes, as will be discussed, are brought in a tremendous variety of sizes depending on the need. These pieces of equipment are less multi-faceted than Backhoes and because their tasks can differ severely, we believe they must be treated differently.

Combine the *Compactor* and *Roller*- These pieces of equipment usually work hand in hand and many rollers now come with a compaction and vibration features

Remove *Asphalt concrete lay down*; Combine *Asphalt Spreader*, *Paver* and *Finisher* to read *Paver/ Spreader/ Finisher equipment (asphalt, aggregate, & concrete)*- The IUOE believes the previous phrasing and spreading of classifications does not make good sense, as they are multiple classifications for what are essentially the same equipment and processes. The IUOE believes combining this equipment is consistent with current practices and will make more sense to stakeholders.

### Removals

*Scissor lift*- Scissor lifts are a tool of the trade used by all crafts to elevate themselves and their tools to where the work is being performed. The IUOE is not aware of a practice across the country where Scissor lifts are a singular equipment operator job and thus it's inclusion in the Power Equipment Operator category is inappropriate.

*Chipper* and *Hydroseeder* - While both are typical pieces of Power Equipment operated by IUOE members, the IUOE believes they are too much of a niche piece of equipment to be identified

separately on the Davis Bacon Equipment List. The IUOE believes the list should focus primarily on the most utilized pieces of equipment across the country, and therefore, we feel the “Other” type category is the more appropriate category for these pieces of equipment.

### **Measuring and Listing Select Equipment Properly in Classification Picklist**

As previously touched upon, the IUOE steadfastly believes in certain situations the WHD must include sub-classifications and descriptors that properly measures the power equipment that is being entered on the WD-10. As currently constructed, the WHD picklist lists select pieces of equipment as too simplistic and risk diluting wages for some of the construction industry’s most skilled and important positions.

The WHD must consider the disparity in skills and experience it requires to operate certain types and/or sizes of equipment and cannot collect accurate data solely on the basis of “Cranes” or “Excavators” (and others) as homogenous pieces of equipment that incur the same pay rates. To best demonstrate these disparities, the WHD should consider the difference between a Spyder Crane and the Left Coast Lifter. The Left Coast Lifter is a crane that is barged across the world, weighs 8,000 tons, has a lift capacity of nearly 2000 tons and has a 328-foot boom.<sup>2</sup> The Spyder Crane URW094 is a crane that weighs 2400 lbs., has a lift capacity of 1990 lbs. has an 18 foot boom.<sup>3</sup> These disparities are extreme, but IUOE members operate both as crane operators, they require vastly different skills and accordingly are paid vastly different wage rates. The WHD’s failure to measure these difference risks conflating the wages for these two pieces of equipment and diluting which wage prevails. Similarly, just as an excavator can be rented to maintain a small back yard garden, excavators are also used to dig the foundation of the World Trade Center and Sears Tower. The examples go on and on but what remains clear is that currently this is a problem as the list is currently constructed.

To correct this problem, the IUOE proposes that the WHD edit the proposed WD-10 to capture additional information for 13 total pieces of equipment which commonly incur disparate pay rates. To achieve this, the WHD should add optional drop-down sub-categories for 6 pieces of equipment which accurately categorize the exact type of equipment being measured. Additionally, the IUOE believes stakeholders must be able to manually enter vital descriptors for 9 pieces of equipment that measure the size and capacity of the equipment being surveyed. The IUOE proposes, and demonstrates in Addendum A, to allow stakeholders to enter common size designations for various types of power equipment. These designations include, weight (in tons), bucket size in yardage, boom size in length and hoist drums by numbers. . These additional size/capacity identifiers should allow stakeholder to manually select whether the size identifying information they want to add is “Over or Under” and then manually input the relevant information which established the applicable wage rates.

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<sup>2</sup> See, Kramer, P., 2019. [online] Lohud.com. Available at: <<https://www.lohud.com/story/news/local/rockland/tappan-zee/2019/10/21/left-coast-lifter-supercrane-leaves-tappan-zee-bridge-site/4051188002/>> [Accessed 3 August 2022].

<sup>3</sup> See, SPYDERCRANE. 2022. SPYDERCRANE 090 Series | Smallest SPYDERCRANE | Small Crane. [online] Available at: <<https://spydercrane.com/spydercranes/urw090-series-small-cranes>> [Accessed 3 August 2022].



The 13 pieces of equipment the WD-10 must account for with additional categories are as follows:

*Autonomous Power Equipment-* As discussed, the future of autonomous equipment is vast and changes daily. Stakeholders should be encouraged to specify which piece of equipment they are identifying by clarifying whether the wage is for “automated dozers” or “hydro-demolition machines” for example.

*Backhoe/ Backhoe & Loader Combo/ Track Backhoe-* This type of equipment typically receives differential pay based on the weight of the equipment or the cubic yard capacity of its bucket.

*Bobcat/Skid Steer/Skid Loader-* This type of equipment typically receives differential pay based on the weight of the equipment or the cubic yard capacity of its bucket. Further this type of equipment operates in a different manner based on whether it’s on tracks or tires.

*Boom/Crane Truck-* This type of equipment typically receives differential pay based on the weight of the equipment or the length of its boom.

*Crane/Derricks-* As touched upon this piece of equipment is one of the most glaring cases on why these additional categories and measurements must be considered. The term Crane reflects four completely different types of equipment each of which can vary in size and capacity. **Gantry and overhead cranes** are assembled in operated in a manner with permanent supporting structures straddling the job site that the crane moves along to move material across the site. In contrast, **mobile cranes** are easily transportable, can be positioned all over sites and set up using telescopic stabilizes and a boom. **Tower Cranes** are cranes fixed to a concrete slab or structure and has the capability to rise with a high-rise building structure, these types of cranes are synonymous with the construction of buildings and play a distinct role from the other types of cranes. Lastly, **Crawler Cranes** are cranes mounted on large crawler tracks for stability and mobility, these types of cranes have massive lift capacity and construction sites are often built around their positioning. Finally, the WHD must also take into account the pay differential based on the weight of the equipment, or the length of its boom.

*Dragline-* This type of equipment typically receives differential pay based on the weight of the equipment or the length of its boom.

*Drill Rig/ Auger-* This type of equipment typically receives differential pay based on the length of its boom.

*Excavator/ Trackhoe-* Perhaps moreso than others, this type of equipment receives differential pay based on the length of its boom or the cubic yard capacity of its bucket. Further this type of equipment operates in a different manner based on whether it’s on tracks or tires and is classified as a “mini excavator”.

*Loader/ Front End Loader-* This type of equipment typically receives differential pay based on the cubic yard capacity of its bucket and this type of equipment operates in a different manner based on whether it’s on tracks or tires.

*On Site Plants and Pumping-* As discussed above the IUOE proposes that the WD-10 form incorporate and allow stakeholder to choose the following material and pumping plans selections for this category: concrete/ redi-mix, asphalt, freeze, grout, aggregate, well Points/ filtration systems and crusher plants.

*Piledriver (All Types)-* This type of equipment typically receives differential pay based on the weight of the equipment or the length of its boom.

*Small Equipment-* As discussed above the IUOE proposes that the WD-10 form incorporate and allow stakeholder to choose the following for this category: Light Towers, Compressors, Generators, Heaters and Ground Heaters.

*Specialty Bridge and Highway Equipment-* The types of specialty equipment utilized on critical highway and bridge projects are vital and typically require additional skills and experience from typical power equipment operation. Because this equipment can incorporate various pieces, stakeholders should be encouraged to manually identify what pieces of equipment they are entering.

Stakeholders should be able to enter the wage information on the WD-10 form that is on par with the every-day practice, and in order to do so the WHD must make the common-sense distinction on the picklist that incur vastly different rates of pay on construction based on certain variances or sizes of the equipment. The IUOE believes these sub-classes and other descriptors must be a part of the WD-10 to be entered to properly distinguish between equipment to determine the appropriate wage rates.


### **Conclusion**

In closing, while the IUOE is conflicted, it remains supportive of the wholesale changes this classification list will make. The IUOE wants to reiterate that the existing equipment input problems directly relate to issues arising out of the Mistick decision, which has upended the previously accepted Power Equipment publishing on Wage Determinations. The IUOE hopes that the “**Updating the Davis Bacon and Related Acts**” proposed rules will help fix that poorly reasoned decision and return to a place where the WHD is willing to adopt CBA groups of Power Equipment when an IUOE Local can demonstrate it thoroughly prevails on the area measured by the Wage Determination. Without common sense applications of CBA groups, Power Equipment wage publications continued to be muddled by the Conformance process. We hope that the WHD, in analyzing this problem and proposing this solution also sees that the manner in which it operated pre-Mistick allowed for the publication of Power Equipment Operators rates, whether union or not.

In the interim, the IUOE believes if the WHD intends to follow through with the classification picklist, it must take the above ideas into account. We hope these comments will demonstrate that Power Equipment is not a “one size fits all” concept, and that when measuring delicate wage data, the WD-10 form must take care to encapsulate the nuances that sophisticated and knowledgeable parties take into account when negotiating wages.

Please do not hesitate to contact the IUOE with any questions, as we are happy to assist in any manner required to ensure that the Power Equipment is measured in an accurate and efficient manner for Davis Bacon purposes.

Respectfully submitted,



JAMES T. CALLAHAN  
GENERAL PRESIDENT

cc: Terry George, Director of Davis Bacon  
James J. Callahan, Assistant Director of Davis Bacon  
Matthew G. McGuire, General Counsel

## ADDENDUM A

4000. Power Equipment Operator	Sub-Class (Equipment Type)	Size Identifier (Weight/Boom/Bucket)
4001. Autonomous Power Equipment	<i>Manual Enter Name of Equipment</i>	
4002. Articulating End Dumps		
4003. Assembly/Disassembly Engineer		
4004. Backhoe/ Backhoe & Loader Combo/ Track Backhoe		<b><u>Bucket:</u></b> Over/Under ____ Cu Yds. <b><u>Weight:</u></b> Over/Under _____ Tons
4005. Bobcat/Skid Steer/Skid Loader	<ul style="list-style-type: none"> <li>• A) Rubber Tire</li> <li>• B) Track</li> </ul>	<b><u>Bucket:</u></b> Over/Under ____ Cu Yds.
4006. Boom/Crane Truck		<b><u>Boom:</u></b> Over/Under _____ Feet <b><u>Weight:</u></b> Over/Under _____ Tons
4007. Boring Machine		
4008. Boat/ Barge Operator		
4009. Breaker		
4010. Broom/Sweeper		
4011. Bulldozer		
4012. Compactor/Roller		
4013. Concrete Cutter/Saw		
4014. Concrete Pump Truck		
4015. Crane/Derricks	<ul style="list-style-type: none"> <li>• A) Tower</li> <li>• B) Overhead/Gantry</li> <li>• C) Crawler</li> <li>• D) Mobile</li> </ul>	<b><u>Boom:</u></b> Over/Under _____ Feet <b><u>Weight:</u></b> Over/Under _____ Tons <b><u>Drums:</u></b> _____ Drums
4016. Curb/Gutter Machine		
4017. Dragline		<b><u>Boom:</u></b> Over/Under _____ Feet <b><u>Bucket:</u></b> Over/Under ____ Cu Yds.
4018. Drill Rig/ Auger		<b><u>Boom:</u></b> Over/Under _____ Feet
4019. Drone Operator		
4020. Excavator/ Trackhoe	<ul style="list-style-type: none"> <li>• A) Rubber Tire</li> <li>• B) Track</li> <li>• C) Mini</li> </ul>	<b><u>Boom:</u></b> Over/Under _____ Feet <b><u>Bucket:</u></b> Over/Under ____ Cu Yds.
4021. Forklift		
4022. Gradall		
4023. Helicopter		
4024. Hoist/ Elevator (Material and Personnel)		

4025. Horizontal Directional Drill		
4026. Motor Grader/ Blade		
4027. Loader/ Front End Loader	<ul style="list-style-type: none"> <li>• A) Rubber Tire</li> <li>• B) Track</li> </ul>	<b>Bucket Size:</b> Over/Under _____ Cu Yds.
4028. Locomotive		
4029. Telehandler/ Lull/ All Terrain Forklift		
4030. Material Transfer Device/ Buggies		
4031. Material Testers		
4032. Mechanic		
4033. Milling Machine		
4034. Maintenance Engineer/ Oiler		
4035. On Site Plants and Pumping	<ul style="list-style-type: none"> <li>• A) Concrete/ Redi-mix</li> <li>• B) Asphalt</li> <li>• C) Freeze</li> <li>• D) Grout</li> <li>• E) Aggregate</li> <li>• F) Well Points/ Filtration systems</li> <li>• G) Crusher</li> </ul>	
4036. Paver/ Spreader/ Finisher equipment (asphalt, aggregate, & concrete)		
4037. Piledriver (All Types)		<b>Boom:</b> Over/Under _____ Feet  <b>Weight:</b> Over/Under _____ Tons
4038. Pounder		
4039. Water Pumps (All types)		
4040. Scraper		
4041. Concrete Screed Equipment		
4042. Small Equipment	<ul style="list-style-type: none"> <li>• A) Light Towers</li> <li>• B) Compressors</li> <li>• C) Generators</li> <li>• D) Heaters</li> <li>• E) Ground Heaters</li> </ul>	
4043. Specialty Bridge and Highway Equipment	<i>Manual Enter Name of Equipment</i>	
4044. Stabilizer/Till		
4045. Surveyor		
4046. Tele-belt/ Material Conveyor Belts		
4047. Tractor (Side Boom etc.)		
4048. Trencher		
4049. Trucking of Power Equipment/Low Boy		
4050. Vacuum Truck/ Hydro-Excavator		
4051. Welder/ Welding Machine		