

[DATE]

OSHA Docket Office
Room N-2625
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Concerning: Docket No. OSHA-2008-0012, the Advanced Notice of Proposed Rulemaking (ANPRM) for Tree Care Operations.

To Whom It May Concern:

My company endorses the idea of developing an OSHA Standard for tree care operations, so long as it is based upon the most recent revision of the ANSI Z133.1, American National Standard for Arboricultural Operations – Safety Requirements.

Our firm is headquartered in [city, state] and has [number] full-time employees engaged in [briefly describe services you provide].

We have two overarching comments: First, we firmly believe that it is vital for any Tree Care Operations standard adopted by OSHA be based upon the existing ANSI Z133.1 Safety Standard. The ANSI Z133 standards-making body pre-dates OSHA. The Standard was developed and has been continuously revised through a consensus process by recognized industry safety experts from diverse tree care backgrounds, including representatives of labor, management, academia and government. Its performance-based requirements are derived from hundreds of years of collective experience and millions upon millions of man-hours in tree care operations.

Second, our company fully supports the comments and data submitted to the docket by the Tree Care Industry Association.

[I/My management team/My employees and I] carefully reviewed the numerous questions OSHA asks in the ANPRM and we would like to specifically address the following questions from our company's perspective:

[Please refer to TCIA's online list of OSHA questions and answers that you can access here: http://www.treecareindustry.org/public/gov_osh_questions_answered.htm]