



April 20, 2016

Mayor John Cranley  
City of Cincinnati  
801 Plum St., Suite 150  
Cincinnati, OH 45202

Dear Mayor Cranley:

The Specialized Carriers & Rigging Association (SC&RA) is an international trade association of more than 1,300 members from 46 nations. Members are involved in specialized transportation, machinery moving and erecting, industrial maintenance, millwrighting and crane and rigging operations, manufacturing and rental. SC&RA helps members run more efficient and safer businesses by monitoring and affecting pending legislation and regulatory policies at the state and national levels; researching and reporting on safety concerns ; establishing best business practices; and providing four yearly forums where these and other relevant member issues can be advanced.

We recently received a copy of the City of Cincinnati's proposed Ordinance modifying Title XI, "Cincinnati Building Code", of the Cincinnati Municipal Code by both amendments to sections and introducing new sections addressing crane operations within the City's limits. While we understand the Ordinance was developed to "ensure that the operation of cranes within the City of Cincinnati conforms to nationally recognized standards and that the City's Department of Buildings and Inspections is informed of any planned crane operation and provided proof of adherence to the relevant national standards for training and certification of crane operators, maintenance and age of equipment, and operation of cranes," some of the proposed regulations are overly onerous and impractical to modern day crane operations without any substantiated benefit to safety.

For example, there is no research which supports the notion that the age of a crane impacts safety. In fact, both the U.S.-based organization representing crane manufacturers, the Association of Equipment Manufacturers (AEM) and its international counterpart, the European Materials Handling Federation (FEM), both agree that there is no correlation between a crane's age and crane accidents. Proper inspections and maintenance are the true factors in the safety and life of a crane. Neither of which are mentioned in the proposed Ordinance. Additionally, the required liability insurance coverage suggested is not consistent with industry practice. The proposed limitations will provide an unfair competitive advantage to larger companies and will certainly restrict smaller ones from bidding and working on projects within the City's limits. We're confident that is not the City's intent by introducing the proposed language.

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We would like the opportunity to discuss our recommended changes to the proposed Ordinance to provide additional insight as to the industry's rationale for the changes. Obviously, our intent is to meet with you prior to the city council's call for a hearing and we appreciate that time is limited. Please advise on possible dates so that we can make the necessary arrangements to travel to Cincinnati and meet with you. We appreciate your consideration of our request and look forward to discussing these items further.

Best Regards,

A handwritten signature in blue ink, which appears to read "Beth A. O'Quinn". The signature is fluid and cursive, with a long horizontal stroke at the end.

Beth A. O'Quinn  
Vice President

cc: Crane & Rigging Group Governing Committee  
Joel M. Dandrea