

Michael zelesnik

March 19, 2014

PO Box 81

Wickhaven, PA 15492

Department of Labor

Occupational Safety and Health Administration

OSHA Docket Office

Attention: Docket No, OSHA-2010-0055

Re: Recordkeeping and Reporting Occupational Injuries and Illnesses; Extension of the Office of Management and Budget's Approval of Information Collection Requirements

Dear sir or madam;

In regards to the Occupational Safety and Health Act (OSH Act) and 29 CFR part 1904 due to expire on May 31, 2014, I am writing to express my approval for an extension of 29 CFR part 1904. The collection requirements are fair and uncomplicated in method and burden. I cannot speak for the performance of your agency and its functions, but I can speak to the ease of collecting the data and the method of recording and reporting the data. The data collected by my company has resulted in immediate safety and health benefits for both the employees and the employer alike.

Once safety trained on in all OSHA mandated requirements both on initial hire and during special refresher training, the employees are taught the importance of the injury and illness record. They have been shown how the information is used to provide our company with data from the Bureau of Labor and Statistics such as the Days Away Restricted Time (DART) and the Total Recordable Case Rate (TRCR). For instance our 2013 DART rate was 0 and that is below the national average for our industry, which is at 2.0. Our TRCR rate is at 5.45, but the national average for our industry is 7.2. I only mention these numbers and statistics for one reason, the numbers, and the knowledge in what the numbers mean and stand for make work safer!

When the employees see the numbers, they work safer so the numbers can be driven lower for the next year. This has had a most profound effect on my company. We have just this past summer, sought out and achieved our 3rd award from the OSHA's Safety and Health Achievement Recognition program (SHARP). This speaks to the quality, utility, and the clarity of the information that is collected,

I also wish to state that I would like to keep the current method of reporting and recording the information on illnesses and injuries. I do not wish for this information to be decimated through any automated technology, or transmission techniques. To be required to file the information electronically leads this information into an area that I feel it doesn't need to go. We are currently required to post the OSHA 300A and we cannot post any information on the names or identifying information on the employees.

There is information on these forms that should not be made public and there are certain rules in the medical field such as "The Health Insurance Portability and Accountability Act of 1996 (HIPAA)", that can be used as a justification for not losing control of the documentation or anything that has personally identifiable information contained within. OSHA requires the employer to put personally identifiable information on the forms, so it becomes a problem on many fronts.

