

Steven Carley,

I have reviewed the proposed changes to 520CMR 6.00. I understand most of the proposed changes but do believe there needs to be more clarification.

The Removal of the 4A license and replace it with 6 licenses B-G, will current holders of the 4A license now have the 6 licenses in the 4 class? That will mean going from 4 hours of Continuing Education for the license to 12 hours. That seems excessive even with the proposed reduction of multiple class Continuing Education. Could a 4 hour continuing education class be sufficient to cover that?

In the Class 3, I understand the removal of the tower crane from that class, but the tower crane language must be inserted into the 1A class. Tower crane are very different than land based cranes and could possibly have their own classification. The 3A now covers Overhead Gantry Cranes , Marine Lifts, and jib cranes. Should Mobile Gantry Cranes also included?

Municipal Limited class- what will the continuing education requirements be for this class license? What is the difference in information between this and a multiple license test 1C, 2B and 4G?

I agree with the idea of a single license to cover one piece of equipment. I still believe that there can be more revisions in the license classes. Catch basin cleaners and sign hanging equipment are basically cranes, why aren't they covered in the 1 class? Industry equipment is constantly evolving and changing. The license requirements should reflect that. Licensing should require instruction and study. It should not be easy

There has always been a problem with Industry interpreting the Law and it's requirements. I do believe having an Industry Review Board would be helpful to both industry and the Department of Public Safety. If there is any way I can be of help please let me know

Doug Fay  
Training Director  
IUOE Local 98