

- 1. Pg. 1 under (520 CMR 6.06) the "M" in the title M.G.L. is being taking out. We see no reason for this since the public relates the standards to M.G.L
- 2. Pg. 8 the state added "Interstate Medical Waiver from the Massachusetts Registry of Motor Vehicles". This will exclude anyone from any other state. For example, we are a business out of Bellingham MA and send our people to a clinic in Smithfield RI.
- 3. Pg. 15 we really cannot see what you are looking for by adding "Organizations seeking approval shall include but may not be limited to public and private education facilities and employer provided training programs". By adding the "but may not be limited to" keeps everything the same as before. Can you please clarify?
- 4. Pg. 18 (c. Class 3) and Pg. 37 (b) 1A the state has eliminated "Tower and Electric". We would like know what license will be needed for a Tower Crane.
- 5. Pg. 22 (6.03 (3)) Is this section the same as the pg. 24 (6.07 In-Service Training Program for Exempt Companies)?
- 6. Pg. 23 (3) eliminates the need for all employees to hold a physical license created by the employer.
- 7. Pg. 24 It goes over the In-Service Training Program. At the bottom of this page it mentions that companies still need to hand out physical licenses to their trained employees. If section 3 on page 23 is the same as this page then it is contradicting one another. Please clarify.
- 8. Pg. 30 (18) "No person shall operate Hoisting Machinery without a valid driver's license." This is okay for heavy/construction equipment (2A,2B,2C,2D,1A,1B). But for the people who work in the industrial industry, they don't always have a need to hold a drivers license. Some people live in the city and take public transportation, carpool, etc...
- 9. Pg. 39 (4) the 4A has been eliminated. What will happen to all the people who hold 4A licenses?

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