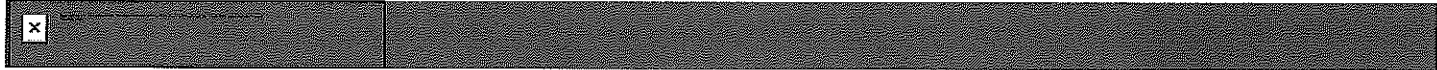


**From:** noreply@formstack.com  
**Sent:** Thursday, February 25, 2016 1:27 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform



## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/25/16 1:26 PM

**Name (optional)::** Barbara Burr

**Company/Organization (if applicable) (optional)::** Burr Brothers Boatyard

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (if known): :**

**General Regulatory Themes::** Public Safety

**Please list the Agency or Agencies affiliated with this regulation::** 520 CMR 6.00 Hoist Regulation

**Describe the regulatory issue or observation::** A DOT health card is required for all hoist licenses, even fork lifts that will be used on private property.

The DOT health card used to be easy to get. Stand on one leg, read a chart across a room, and leave behind some drug free pee in a cup. That test has been radically changed to address the serious health issues of CDL drivers who travel long distances across state lines. Their average age is 51, and their average age at death is 61. The lever arm to address sickly big rig drivers on our highways is the DOT health Card.

For a small private company, this high requirement for a health card is robbing us of our most experienced operators. One fellow has a cataract, one has diabetes, one has a heart abnormality. These guys are teachers and role models. And their health is managed, and not a threat to safe operation of a forklift, or even running the crane.

**Suggestions for improvements to the regulation::** This federal DOT Health Card form states plainly in its introduction, "for intrastate travel".

The requirement for a health card amounts to age based discrimination and should be eliminated.

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