



PROPOSAL FOR AN ERGONOMICS PROGRAM STANDARD

Frequently Asked Questions (FAQs)

BACKGROUND

Q1: What is ergonomics?

A1: Ergonomics is the science of fitting the job to the worker. When there is a mismatch between the physical requirements of the job and the physical capacity of the worker musculoskeletal disorders (MSDs) can result. For example, workers who must repeat the same motion throughout their workday, who must do their work in an awkward position, who must use a great deal of force to perform their jobs, who must repeatedly lift heavy objects or who face a combination of these risk factors are most likely to develop MSDs.

Q2: What are musculoskeletal disorders (MSDs)?

A2: MSDs are injuries and disorders of the muscles, nerves, tendons, ligaments, joints, cartilage and spinal discs. They do not include injuries resulting from slips, trips, falls or similar accidents. Examples of MSDs include carpal tunnel syndrome, tendinitis, sciatica, herniated disc and low back pain.

Q3: How serious a problem are work-related MSDs?

A3: Work-related MSDs are the most prevalent, most expensive and most preventable workplace injuries in the country:

- Work-related MSDs account for more than 1/3rd of all occupational injuries and illnesses that are serious enough to result in days away from work.
- More than 600,000 employees suffer lost-workday MSDs each year.
- These injuries cost business \$15 to ? billion in workers' compensation costs each year. Total direct costs may run as high as \$45 to ? billion.

Q4: What causes work-related MSDs?

A4: Work-related MSDs occur where there is a mismatch between the physical requirements of the job and the physical capacity of the worker. Prolonged exposure to ergonomic risk factors, particularly in combination or at high levels, is likely to cause or contribute to an MSD or aggravate the severity of a pre-existing MSD. The longer and more often the exposure to ergonomic risk factors, the longer the time needed to recover from the exposure to ergonomic risk factors. The proposed Ergonomics Program Standard covers the following risk factors:

- Force

- Repetition
- Awkward postures
- Static postures
- Vibration
- Cold temperatures

Q5: Why do women experience high rates of work-related MSDs?

A5: Women suffer high rates of work-related MSDs because of the types of jobs in which they often work -- not because their bodies are more vulnerable to MSDs. A large number of women work in jobs associated with high levels of repetitive motions, heavy lifting, awkward postures, and other physical work activities causing work-related MSDs, such as lifting patients in nursing homes, sewing clothing and other apparel, or using a keyboard.

Q6: What are the solutions to eliminate or reduce MSDs and related costs?

A6: MSDs are often very easy to prevent. Adding a book under a monitor, or padding a tool handle are typical of the fixes used in ergonomics programs. Solutions that fit the work to the worker are achieved by companies that implement an ergonomics program. Thousands of employers have adopted them. A study by the General Accounting Office found employers' ergonomics programs effective at reducing injuries. Practical experience in solving ergonomics problems is plentiful. Ergonomic interventions may include:

- Adjusting the height of working surfaces to reduce long reaches and awkward postures.
- Putting work supplies and equipment within comfortable reach.
- Providing the right tool for the job and the right tool handle for the worker.
- Varying tasks for workers (e.g., job rotation).
- Encouraging short authorized rest breaks.
- Reducing the weight and size of items workers must lift.
- Providing mechanical lifting equipment.
- Using telephone headsets.
- Providing ergonomic chairs or stools.
- Supplying anti-fatigue floor mats.

Q7: What are the essential elements of an effective ergonomics program?

A7: The following program elements are essential to an effective ergonomics program:

- Management Leadership and Employee Participation
- Hazard Information and Reporting
- Job Hazard Analysis and Control
- Training
- MSD Management

- Program Evaluation

Experts, available literature and many employers agree that, to be effective, ergonomics programs need to include these basic elements. These core elements are typical of any comprehensive safety and health program such as the **OSHA Safety and Health Program Management Guidelines**, the **OSHA Meatpacking Guidelines**, the draft consensus standard developed by the ANSI Z-365 committee, and many State safety and health program regulations.

Q8: Do workplace ergonomics programs actually work?

A8: Employers of all sizes have had great success in using ergonomics programs as a cost-effective way to prevent or reduce MSDs, keeping workers on the job and boosting productivity and workplace morale. A recent General Accounting Office study of several ergonomics programs found that these programs reduced MSDs and associated costs for those employers (GAO/HEHS-97-163). GAO also found that the programs and specific job fixes were not necessarily costly or complex for employers. (The GAO report can be accessed in the publications section of OSHA's Ergonomics Web page.)

Many employers have used a flexible framework that includes the six key elements mentioned above. Some examples of their success include:

- **Red Wing Shoes** (Minnesota shoe manufacturer) cut workers' compensation costs by 75%, even after adding two new plants. They modified work stations and gave employees adjustable chairs.
- **Fieldcrest-Cannon** (Georgia textile manufacturer), working with their union, cut MSDs from 121 to 21 in just 3 years. They credit their success to worker involvement in designing systems to limit the need for workers to bend and reach.
- **Fresno Bee** (California newspaper) reduced medical and temporary disability costs by 80% and saw an improvement in employee morale. The Bee redesigned adjustable workstations, instituted timed work breaks, and paid for eyeglasses, if needed, to read video display terminal screens.
- **Perdue Farms** (East Coast poultry processor) started an ergonomics program in 1991. It was so effective that the company expanded the program to all its plants. Although the average lost workday injury and illness rate for poultry processing is about 12 per 100 full-time workers, six Perdue plants had no lost time injuries in 1996. Perdue improved its workstations and instituted a wellness program.
- **Woodpro Cabinetry** (Missouri cabinet manufacturer) saved \$42,000 in workers' compensation costs by bringing down its injury rates. The company added a conveyor to reduce the workers' need to lift and carry materials.

OSHA agrees that the basic program approaches implemented by these and many other companies are the most effective way to reduce MSDs and should guide the development of a flexible, performance-based program standard. In addition, the fact that employers already are achieving positive results is the best available evidence that ergonomics programs are feasible in controlling MSD hazards and reducing MSDs.

Q9: What scientific evidence supports the publication of an ergonomics program standard?

A9: A substantial body of validated scientific research and other evidence supports OSHA's effort to provide workers with ergonomic protection. This evidence, which is comprised of epidemiological, biomechanical and pathophysiological studies as well as published anecdotal evidence, includes:

- More than 2,000 articles on MSDs and workplace risk factors.
- A 1998 study by the National Academy of Sciences (NAS) on MSDs.
- A 1997 critical review by the National Institute of Occupational Safety and Health (NIOSH)

of more than 600 epidemiological studies.

- A 1997 General Accounting Office study of companies with ergonomics programs.
- Hundreds of published "success stories" about companies with ergonomics programs.

The evidence strongly supports two basic conclusions:

1. There is a positive relationship between musculoskeletal disorders and workplace risk factors, and
2. Ergonomics programs and specific ergonomic interventions can reduce these injuries.

For example, the NAS study found a clear relationship between MSDs and work. In addition, they concluded that "research clearly demonstrates that specific interventions can reduce the reported rate of musculoskeletal disorders for workers who perform high-risk tasks" (***Work-related Musculoskeletal Disorders: The Research Base*** (ISBN 0-309-06327-2 (1998))). The NIOSH review also supports these conclusions. (The NAS and NIOSH studies can be accessed in the publications section of OSHA's Ergonomics Web page.) The overwhelming body of scientific evidence points to these conclusions:

- Increasing levels of workplace risk and exposure increases the incidence and severity of MSDs.
- Reducing workplace risk and exposure reduces the incidence and severity of MSDs.
- MSDs are preventable.
- Ergonomics programs are the most effective way to reduce risk, decrease exposure and protect workers against MSDs.

Q10: Why is OSHA proceeding before the NAS completes a second review of the literature?

A10: As mentioned, a large body of validated scientific research already exists to support the proposed Ergonomics Program Standard. Scientists will continue to study MSDs and more discoveries will be made, just as we still are learning more about the link between smoking and cancer. Further delay in proposing an ergonomics rule is unwise and unnecessary and will delay needed protection for millions of workers. A number of organizations have urged OSHA not to delay the rulemaking. In the words of the American College of Occupational and Environmental Medicine, the world's largest occupational medical society, "there is an adequate scientific foundation for OSHA to proceed with a proposal and, therefore, no reason for OSHA to delay the rulemaking process while the National Academy of Sciences panel conducts its review." In fact, at the time that funding of a second NAS study was being discussed, then Appropriations Chairman Livingston and Ranking Member Obey told OSHA that the intention in funding the study was not to delay OSHA's rulemaking efforts.

In addition, OSHA does not believe that delaying the proposed rule is necessary since the second NAS review is not producing new scientific research. It is reviewing the existing evidence that both NIOSH and NAS reviewed previously, and also answering the same questions that were posed in the first study. In the conclusion of their first study, NAS stated "[t]hat while there are many points about which we would like to know more, there is little to shake our confidence in the thrust of our conclusions, which draw on converging results from many disciplines, using many methods" that:

- There is a clear link between MSDs and work,
- There is a higher incidence of reported MSDs among individuals who are employed in jobs where there is a high level of exposure to ergonomic risk factors, and
- Ergonomic interventions can reduce the risk of injury.

The findings of a second NAS review, as well as those of other new ergonomics studies are

welcome. However, as NAS said, they are not likely to alter the conclusions of the overwhelming body of evidence that:

- MSDs are linked to work,
- Higher physical stress, particularly the presence of two or more risk factors, increases the prevalence of MSDs,
- Most people face their greatest exposure to ergonomic risk factors at work,
- Workers in manual handling jobs have more back injuries and people with repetitive hand work (e.g., red meat production lines) have more carpal tunnel syndrome (and other related repetitive motion injuries), and
- Reducing physical stress on the job reduces the risk of injury.

OSHA will examine NAS's review and all research that becomes available during the rulemaking process, to ensure that OSHA's ergonomics program standard is based on the best available evidence.

Q11: Is an ergonomics standard needed since OSHA is also planning to promulgate a safety and health program rule?

A11: An ergonomics program standard is needed regardless of whether a separate regulation on safety and health programs is promulgated. OSHA's draft safety and health program regulation is very basic and it creates no new obligation to control hazards that employers don't already have under OSHA standards or the General Duty Clause of the OSH Act. The safety and health program rule will create a framework for employers to use to systematically ensure they meet their current obligation to keep workers safe and healthy. The proposed Ergonomics Program Standard, on the other hand, specifies the employer's obligation to control MSD hazards and provide MSD management for injured employees. Companies have told us that they have integrated ergonomics into their safety and health programs or their quality programs, and have been successful at reducing MSDs. Nothing in the proposed rule would make employers alter this approach.

THE PROPOSED RULE

Q12: Why do we need an ergonomics standard now?

A12: Work-related musculoskeletal disorders (MSDs) are now a leading cause of lost-workday injuries and workers' compensation costs.

- MSDs account for 34% of all lost-workday injuries and illnesses (Bureau of Labor Statistics).
- More than 620,000 lost-workday MSDs are reported each year (BLS).
- MSDs account for \$1 of every \$3 spent for workers' compensation.
- MSDs each year account for more than \$15-\$20 billion in workers' compensation costs. Total direct costs add up to as much as \$60 billion.
- Carpal tunnel syndrome (CTS), one form of MSD, results on average to more days away from work than any workplace injury. The median days away from work for CTS is 25 days, as compared to 17 days for fractures and 20 days for amputations.
- Workers with cases of severe injury can face permanent disability that prevents them from returning to their jobs or handling simple, everyday tasks like picking up their child, combing their hair, or pushing a shopping cart.
- MSDs are preventable.

Thousands of companies have taken action to address and prevent these problems. Their efforts

have provided us with valuable experience on which to build an ergonomics program standard.

Q13: Why is OSHA using a program approach to its ergonomics standard?

A13: A program approach is more flexible and allows for adaptation to workplaces of all sizes. Many stakeholders have told us they use a program approach and urged that OSHA develop the proposed rule based on the program in the *Meatpacking Guidelines*. In addition, OSHA believes a program approach is appropriate in those jobs and workplaces where MSDs cannot be eliminated completely. A program approach ensures employers have a systematic, working process in place so they will be able to take quick and effective action when MSDs do occur.

Q14: What industry sectors does the proposed rule cover?

A14: The proposed ergonomics standard covers workers in general industry. Construction, maritime and agriculture operations will be covered in future rulemaking.

Q15: What jobs does the proposed rule cover?

A15: The proposed ergonomics rule covers these jobs:

- Manufacturing jobs (production jobs that account for a significant amount of an employee's work time),
- Manual handling jobs (those positions where the core element of the job requires forceful lifting/lowering, pushing/pulling and carrying), and
- Other jobs in general industry where a covered MSD occurs.

Q16: How did OSHA decide which jobs should be covered in the proposed rule?

A16: Every year MSDs are reported in virtually every industry in the nation. Because of the breadth of this problem, OSHA believes it is necessary to undertake its rulemaking efforts sequentially, by focusing first on those areas in general industry where the problem is most severe and where the solutions are well-demonstrated. The incidence of MSDs is particularly severe in manufacturing and manual handling jobs in general industry. In addition, a number of workers in other jobs also experience MSDs. Where workers are getting hurt, their employers need to address this problem.

- Manufacturing and manual handling operations account for about 60% of all lost-workday MSDs, while employing only 28% of the general industry workforce.
- Incidence rates for lost-workday MSDs are as high as 30.4 and 42.4 in certain manufacturing and manual handling operations, respectively.
- While the rest of general industry does not account for as large a percentage of lost-workday MSDs, a high percentage of some of the most severe MSDs (e.g., carpal tunnel syndrome), are in pockets within these industries.

Thousands of companies have ergonomics programs. Most of these companies are in general industry. Likewise, the majority of research on ergonomic programs is in general industry. This research and experience provide substantial evidence that ergonomic solutions are well-known in general industry.

Q17: Why does a covered MSD have to occur before employers must analyze and fix jobs?

A17: There are several reasons why OSHA believes that for an ergonomics rule it may be appropriate to use an OSHA recordable MSD to trigger employer requirements to analyze and control jobs. MSD hazards are multifactorial, that is, they usually involve exposure to a combination of ergonomic risk factors. The multifactorial nature means that it may be less certain what combination of risk factors may be reasonably likely to cause or contribute to an MSD in a particular job. An OSHA recordable MSD, on the other hand, is a concrete and fairly objective measure about whether problems are likely to exist in a job.

Also, because of the breadth of the problem (i.e., ergonomic risk factors are present in many jobs), OSHA believes it may be appropriate for employers to focus on the most serious problems first: those jobs in which an OSHA recordable has been reported. The incident trigger focuses employers on analyzing and controlling these jobs first rather than requiring employers to expend their resources on analyzing all jobs at the outset. This targeting of the proposal so that actions employers must take are appropriate to the nature and severity of the problems in their workplace, helps to minimize burdens on employers. It does this by limiting the number of jobs employers must address at one time and limiting the action employers must take if they only have very limited or isolated problems.

The proposal leaves employers free to develop ergonomics programs that use triggers that are more sensitive. Many employers already initiate action at early points before MSD symptoms progress to recordable injuries -- something OSHA encourages. By suggesting the use of a single incident trigger, OSHA is contemplating a minimum threshold for when an employer would need to take action under the proposed standard.

The incident trigger OSHA has selected, a single OSHA recordable MSD, ensures that employers respond to employees early when the MSD is more likely that permanent damage or disability has not occurred. It is a more sensitive trigger than other alternatives such as a case where an employee has received workers' compensation for the MSD or where multiple MSDs have been reported in the job.

Q18: Will the standard make employers responsible for MSDs that are not caused by work?

A18: No. The proposal would not require employers to implement controls or provide MSD management if the employer determines that the MSD is not an OSHA recordable and does not meet the screening tests for coverage. To ensure that only MSDs that have a strong nexus between the MSD reported and the physical work activities and conditions of the job **are covered**, the proposal includes two screens for determining work-relatedness. These screens go beyond the work-relatedness criteria in the OSHA recordkeeping rule. These screens are:

- The physical work activities and conditions in the job are reasonably likely to cause or contribute to the type of MSD the employee reported, and
- These activities and conditions are a core element of the job and/or make up a significant amount of the employee's work time.

Q19: Don't many people get back pain and rarely know the cause?

A19: It is true that many people will experience an episode of back pain in their lifetime. Nonetheless, in their 1997 peer-reviewed comprehensive study on MSDs, NIOSH found reliable evidence that job-related heavy physical work and awkward postures are associated with low-back disorders. NIOSH also found strong evidence that prolonged exposure to work-related lifting, forceful movements and whole body vibration increase the probability that a worker would develop a back injury. MSDs of the lower back would be covered by the proposed rule where the exposures to the physical stresses are present for a significant amount of the employee's worktime or are a part of the core element of the employee's job.

Q20: How much will this cost employers?

A20: Good ergonomics is good economics. Many stakeholders have told OSHA that ergonomics programs produce a net economic gain because they reduce MSDs and improve performance. The proposal also seeks to limit costs of controlling MSD hazards by limiting application of the ergonomics program to the jobs in which an MSD has occurred rather than requiring employers to develop a facility-wide program as a response to a single problem job.

OSHA estimates that on a national basis MSDs cost employers \$15-\$20 billion a year in workers' compensation costs alone. Total direct costs may be as high as \$60 billion a year. OSHA has estimated that annually the proposal will cost \$700 per establishment covered by the proposal and \$150 per problem job fixed. OSHA also estimates that the proposal will generate savings of about \$9 billion annually. These estimates are consistent with the experience of employers with

ergonomics programs.

Q21: Will an Ergonomics Program Standard result in the loss of jobs due to automation?

A21: The standard does not require automation. In addition, much evidence indicates that companies with ergonomics programs achieve substantial bottom-line improvements with less-costly solutions than automation.

Q22: Will the standard require employers to slow down production to be in compliance?

A22: No. The proposed rule is flexible and allows employers to decide the best way to control MSD hazards. The proposed rule does not contain control specifications (e.g., lifting limits, repetitions per minute); rather employers are free to select controls to materially reduce hazards from among a range of engineering, work practice and administrative controls. Experience shows that employers with good ergonomics programs not only reduce MSDs and workers' compensation costs, but improve productivity as well.

Q23: Will employers have to hire expensive consultants to comply with the standard?

A23: No. This is what about 1,500 employers and stakeholders attending OSHA conferences and meetings have told us. These employers said they were able to set up effective ergonomics programs themselves, without bringing in consultants. They told OSHA this was possible because of the flexibility, practicality, and application of the principles used in the 1990 **OSHA Meatpacking Guidelines**. We incorporated their experience and advice in developing the proposal.

In addition, a number of the small business representatives who participated in the SBREFA process said they had already established ergonomic programs and practices based on the **OSHA Meatpacking Guidelines** without hiring consultants. The plain language format of the regulatory text and the availability of extensive compliance assistance materials should also help to ensure that employers, particularly small employers, will be able to set up their programs themselves.

Q24: Do you plan to provide any compliance assistance?

A24: Yes. The working draft as written provides the flexibility that employers need to fit solutions to specific problems in their workplaces. Much literature and technical expertise already exists and is available to employers, both through OSHA and a variety of other sources.

- Information is available on the [Ergonomics page](#) of this OSHA website. The Ergonomics page includes links to a variety of publications by OSHA, NIOSH and other sources.
- A variety of publications, informational materials and training courses are available from OSHA through Regional Offices, OSHA-sponsored educational centers, OSHA's state consultation programs for small businesses, and through the Web page.
- A wide range of publications on ergonomics are available from NIOSH at 1-800-35-NIOSH. NIOSH is also a "link" on the Ergonomics page of this website.
- OSHA's state consultation programs will provide free on-site consultation services to employers requesting help in implementing their ergonomics programs.
- OSHA is developing a series of compliance assistance materials and will make them available before a final standard becomes effective.

Q25: How would an OSHA ergonomics standard affect standards already enacted by States?

A25: Several States with OSHA-approved state plans have developed, or are working on, ergonomics standards. California has had a standard in place since July 1997; North Carolina and Washington have proposed standards. Once OSHA has promulgated a final ergonomics standard, all States with state plans will be expected to adopt the Federal rule or a standard that is "at least as effective" as the Federal rule within six months. Any State with a pre-existing standard may need to revise it to be "at least as effective" as the final Federal standard.

Q26: The proposal is in a different format from other OSHA standards. Why?

A26: The format of this proposal may seem quite different from other OSHA standards -- and it is. This proposal is a product of the Plain Language Initiative, the goal of which is to develop more "user friendly" regulations that are easy to read and use. Some of the significant changes include:

- **Question-and-Answer format.** OSHA tries to ask the questions most people would ask and in the order they would ask them, to help convey information more quickly.
- **Plain Language.** The draft was written using short, active sentences and sections using familiar words used regularly in conversation, such as "you" and "we."
- **"If-Then" Tables.** As much as possible, OSHA tries to display complex choices in tables and other side-by-side arrangements.
- **Two-Column Format.** The proposed Ergonomics Program Standard is the first document that the Federal Register has ever printed in a 2-column format, which makes the document easier to follow when being read.

Q27: Can you recommend sources for more information about setting up ergonomics programs?

A27: Following is only a small sample of good sources of information on ergonomics programs that can be accessed in the publications section of the Ergonomics page of this OSHA website:

- **Ergonomics Program Management Guidelines for Meatpacking Plants:** These guidelines, which OSHA published in 1990, which have been taken and adapted by employers in many industries. (It is also available from OSHA by calling (202) 693-1888.)
- **Elements of Ergonomics Programs: A Primer Based on Workplace Evaluations of Musculoskeletal Disorders:** NIOSH published this primer (DHHS-NIOSH Publication No. 97-117) in 1997. It is an excellent guide to ergonomics programs and provides many "tool box" examples for setting up an effective ergonomics program. (It also may be obtained from NIOSH by calling 1-800-35-NIOSH.)
- **Worker Protection: Private Sector Ergonomics Programs Yield Positive Results:** GAO published this report (GAO/HEHS-97-163) in 1997. It is a good source for information on what other companies, very small to large, are doing on ergonomics. (It also may be obtained by calling GAO at (202) 512-6000.)
- Many trade associations, unions and occupational safety and health organizations also have materials on ergonomics programs available. Several universities and many consultants offer training in ergonomics and ergonomics programs.

SMALL BUSINESS AND THE ERGONOMICS PROPOSAL

Q28: Will employees in small business be included in the proposed standard?

A28: OSHA estimates that about 1.3 million establishments with fewer than 20 workers have manufacturing and/or manual handling jobs so they will need to adopt a basic ergonomics program. The proposal requires employers with these jobs to have basic a program that includes: Management Commitment and Employee Participation, and Hazard Information and Reporting.

Q29: Does the proposal make any special provision for small businesses?

A29: Yes. The proposed rule incorporates several provisions that will assist small employers in complying with the standard:

- Exemption from recordkeeping requirements (10 or fewer employees).
- Long compliance phase-in:

- 2 years to do job hazard analysis
 - 3 years to implement permanent controls.
- Use of Quick Fix option instead of setting up full ergonomics program.
 - Control hazards with any combination of engineering, work practice and administrative controls, which should reduce control costs.
 - Work restriction protection period shortened to 6 months, compared to 18 months in, for example, the Lead and Cadmium standards.
 - Employers can discontinue their program in a job that has been fixed if no MSDs occur in that job for 3 years.

OSHA has developed a small business section on the Ergonomics page of this OSHA website. We will continue to develop both written and computer-based materials that will assist small business owners and their employees.

Q30: Will OSHA provide compliance assistance material for small businesses?

A30: OSHA has provided information for small employers on this OSHA website, and will continue to develop more.

PUBLIC PARTICIPATION PROCESS

Q31: How can I obtain copies of the proposal?

A31: Stakeholders can get a copy of the proposed rule, including the entire preamble, in several ways:

Electronically: Access the proposed rule and preamble on this OSHA website (www.osha-slc.gov/ergonomics-standard/).

Telephone: Get the proposed rule and preamble (hardcopy or CD-ROM) by calling OSHA's Publication Office at (202) 693-1888.

The full proposed ergonomics proposal, proposed rule and preamble, is approximately 400 pages as it appears in the Federal Register. The full proposal includes the proposed regulatory text, information on public participation (submitting comments and participating in informal public hearings), plus an additional 360 pages of supporting material, such as economic analysis, health effects and risk analysis. The full proposal is also available on CD-ROM. You can also obtain an abbreviated version of the proposal, which is approximately 40 pages, and includes a brief introduction, the regulatory text and information on public participation.

Q32: How can I submit written comments on the proposed rule?

A32: There are several ways in which stakeholders can submit comments on the proposed rule. All comments must be postmarked and/or transmitted to OSHA by February 1, 2000:

Mail: Send written comments, including materials such as studies and journal articles, to

OSHA Docket Office, Docket No. S-777
U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-2625
Washington, D.C. 20210.

Fax: Comments of 10 pages or less may be faxed to (202) 693-1648.

Electronic: Written comments may also be submitted via this OSHA website (www.osha-slc.gov/ergonomics-standard/). Studies and journal articles must be sent to the OSHA Docket Office, at the address above, because files cannot be attached to electronic submissions.

All written comments will be made a part of the public docket of this rulemaking. The public docket is available for inspection and copying from 10 a.m. to 4 p.m., Monday to Friday at the address above.

Q33: What is the schedule for informal public hearings on the proposed rule?

A33: An informal public hearing in Washington, D.C., and two regional hearings have been scheduled as follows:

Washington, D.C.: February 22 - March 17, 2000
Frances Perkins Building Auditorium
U.S. Department of Labor, 200 Constitution Ave., N.W.

Portland, OR: March 21 - 31, 2000
Benson Hotel
309 Southwest Broadway

Chicago, IL: April 11 - 21, 2000
James R. Thompson Center, State of Illinois Building
100 W. Randolph St.

At each location, the hearings will begin at 9:30 a.m. on the first day, and 8:30 a.m. on subsequent days.

Q34: What is the procedure for testifying at one of the hearings?

A34: Notice of Intention to Appear. Persons requesting more than 10 minutes to make their presentation and/or wanting to ask questions of OSHA and other witnesses, must file a notice of intention to appear at the hearings before Jan. 24, 2000. That notice must include the following information:

- Name, address, and telephone number of each person to appear.
- The hearing at which they want to testify.
- The capacity in which each person will appear.
- Approximate amount of time requested to make the presentation.
- Specific issues to be addressed.
- A brief synopsis of the position that will be taken on each issue.

- Whether any documentary evidence will be submitted for the hearing. If such evidence is submitted, a brief summary of the evidence is required.

Stakeholders can submit their notice of intention to appear in any one of the following ways:

Mail: You may send the notice of intention to appear to:

Ms. Veneta Chatmon, OSHA Office of Public Affairs, Docket S-777 U.S.
Department of Labor, 200 Constitution Ave., NW, Room N-3649
Washington, D.C. 20210.

Fax: You may also fax your notice to Ms. Chatmon at (202) 693-1634.

Electronic: You may submit your notice of intention to appear via this OSHA website (www.osha.gov).

Hearing testimony and documentary evidence. Stakeholders who are requesting more than 10 minutes to make their presentation or who intend to submit documentary evidence, must send their full hearing testimony and all evidence postmarked by Feb. 1, 2000, to Ms. Chatmon at the above address.

All notices of intention to appear, hearing testimony and documentary evidence will be available for inspection and copying at the OSHA Docket Office at the address above.

For additional information on the hearings, call (202) 693-2119.

Q35: Is it possible to obtain copies of exhibits that have been cited in the proposal?

A35: Yes. All exhibits cited in the proposed rule, including the complete Health Effects and Preliminary Economic Analysis, are in the public docket of this rulemaking (Docket No. S-777). They are available for inspection and copying from 10 a.m. to 4 p.m., Monday to Friday, at the OSHA Docket Office at the address above.

You can also request information from the public docket of this rulemaking as follows:

Mail: You may submit your request to the OSHA Docket Office at the address above.

Fax: You may submit your request via fax at (202) 693-1648.

Telephone: You may request exhibits from the public docket by calling the Docket Office at (202) 693-2350.

There is a 15-cent per page charge for all pages over the first 100 copied (no charge for the first 100 pages). OSHA Docket Office personnel will provide you cost and billing information once your request is received. The complete Health Effects and Preliminary Economic Analysis are also available on this OSHA website and on CD-ROM at no cost from the OSHA Docket Office.

Q36: How do I narrow my request for exhibits in the public docket of the proposed rule?

A36: You can contact the OSHA Docket Office to request a master exhibit list that identifies the contents of the full docket. After reviewing it, you can then submit your request to the OSHA Docket Office for specific documents by their exhibit numbers. Materials requested will be sent out within 10 working days.

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