

Mr. Michael Bell
Descent Control Inc.
P.O. Box 400
Warrington, Pennsylvania 18976
Dear Mr. Bell:

This is in response to your July 15 inquiry requesting a clarification of a section of the March 12 memorandum to all Regional Administrators of the Occupational Safety and Health Administration (OSHA) concerning the use of descent control equipment by employees performing building exterior cleaning, inspection and maintenance.

I understand that you have already spoken to someone in OSHA on this subject, but that you need written confirmation for one or more of your clients.

I hope the following information will be of help to you:

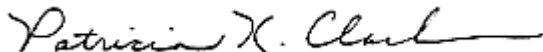
The question at issue is the meaning of item # 8 on the second page of the above mentioned memorandum, (copy enclosed).

The intent of this item is to ensure that employees are furnished with a device or devices to provide intermediate stabilization for descents in excess of 130 feet (stabilization at the specific work location, i.e. window). A device could be something as simple as an acceptable suction cup attached to the worker's seat board by a short lanyard.

Item number one on page one of the memorandum would require that the worker be properly and effectively trained in the use and application of such stabilization devices.

I trust that the above will satisfy your needs, but if further assistance is required, please do not hesitate to contact my office again.

Sincerely,



Patricia K. Clark, Director
Directorate of Compliance Programs

Enclosure