

Paula J. Hammond Secretary of Transportation

March 16, 2010

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OSHA Docket Office
Docket No. OSHA-2009-0045
U.S. Department of Labor, Occupational Safety and Health Administration
Room N-2625
200 Constitution Ave. NW.
Washington, DC 20210.

RE: Strategic Aerial Lifts; Extension of the Office of Management and Budget's (OMB) Approval of an Information Collection (Paperwork) Requirement, Request for Information, Docket No. OSHA-2009-0045.

The Washington State Department of Transportation (WSDOT) has reviewed the OSHA Docket Number 2009-00451 as it pertains to its proposal to extend OMB approval of the information collection (paperwork) requirement contained in the Aerial Lift Standard. We understand that OSHA's request for extension is to enable OSHA to enforce the manufacturer certification requirement of the Aerial Lift Standard in the event employers modify an aerial lift for uses other than those provided by the manufacturer.

WSDOT concurs with OSHA's proposal for extending the certification requirement specified in the Aerial Lift Standard as it demonstrates that the manufacturer or an equally-qualified entity has assessed a modified aerial lift as safe for use by workers.

Thank you for the opportunity to comment on OSHA Docket Number 2009-00451.

Sincerely,

Paula J. Hammond, P.E. Secretary of Transportation

cc: John Horsely, AASHTO

Steve Reinmuth, WSDOT Jerry Lenzi, WSDOT

Chris Christopher, WSDOT

Larry Ehl, WSDOT