



# Slingmakers

Issue No. 108

Winter 2005-2006



**WIRE & WIRE ROPE DIVISION**

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## Message from the President

December 22, 2005



Dear AWRF Members,

By the time you read this the holiday season will be behind us but I wish that everyone had a joyous and safe holiday.

At this time of year the Board of Directors are very busy with Association work. All of the committee chairpersons are preparing their plan of action for 2006 and their respective budget requests. Our upcoming Board of Directors meeting will be held in Key West, Florida on January 20th and 21st. This is the most important meeting of the year as we discuss and approve each committee's plans and budgets for the year as well as set in motion the general plan for the Association.

As most of you are aware the Directors and Officers serve the Association without compensation. It is strictly volunteer work. They even pay their own expenses to attend the four Directors meetings held each year. It is this type of volunteerism that has made our Association such a success for nearly 30 years! Speaking of 30 years, our fall meeting this year will mark our 30th year anniversary. As I mentioned in the last issue of Slingmakers, we will be publishing the "30 Year History of the Associated Wire Rope Fabricators". If any of you have significant pictures or other relevant contributions please send them to the AWRF office and we will try and incorporate them in the publication.

It is also the time of year to get your dues paid. The dues that are collected are the lifeblood of the Association. Dues amount to approximately 85% of our income for the year. Advertising in Slingmakers and whatever excess is generated from our general meetings make up the balance of our operating income. I ask that each of you take a moment to make sure your company is paying the appropriate dues for your company's

annual sales. Our dues collection is strictly on an honor system and since it is so important to the Association I felt that a reminder wouldn't hurt. Also, the timely payment of your dues is appreciated as well.

For the past few years our membership level has hovered around 300 members (not including branch members). The Board feels that there are more companies out there that would benefit from membership in the Association but they are hard to ferret out. Because of this I ask that if you aware of companies that would make good members please let Andrew Hall of Southern Wire, our Membership Committee Chairperson, Jeff Gilbert or myself know who they are. We will aggressively seek their application to join the Association.

Our Boston general meeting was a great success. I hope that you mark your calendars for our spring meeting which is being held in sunny, warm, St. Petersburg, Florida, April 23rd through the 26th. For those members that do not regularly attend the Association's general meetings, I think this one will be especially informative. Paul Boeckman of The Crosby Group, our Program Committee Chairperson and Jeff Gilbert are putting the finishing touches on what I believe will be a great program of presentations. It should have just the right combination of technical and useful business presentations.

If I can be of service to any of you at any time please feel free to contact me. In this day and age of electronic communication, e-mail seems to be the method of choice so here's my address, mike@loosco.com .

I look forward to seeing as many of you as possible in April or sooner!

Sincerely,

Michael M. Wallace  
President AWRF

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# Boston P.I.E. Exhibitors September, 2005





## Liaison to OIPEEC

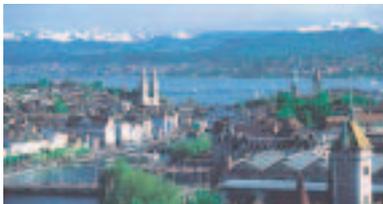
(International Organization for the Study of the Endurance of Ropes)

By: Knut Buschmann, President of Uniroppe Ltd.



AWRF maintains an active dialog with many other trade associations locally here in North America but also from around the world. As a member of the OIPEEC Management Board I also take care of the official AWRF Liaison duties during their meetings; that is I represent your organization within OIPEEC.

Contrasting to what many believe, OIPEEC is not an exclusive 'European' Organization. It has members from 24 different countries of which members from



USA/Canada make up the second largest group.

On November 18, 2005 OIPEEC had a Board of Directors

Meeting in Zurich, held at the Technical University ETH which I attended; and here is my report.

Much these days revolves around the future of the OIPEEC Organization. One has to know that OIPEEC originally was set up to coordinate wire rope studies between Universities and Research Institutes and/or gave impulse in which direction studies on the endurance of wire rope ought to be done. Today, most research funds for universities around the world have been eliminated or just simply faded away when their professors retired; Costello at UofIll, Campaign, IN or Prof. Oplatka at the EHT in Zurich are just two examples. OIPEEC is not an organization which is conducting research itself but to give guidance and recommendations as to the direction of experimental studies. Today, universities and laboratories no more do such studies without a direct financial compensation, mainly provided by the private sector. That also implies that the results are not, as in the past, public domain but their dissemination is governed by private interest as well. Regretfully, this largely marks the end of public funded scientific studies on the subject of wire rope endurance.

Some universities have adopted better than others,

while many have completely disbanded the subject of wire rope studies. One university which has managed to continue with studies is the University of Stuttgart (Germany) however, their programs are largely funded by individual wire rope- and equipment manufacturers.

About every two years OIPEEC organizes a conference on the subject of wire rope. The last conference in 2003 was about 'Experiences with Wire Rope' while the next upcoming conference's theme is "TRENDS FOR ROPES, Design, Application, Operation".

This conference will be held in Athens, March 27-29th 2006. There will be a total of 25 different presentations on wire rope. Each presenter has about 20 minutes plus 5 minutes for Q&A. These conferences are quite different from our AWRF one's as the presentations are one after the other for 2 straight days, morning AND afternoon however, with a generous 90 minute lunch break. This is 'serious' stuff and separates the man from the boys in our industry. If you are serious about wire rope YOU decide which group you want to belong to.

Information and registration details can be obtained from their website [www.oipeec.org](http://www.oipeec.org)

Here are some of the presentation titles:

- : Lightweight Ropes for Lifting Applications
- : Synthetic Fiber Ropes for Mine Winding
- : The breaking Load of 19x7 ropes ...
- : Designing Wire Rope - Data collected

Hey - there is an upside to all of this. If you have never been to Athens ... here is your chance !



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- U.S. economic growth has moderated some, but activity in the wire-rope related sectors continues high.
- Economic growth has spread around the globe. Will it continue?

**U.S. Economic Situation**

The U.S. economy continues to experience solid growth. Despite spikes in oil and gas prices and shocks from the hurricanes that hit the Gulf Coast, the resilient economy still grew 3.7% from third quarter of 2004 to the same period in 2005. Current economic trends are expected to persist through at least the first half of 2006, boosted by hurricane reconstruction efforts in the Gulf Coast region. Downside potential risks for both businesses and consumers include still-high energy costs and rising interest rates.

Consumer spending remains quite strong. Outside the Gulf Coast, employment is growing steadily, helping to boost household incomes. Sales of consumer electronics are booming. Nonetheless, some consumers are going to be a bit cautious this winter, as they face much higher home heating bills. Light vehicle sales weakened in late 2005. Domestic manufacturers and some foreign producers closed out the 2005 model year with huge buyer incentives, but retail dealers' sales plunged afterwards. Vehicle production rates have risen to restore dealer stocks despite slow sales.

2005 proved to be another good year for the real estate industry. Housing starts remain high, reflecting strong demand for housing. The hot market should cool as construction costs and mortgage loan rates rise. Meanwhile, nonresidential construction is growing at a moderate pace, though construction material prices remain relatively high. Government construction is growing as well, especially state and local government infrastructure projects and educational facilities. Construction activity will increase even more in 2006 due to hurricane reconstruction in the Gulf Coast.

Corporate profits and cash flows have increased in 2005, reflecting higher sales combined with the maintenance of strict cost controls. Businesses have been investing primarily to upgrade equipment and to enhance productivity. Spending for information processing equipment and software remains strong, and demand for other types of equipment has improved as well. In particular, sales of oilfield equipment, construction machinery, heavy trucks and railcars have all increased. Though temporarily depressed by Gulf Coast outages, oil and natural gas drilling also has increased significantly the last few years.

U.S. imports of foreign-made goods and services have increased, swelling the goods trade deficit to \$698 billion during the third quarter of 2005. U.S. exports have increased as well, especially industrial supplies (plastic resins, chemicals, metals, etc.) and aircraft, parts and engines. Growth in manufacturing and trade production and sales slowed in 2005, as most manufacturers worked to control inventories. This slowdown was also reflected in the Transportation Services Index (TCI\*) for freight, which posted a reading of 112 during the third quarter of 2005, a modest 1.3% increase from the same period last year. Manufacturing production, sales and freight transportation all should improve a bit in 2006 as firms replenish and update inventories to meet higher sales.

\* Transportation Services Index (TCI) measures the month-to-month changes in services provided by the for-hire transportation industries, including railroad, air, truck, inland waterways, and pipeline.

**Table 1  
FACTORS INFLUENCING WIRE ROPE DEMAND\***

|                                | 2003  | 2004  | Latest 2005 |
|--------------------------------|-------|-------|-------------|
| Real GDP Growth                | 2.7   | 4.2   | 3.7         |
| Manufacturing Production       | 0.7   | 5.0   | 4.1         |
| Manufacturing & Trade Sales    | 2.0   | 6.0   | 3.2         |
| Goods Trade Deficit (\$2000)   | 589.5 | 669.1 | 698.0       |
| Vehicle Sales (Mils, SAAR)     |       |       |             |
| --Cars (Domestic)              | 5.5   | 5.3   | 5.5         |
| --Light Trucks (Domestic)      | 7.8   | 8.1   | 6.2         |
| --Medium/Heavy Trucks          | 0.3   | 0.4   | 0.5         |
| Construction:                  |       |       |             |
| --Housing Starts (Mils)        | 1.85  | 1.95  | 2.12        |
| --Private Nonresid Bldgs       | -5.1  | 4.2   | 3.5         |
| --Gov't Bldgs & Inf' structure | 2.9   | 2.6   | 11.7        |
| Bus. Equipment Spending        |       |       |             |
| --High Tech & Software         | 5.1   | 13.6  | 14.0        |
| --Other Machinery              | 1.4   | 10.1  | 7.4         |
| Freight Transportat'n Index    | 2.6   | 5.9   | 1.3         |
| Oil & Gas Rigs Running         | 1,032 | 1,192 | 1,486       |

\*Percent change from previous year unless otherwise noted.

## GLOBAL ECONOMIC FORECAST

The global economy continues to operate at a brisk pace in 2005, though somewhat slower than 2004. The U.S. and China are still the primary locomotives of growth in the world, but other nations are expanding as well. Our forecast for global economic growth in 2006, at 4.3%, is the same as 2005's pace, but there are some important differences.

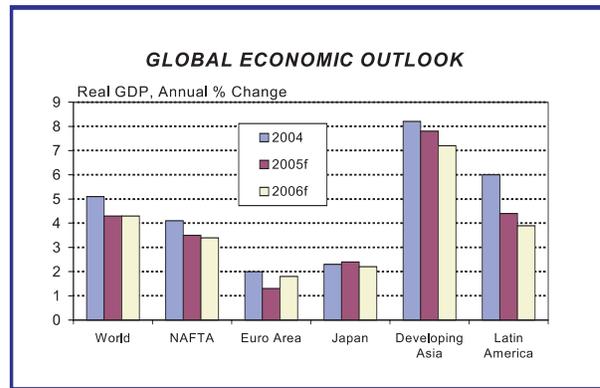
- Energy prices are much higher today than they were a year ago. Adjusting to the current levels created problems for some oil-importing nations in 2005. However, energy producers around the world plan to spend much more in 2006 on exploration, drilling, and expanded production of oil and natural gas.
- Interest rates also have increased, serving to dampen activity in credit sensitive sectors of the economy. Still, changes in rates affect the economy with a lag; so much of the impact will likely occur in 2006.
- Brisk growth in foreign trade, business investment and higher consumer spending (especially outside the U.S.) should make up for the shortfalls caused by higher interest rates.

The U.S. economy slowed during 2005, moving from 4.2% in 2004 to 3.6%. As expected, the worst problems were centered in the automotive industry. But the much anticipated slowdown in housing-related markets was a no-show, though it's still expected to appear in 2006. On the upside, U.S. exports will accelerate—reflecting faster growth in the economies of its trading partners—business investment in plant and equipment will stay strong, and government spending is set to increase. Overall, the U.S. economy will grow about as fast during 2006 as it did in 2005.

China's economy continues to surge ahead at a rapid 9%-plus pace. The consensus forecast is for growth to slow to the 8%-plus range in 2006. Don't count on it. Government spending to correct the nation's chronic shortfalls in infrastructure capacity will remain high. Foreign direct investment also will continue strong, as firms from other nations move more manufacturing operations to low-cost China. Further, personal incomes are rising rapidly in many parts of China. Foreign and Chinese firms both are increasingly targeting the domestic market.

What about the rest of the world? The regional picture is mixed but generally healthy:

The Japanese economy is growing again. GDP will increase by more than 2% in 2004 through 2006, the best three-year performance since 1995-97. Exports were the primary driver. Now, consumer and business



confidence is on the rise. Increased private demand will help offset a slowdown in government spending.

The Euro Area has been a notable laggard during this economic expansion. Unemployment rates are chronically high, and consumer spending is growing moderately at best. Private business investment is declining, and big budget deficits crimp government spending. That has left only exports to support the region's economy. However, domestic demand (of private firms and citizens) is expected to improve in 2006, though Euro Area growth will remain under 2%.

In the developing world, Asian economic growth will continue rapid, boosted by exports, consumer spending and business investment. Commodity-exporting nations in South America should continue to prosper, Chile, Brazil, and Mexico in particular.

NOTE: this forecast implies that overall steel demand will increase in 2006. While housing and automotive production (outside Asia) will be weaker, nonresidential and infrastructure construction will be strong, especially in China and the U.S. Just as important, distributors' inventories of most steel products are at very low levels and will need to be replenished.

Steel production will rise to meet the increase in demand, which should keep most product prices in check. However, steel input costs—scrap, iron ore, natural gas and metallurgical coal—will remain near the present high levels. Steel price fundamentals for 2006 seem more balanced than they were in 2005, when pricing momentum was mostly downward. Any price changes that do occur should be relatively small.

This material was prepared by the Los Angeles Economic Development Corporation:

Nancy D. Sidhu  
Vice President & Senior Economist

Candice Flor  
Research Project Manager

## AWRF SCHOLARSHIP WINNERS – 2005

### Larry Boekel Memorial Scholarship



1. Jamie DeSalle Sievering  
Sponsor: Wire Rope Corporation of America



2. Adam Wesley Coe  
Sponsor: Columbus McKinnon Corp.



3. Mark Robert Wolke  
Sponsor: F&M Mafco, Inc.



4. Sarah Jeanne Holly  
Sponsor: Pacific Industrial Supply



5. Kelly Ann Stapleto  
Sponsor: I&I Sling Inc.

## TECHNICAL COMMITTEE

The Wire Rope Technical Board has completed the changes and updates for the Fourth Edition of The Wire Rope Users Manual. The Board saw the need for the update and just completed an exhaustive review with many additions and deletions of out of date information. There is a new section on wire rope inspection of high performance and plastic enhanced ropes and updated information on categories of Rotation Resistant rope and the new design factors. The new manual will be available in mid December. All members of AWRF will be getting a copy, compliments of the Association. The WRTB also advises that the new information on inspection will soon be available as a 12 page stand alone brochure. This should be available sometime after January.

All WRTB publications are available through a link on the Domestic Wire Rope Manufacturers website at [www.domesticwirerope.com](http://www.domesticwirerope.com). Please note that the list prices have changed.

## NEWS ABOUT MEMBERS

### Robert Wright "Bob" Birstow, Sr. – 7/10/15 – 12/13/05

Bob founded Birstow Distributing Company in 1960 which later became Birstow Lifting Products Company and today ships rigging products worldwide and is operated by his two sons. He was an active member of AWRF since 1976 and a respected leader in the industry. His greatest love was his large family. He was preceded in death by his daughter Rosina Seydel. Bob is survived by his loving wife of 64 years, Rosina Hourigan Birstow, his children Betsy, Lael, Robert Jr., and Andrew, nine grandchildren with spouses and nine great-grandchildren. AWRF expresses deep sympathy to the family of such an accomplished man.



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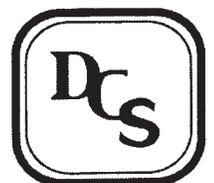
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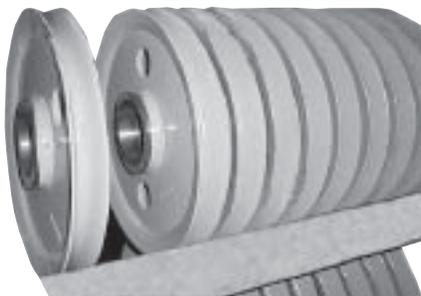
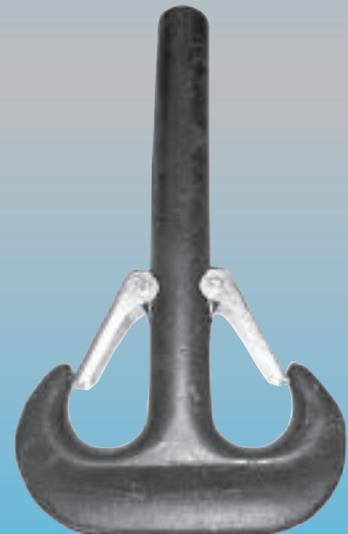


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## Your Safety Committee At Work

“You might be a safety guy IF...you sit backwards on the Disneyland rides to see how they do the special effects. You might be a safety guy IF...you can type 70 words per minute but cannot read your own handwriting. You might be a safety guy IF...you have saved every power cord from all of your broken appliances.”

Well, this is enough humor. The sobering fact is that Safety is extremely important in the workplace and worker injuries hit our bottom-line, hard. The top-ten workplace injuries according to the Liberty Mutual Workplace Safety Index, were:

- |                              |                                    |
|------------------------------|------------------------------------|
| 1. Overexertion-26.4%        | 6. Repetitive Motion-5.9%          |
| 2. Falls on same level-13.7% | 7. Highway Incidents-5.8%          |
| 3. Bodily Reaction-10.2%     | 8. Struck against Object-4.4%      |
| 4. Falls to Lower Level-9.0% | 9. Caught in or Compressed by-3.9% |
| 5. Struck by Object-8.5%     | 10. Assaults & Violent Acts-.8%    |
- All other-11.3 %

We can improve these rates, therefore decreasing the loss to our business and improve our work environment. One of the important steps to take in doing so is to practice thorough accident/incident investigation. The definition according to The National Safety Council defines an accident as an undesired event that results in personal injury or property damage. An incident is an unplanned, undesired event that adversely affects the completion of a task. A near miss describe incidents where no property was damaged and no personal injury sustained, but where, given a slight shift in time or position, damage and/or injury easily could have occurred. All incidents need investigating, whether they are a near miss or an actual injury-related event. Near miss reporting and investigation allow you to identify and control hazards before they cause a more serious incident. The objective is to identify root causes, not to primarily set blame. Recommended preventive actions should make it very difficult, if not impossible, for the incident to recur. The result will be reduced workplace injuries.

The following will serve as an update of the programs as promised in the previous Slingmakers issue. The Safety Procedures for Chain Slings is complete and is scheduled to be presented to the Technical Committee in February. The technical sub-committee will start the re-write on Practices and Guidelines for the Operation of Test Machines after the first of the year. We are in the first stages of review for all other programs. We want to thank each person for the emails received and volunteering to assist the Safety Committee. Please continue to email any suggestions to [teresa@newelldavis.com](mailto:teresa@newelldavis.com) .

Do not forget to participate in our upcoming AWRP Safety Awards Program. We will mail the applications by the end of March 2006 or you may download the application from AWRP website ([www.awrf.org](http://www.awrf.org)) . The paperwork is simple and it is a wonderful method to reward Safety with your employees.

Use every method and take every opportunity to make your workplace a safer place.  
Celebrate Safety!

Teresa McGee  
AWRF Safety Committee Chairman

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## 30th Anniversary Celebration in October 2006

An Ad Hoc Committee appointed by President Mike Wallace will be planning a program to commemorate the first thirty years of Associated Wire Rope Fabricators activities. The committee consists of two AWRP Past Presidents: Dick Miller (Marcal Rope & Rigging, Alton, IL), and David Bishop (Bishop Lifting Products, Houston, TX) along with Don Sayenga, (Life Member, Tucson, AZ). Miller and Bishop were attendees at the original organizational meeting in December 1975 that led to incorporation of AWRF. Both have brought a son into the industry that has served as a second-generation director.

The committee has begun its work documenting the numerous significant achievements of AWRF in the first three decades of its existence. A presentation to the membership will be part of the Fall meeting in San Antonio, TX.



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# GOVERNMENT AFFAIRS COMMITTEE REPORT

By  
J. Barry Epperson,  
General Counsel and Chairman,  
Government Affairs Committee



During the year 2005, the Government Affairs Committee has provided regular reports to the Board of Directors and general membership detailing the progress of AWRF legislative and administrative initiatives on a state, federal and international scale. Principal challenges facing AWRF involved the OSHA sling safety standard and swager guarding policies, health care plans for association members, civil justice reform as well as various antitrust decisions from the EC, Canada and the U.S.

In keeping with standard GAC practices, the special needs and concerns of the lifting, rigging and load securement industry have been communicated to the appropriate authorities by means of liaison with members of Congress and/or their staff representatives. Administrative branch contacts at the Department of Labor, OMB, the Small Business Administration and the Federal Trade Commission have also been maintained. To the extent possible, accommodation has been made to our non-U.S. based members – particularly those doing business in North America. The effectiveness of this effort has been demonstrated in the form of GAC participation by two Canadian members indicating proportionate representation.

The Government Affairs Committee has delivered the message of this industry both personally and through participation in coalitions having similar interests. Among those organizations in which AWRF has enjoyed participation are the Lawsuit for Abuse Reform Coalition, the American Tort Reform Association, the American League of Lobbyists, the American Society of Association Executives (as a past member of the Legal Advisory Council) and the U.S. Chamber of Commerce. As a bonus of association membership, a website link to the Chamber's government relations data bank has been provided. The GAC has conducted five Government Affairs committee seminars in Washington, D.C. A sixth will be scheduled for the fall of 2006, at the Chamber offices. Additionally, the Government Affairs Committee has maintained connections with the National Federation of Independent Business, the National Association of Manufacturers, the Specialized Carriers and Rigging Association and numerous other nonprofit groups sharing similar goals.

Largely due to the facilitating cooperation of the U.S. Chamber, a breakthrough has been accomplished regarding needed changes to the obsolete and unsafe OSHA Sling Standard. By achieving the Agency's short list of standards revisions, the process of revision has now begun with the submission of revised OSHA guidance rules to the B30.9 subcommittee of ASME where several AWRF members enjoy membership.

Having participated in OSHA's initial ergonomics standards meeting in Washington, D.C., the Government Affairs Committee has continued the Association's vigil as members of the National Coalition on Ergonomics.

The war on terrorism weighs heavily on the Administration's domestic agenda. Nevertheless, neither presidential veto nor an unbalanced Congress stands in the way of federal medical and products liability reform. It is our hope that the lobbying efforts of AWRF and its partners in industry will continue to press until real tort reform supplants the current uncertainty in our legal system. Previously reported, there have been tort reform gains in twenty states with few reversals in others. A federal class action reform bill became law last spring. It is expected that additional civil justice reform measures will be linked to heightened national security in the U.S. In addition, we are counting on more vitally needed fiscal incentives next year to the economy. For example, the House of Representatives has recently passed the AWRF-lobbied Lawsuit Abuse Reform Act; new Associations' Health Care Plan legislation is on the table and numerous OSHA reform bills are working their way through Congress.

The GAC continues to monitor judicial transformations at both the state and federal levels. The prospects for a business friendly U.S. Supreme Court are favorable.

Recognition of AWRF as the leading entity for the lifting, rigging and load securement industry is another issue of maintenance. Accordingly, we have intensified our lobbying efforts with the U.S. Department of Commerce in general and the Bureau of the Census in particular for a unified, integrated codification in the North American Industrial Code. It is expected that additional tort reform measures will be linked to national security.

The lifting, rigging and load securement industry has much at stake in Washington, D.C. As its eyes, ears and legs in this arena, the Government Affairs Committee must intensify its efforts in 2006 to respond to the expectations and needs of our membership. Because of the new Congressional demography, a proactive approach is called for in the legislative, administrative and judicial theaters during the second half of the 109th Congress. But nothing can be taken for granted because without sixty votes to count on any of our causes can be filibustered to early graves. Accordingly, our mission requires continued participation in Washington based coalitions as well as the pursuit of ever-changing individual contacts, in order to insure wins in vital areas. To fulfill the purposes set forth in the Association Articles and By-Laws, this Committee has a mandate to represent the membership by advocating the objectives of the lifting, rigging and load securement industry in such a manner that we will be recognized and not just heard. A strong Government Affairs Committee is needed to accomplish this mission which requires the continued support of the Association membership.

During the Second Session of the 109th Congress, the Government Affairs Committee will allocate its time and resources between monitoring, information gathering, reporting and lobbying. We will continue to fine tune our priorities in light of the wartime diversions around the world. Accordingly, the new agenda for the lifting, rigging and load securement industry will be sufficiently flexible to accommodate a legislative and administrative environment which is likely to turn its attention to our issues on short notice. For example, President Bush remains committed to further tort reform measures.

As always, within all feasible parameters of opportunity, the GAC proposes to pursue regulatory, judicial and legislative reforms of significance to AWRF members. While the Committee's strategic plan addresses issues at the state, federal and international levels, selective tactical initiatives will once again target specific issues relevant to our industry. These are listed below under the heading "Agenda." Where circumstances call for collective influence, the GAC will continue to participate in coalitions, joining representatives from other organizations with similar objectives. There is no doubt that our membership on the advisory council of the U.S. Chamber of Commerce has resulted in a considerable elevation in status insofar as our influence on Capitol Hill is concerned. While the proposed year 2006 GAC budget gives the Committee the necessary latitude to maintain current sources of information while at the same time developing new contacts, pursuing issues and lobbying where necessary, this amount nevertheless constitutes a minimum allowance to accomplish our Association's goals.

Through the GAC, AWRF will continue to maintain its own oversight initiative with respect to regulations and laws affecting its status as a non-profit corporation. Antitrust regulations adopted by government agencies in Canada and the EC, as well as applicable federal and state judicial decisions, will continue to be focal points of review. Where opportunities for action present themselves, the GAC will react accordingly. Tort and product liability reform at all levels of government will be given the highest priority. State court decisions and state legislative actions (often in conflict) are where bench, bar and the public take sides on the battleground. It is on this terrain that plaintiffs' lawyers compete against business interests. Accordingly, the GAC must continue to concentrate on these objectives through membership in various non-profit associations and coalitions as well as via its own state networking system. Of course, the international interests of our members are always a part of our strategic agenda.

Efforts to expand commercial opportunities in the European Community as a result of the trend toward internationalism and the weakening dollar present the lifting, rigging and load securement industry with both familiar and unfamiliar obstacles in the form of international standards, practices, procedures and ethics. These entanglements have been exacerbated by the continued threat of global terrorism. EC and ISO standards can no longer be relegated to a position of secondary importance, nor can this Association ignore the effects of emerging Pacific Rim influences. The GAC proposes to approach this situation with broadened sensitivities to the needs of members who compete in these marketplaces. Continued emphasis upon public recognition of the Association's role as the leading spokesman for the lifting, rigging and load securement industry remains a fundamental objective of the GAC. Commercial self determination takes on even greater significance as AWRF membership expands geographically as well as in terms of membership numbers and, of course, the fortunes of war and sometimes the luck of the draw.

### **1. PRODUCT LIABILITY REFORM**

AWRF members live and work in fear of frivolous and unfounded product liability lawsuits. The problem is critical for manufacturers and fabricators who should be investing research and development, but instead, are forced to budget excessive amounts of money on legal fees. In this litigious climate, business owners must consider liability as an aspect of every decision. Businesses can be held liable for injuries which are not in any way connected with the quality or reliability of their products. Proposed legislation would insure a uniform system with fewer opportunities for abuse. In 2005, class-action reform legislation became the law of the land. Attacking the current lawsuit abuse mania on a piecemeal basis continues to be a more acceptable solution than sweeping remedial legislation. A business-friendly Congress will help, but sixty votes are needed in the Senate to control the issues.

### **2. ECONOMIC STIMULUS, SPENDING AND TAX RELIEF**

Today, AWRF members are experiencing moderate interest rates on lines of credit and a more bullish equities market, while simultaneously undergoing employment vagaries in the marketplace. Governments around the world are reacting with "stimulus" measures about which there is considerable disagreement among professional and amateur economists alike. Are we to have more government spending and/or tax incentives? The solutions adopted will undoubtedly have a significant impact upon the lifting, rigging and load securement industry. Accordingly, AWRF must rely on its government relations arm to exercise the appropriate influence in the U.S. Congress and elsewhere to meet these enormous challenges with reason and without jeopardy to the industry.

### **3. ERGONOMICS**

The U.S. Secretary of Labor, Elaine L. Chao, has announced the parameters of a new voluntary ergonomics rule. If the standard is to be fair to workers and employers alike, the latter must have the flexibility in determining the most cost-effective methods of identifying and treating employees with work related cumulative trauma disorder (CTD's). We must insist upon scientifically generated cause and effect relationships. By adopting a rule requiring the treatment of any possible CTD, a false standard of cause will be established in tort actions. Moreover, by mandating the employers use unproven technologies and practices (there is no consensus in the medical community) the incidence of CTDs is likely to increase and OSHA inspectors will be inclined to issue erroneous, subjective citations. The GAC must continue its vigil to insure that the new voluntary standard remains voluntary. Acceptance must be driven with such good ideas that employers will logically adopt them and, of course, any new rule must apply to the particular industry for which it has been generated. A "one size fits all programmatic approach" should be out of the question.

### **4. HEALTH CARE**

Proposed legislation would provide many AWRF businesses the opportunity to secure affordable health insurance programs for

themselves and their workers. As medical costs skyrocket out of all proportion, we propose to focus on the opportunity for our smaller members to enjoy parity with labor unions and large employers in the health care arena. By working for the adoption of such legislation, we can hope to achieve such parity.

### **5. SLING SAFETY STANDARD**

Considerable progress has been made in our effort to encourage OSHA to synchronize the U.S. Department of Labor Standard with the ASME B30.9 Standard. Culminating with recent Congressional testimony by Howard Will of the Caldwell Group, the AWRF epic lobbying effort has finally paid off. Now, only the fine tuning remains to be completed by the ASME B30 Committee and the AWRF Technical Committee.

### **6. SWAGER GUARDING ISSUES**

AWRF must continue to demonstrate to OSHA the differences between "power presses" and "swagers." By developing a definition of each term accompanied by enumerated differentiating characteristics, the distinction between the two types of machines and the corresponding safety issues can be underscored. Members should be reminded to think and speak in such terms. To assist AWRF members threatened by OSHA citations for alleged swager barrier guarding violations, information packets are available at the Association office. In addition, the GAC has embarked on a program to convince OSHA to grant a national barrier guarding variance for swaging machinery.

### **7. WASHINGTON, D.C., GOVERNMENT AFFAIRS BRIEFING**

The Sixth Annual Government Relations Symposium will be held in the fall of 2006 at the U.S. Chamber of Commerce. All AWRF members are invited.

### **8. REGULATORY REFORM**

The GAC maintains a close watch for proposed regulations affecting the lifting, rigging and load securement industry. Care must be exercised to make certain that rules are not adopted without true scientific bases and a balance between risk assessment and cost benefit analysis.

### **9. NAIC CODE**

The Government Affairs Committee has submitted a white paper to the U.S. Bureau of Census in support of a new integrated NAIC code for the lifting, rigging and load securement industry.

### **10. CONVENTION SPEAKERS**

The Government Affairs Committee will continue to facilitate the availability of professional speakers for the coming year. By virtue of our upgraded membership at the U.S. Chamber of Commerce, we shall continue to tap their valuable resource bank of speakers for AWRF general conventions.

### **11. JUDICIAL APPOINTMENTS**

AWRF takes a keen interest in judicial nominations where there is often a philosophical conflict between interpretation of the law as opposed to judicial activism.

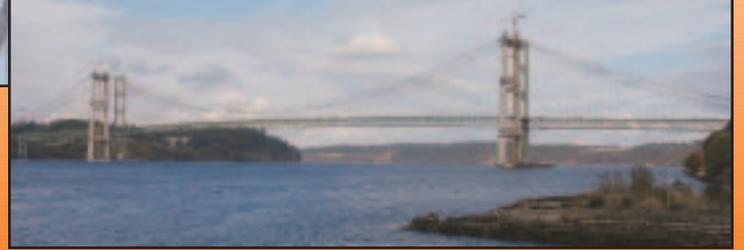
### **12. GOVERNMENT AFFAIRS COMMITTEE MEMBERSHIP**

For 2006, the AWRF GAC will be composed of Barry Epperson (chairman), Jim Fletcher (American Sling Company, Inc.), Mike Hughes (Wire Rope Corporation of America), Alex Edwards (Paducah Rigging, Inc.), Gary O'Rourke (Strider-Resources), Don Pellow (Pellow Engineering Services), Dennis St. Germain (I & I Sling Company), Knut Buschmann (Unirope Limited), Mike Gelsky (Lift-It Manufacturing Co.), Tom Miller (Marcal Rope & Rigging), Jeff Gilbert (AWRF) and Ron Raymond (J.C. Renfroe & Sons). Two of our Canadian members (each a past president) continue their contributions to the GAC. All AWRF members share a role in our government relations program. Please contact Barry Epperson at (918) 585-5641 (jbarry@aol.com) if you wish to join the Government Affairs Committee.

By exercising our rights of participation, AWRF will continue to play an important role in the political process during the second session of the 109th Congress.

# CONSTRUCTION PICTURES OF THE NEW TACOMA NARROWS BRIDGE

By Hugh Hillesland, ALP Industries, Inc.



## INSURANCE & LEGAL RESOURCES COMMITTEE THE EMPLOYER'S ADVISORY

A QUARTERLY NEWSLETTER  
HIGHLIGHTING CURRENT EMPLOYMENT LAW ISSUES  
PREPARED BY ATTORNEYS BETTY BECHTEL AND MICHAEL SANTO



Jim Boyko

4th Quarter

BECHTEL & SANTO, L.L.P.

2005

### NOW ACCEPTING APPLICATIONS FROM CUBS FANS

With the end of the baseball season, Cubs fans are left to spend another disappointing winter with the realization that their team will continue its near 100-year drought with no championship. But even if their disappointment matures into major depression and paranoia, a recent case from the 7th Circuit prevents potential employers from testing their sanity when seeking employment.

In order to secure a promotion from Rent-A-Center ("RAC"), its employees were required to take a 502-question personality test from the Minnesota Multiphasic Personality Inventory (MMPI). RAC claimed that the test was designed to measure personality traits. But the test did more than measure whether someone works well in groups or is comfortable in a fast-paced office. The test also measured such traits as depression, hypochondriasis, hysteria, paranoia, and mania. In fact, elevated scores on certain scales could be used in diagnoses of certain psychiatric disorders. And an employee could be denied any chance for advancement simply because of his or her score on the test. Some true/false questions on the test included:

"I see things or animals or people around me that others do not see."

"I commonly hear voices without knowing where they are coming from."

"At times I have fits of laughing and crying that I cannot control."

"My soul sometimes leaves my body."

"I have a habit of counting things that are not important such as bulbs on electric signs, and so forth."

Most of us would agree that answering "true" to these questions could identify the applicant as depressed, paranoid, or a Cubs fan.

Two employees who scored poorly on the test sued RAC, claiming that the test was a "medical exam," and its use violated the Americans with Disabilities Act. The Act has three provisions which explicitly limit the ability of employers to use "medical examinations and inquiries" as a condition of employment: a prohibition against using pre-employment medical tests; a prohibition against the use of medical tests that lack job-relatedness and business necessity; and a prohibition against the use of tests that screen out people with disabilities.

The ADA defines a medical examination as "a procedure or test that seeks information about an individual's physical or mental impairment or health." According to the EEOC, other factors to consider in determining whether a particular test is a medical examination include: whether the test is administered by a health care professional, whether the test is interpreted by a health care professional, whether the test is designed to reveal an impairment, and whether the test is invasive. Psychological tests that are designed to identify a mental disorder or impairment qualify as a medical examination, but tests that measure personality traits, such as honesty, personal preferences, and habits, do not. Therefore, the case largely turned on whether the test was designed to reveal a medical impairment.

RAC argued that, as used, the test only measured personality traits: "The test does not test whether an applicant is clinically depressed, only the extent to which the test subject is experiencing the kinds of feelings of depression that everyone feels from time to time." RAC also argued that simply because an employee scored particularly high on certain sections of the test did not necessarily mean that the person had "a paranoid personality disorder."

The Court, though, determined that "it seems likely that a person who does, in fact, have a paranoid personality disorder, and is therefore protected under the ADA, would register a high score. And that high score

could end up costing the applicant any chance of a promotion.” (Even though the employees were already working for the company, the test was treated as a pre-hire exam because it was used to weed out applicants for a new position.) Accordingly, “because [the test was] designed, at least in part, to reveal mental illness and has the effect of hurting the employment prospect of one with a mental disability, the test ... is best categorized as a medical examination, ... [which] violated the ADA.” *Karraker v. Rent-A -Center, Inc.*, 411 F.3d 831 (C.A.7 (Ill.), 2005).

**Practical Tip:** The Court noted that RAG could have also argued that even if the MMPI is a medical exam, it is ‘job-related and consistent with business necessity.’ By prevailing on the latter, RAG could have claimed that the test is permissible during employment, even if impermissible pre-offer. But RAG did not make this argument. It sought a clear finding that the MMPI is not a medical examination and thus not regulated at all by the ADA. It lost. If your company uses a personality test like the MMPI, do not administer it until after an offer of employment/new position has been made to the applicant or candidate for promotion. And be prepared, if challenged, to prove that the test is job-related and consistent with business necessity.

## ANTI-UNION POLICY DOOMS EMPLOYER

Brandies Machinery & Supply Company sells and services heavy construction and mining equipment throughout the mid-west. The Company is non-union and explains its approach to employee relations at length in its employee handbook:

We, as a Company, prefer to deal with people directly rather than through a third-party. This is a non-union organization. It always has been and it is certainly our desire that it always will be that way.

You have the right to join and belong to a union and you have an equal right NOT to join and belong to a union. If any other employee should interfere or try to coerce you into signing a union authorization card, please report it to your supervisor and we will see that the harassment is stopped immediately.

Based on this handbook policy, and other activity at Brandies, the Union filed a petition with the National Labor Relations Board (NLRB) claiming that Brandies violated the National Labor Relations Act (NLRA), which protects employees’ union activities, by promulgating a written policy that encourages employees to report to management any employees who solicit support for a union. The union further claimed that Brandies’ policy interfered with and restrained employee in organizing collectively.

One of the rights under the NLRA is the right to solicit on behalf of a union organizing campaign. In fact, proponents of unions may “engage in persistent union solicitation even when it annoys or disturbs employees who are being solicited.” According to the NLRB, employers interfere with this right, and violate the Act, when they invite their employees to report instances of fellow employees bothering, pressuring, abusing, or harassing them with union solicitation, and imply that such conduct will be punished.

The Court determined that the above-language in the handbook violated the Act. First, the policy was contained in its own section in the handbook, as opposed to being located in the more general anti-harassment policy. Thus, Brandies’ anti-union sentiment was the focus of the policy. Second, the policy was focused on pro-union activity; there was no acknowledgment that opponents of a union may harass fellow employees into rejecting union representation. Finally, the Court found that employees could conclude that engaging in protected activity was tantamount to harassment under the policy.

**Practical Tip:** The National Labor Relations Act takes a harsh view toward employers who treat pro-union employees differently than other employees. Employers should review their policies to ensure that nothing stated in their handbook makes that distinction. For example, if the employer prohibits employees from posting pro-union information on bulletin board, then the employer should also prohibit employees from posting other information on the board, no matter what the content.

## THE \$4 MILLION GOING-AWAY PARTY

“Boys will be boys,” but in the case of *Pollard v. E.I. DuPont De Nemours, Inc.*, 412 F.3d 657 (C.A.6, 2005), blatant sexually discriminatory treatment of a female co-worker in the peroxide plant cost the employer in excess of \$4 million dollars in compensatory and punitive damages when the female employee left her employment and sued for violation of Title VII and intentional infliction of emotional distress.

The sex discrimination toward Pollard began when a male co-worker played a Bible on her desk open to the passage, “I do not permit a woman to teach or have authority over man. She must be silent.” Then, after DuPont asked Pollard to give a talk to a group of girls coming to visit the plant for Take Your Daughter to Work Day, some of the men loudly complained about DuPont’s participation in the program. A number of men in peroxide circulated an email entitled “Bull Malarkey” to everyone in the plant discussing their displeasure with the program. After Pollard had discussions with her male co-workers about Take Your Daughters to Work Day, all of the men on the shift stopped talking to her. One of the men instructed the others not to eat with her, or take her instructions. It was common knowledge in the peroxide area that many of the men did not approve of women working in that department. One of the men made remarks to this effect approximately five times per week, and several consistently, and routinely referred to women as “bitches,” “heifers,” “split tails” and “c ts.” The men opposed the company-sponsored support group called the Women’s Network and disapproved of Pollard attending. The men played tricks on her that were unsafe and created the appearance that she was not doing her job. When she found another highlighted note on her desk, saying “A woman should learn in quietness and full submission. I do not permit a woman to teach or have authority over a man, she must be silent,” she left on medical leave.

The crowning blow came after she left. The entire shift, including her supervisor, held a party. They taped balloons to the ceiling and had a fish fry. The purpose of the party was to celebrate Pollard’s departure, and at the party, one of the men said “Glad the bitch is gone, glad the bitch is not coming back.”

The appellate court recently upheld the \$4.7 million awarded to Pollard by a jury for intentional infliction of emotional distress.

**Lesson:** Permitting abusive behavior toward a co-worker based on the co-worker’s sex can have severe consequences, even if the employee is not tired, but quits in dismay. Having a going-away party to celebrate the employee’s departure without inviting the employee, is never a good idea!

## HIDDEN SURVEILLANCE CAMERA-A BARGAINING ISSUE

Anheuser-Bush installed two hidden surveillance cameras in response to concerns that an elevator motors room on the roof of one of its buildings was being used for activities “inconsistent with its employees’ work assignments.” The cameras monitored that room and the rooftop stairs leading to it. The impetus for installation was a supervisor’s discovery of a table, chairs, mattress-sized foam pads and pieces of cardboard in the room, when the room was to be used only for immobilizing elevators for cleaning.

Both cameras operated continuously for over a month. When the video was reviewed, it revealed sixteen identifiable employees engaging in misconduct by smoking marijuana, urinating on company property, and/or being away from their assigned work areas for extended periods. It also showed four employees not engaged in misconduct, but doing job-related tasks. Anheuser-Bush did not inform the Union of the cameras until after they were removed. The Company's position was that this was a matter of "corporate security" over which it had no obligation of bargain with the Union. After many meetings, the Company discharged, suspended or disciplined all 16 employees based on its investigation of the video-taped activities.

The Union filed an unfair labor practices charge with the National Labor Relations Board against Anheuser-Bush. The NLRB found that Anheuser-Bush violated section 8(a)(5) and (1) of the National Labor Relations Act by failing to notify and to bargain with the Union before installing and using hidden surveillance cameras in the workplace. The use of such cameras is a mandatory subject of bargaining for unionized employers. It ordered the Company to cease and desist its conduct. But a majority of the NLRB ruled that the employees who engaged in misconduct were not entitled to a make-whole remedy, even though the misconduct was discovered through unlawful means.

On appeal, the Court agreed that an employer's unilateral use of surveillance cameras in the workplace, without first bargaining to impasse with the union representative, violates section 8(a)(5) and (1). There is no exception to mandatory bargaining for security-related matters. But the court noted that nothing prevents a unionized employer from using hidden surveillance cameras after bargaining over the issue, even if the Union doesn't agree.

The Court did not adopt the NLRB's reasoning for refusing to reinstate the employees who were discharged because of misconduct discovered through the unlawful videos, and remanded this issue to the Board for clarification, See *Brewers and Malsters, Local Union No. 6 v. N.L.R.B.*, 414 F.3d 36, 2005 WL 1560399 (C.A.D.C. 2005).

This case only applies to unionized employers. So are there no limits on what non-unionized employers can do with video cameras in the workplace?

Generally speaking, a private employer can use unannounced video surveillance in areas of the workplace where employees do not have a reasonable expectation of privacy. Locker rooms and bathrooms are off limits! Private offices may be off limits also, depending on the circumstances. Whether an employee has an objectively reasonable expectation of privacy in the workplace is determined by courts on a case-by-case basis. Therefore, it is best to advise employees in advance that video surveillance may be used on the premises, and what areas are subject to surveillance, so that the expectation of privacy is lowered.

In *Williams v. City of Tulsa*, 2005 WL 2476206 (N.D.Okla.), the employees sued the City for violations of the Fourth and Fourteenth Amendments to the Constitution, the Electronic Communications Privacy Act (18 U.S.C. § 2510 et seq.), and privacy tort law because of alleged surveillance in the rest rooms, private offices, the maintenance shop, the lift station, the weld shop, and various other open areas. The Court concluded that the only area where the employees had a reasonable expectation of privacy was in the rest rooms. But it dismissed the claims because of lack of any proof that rest room surveillance occurred.

The Electronic Communications Privacy Act, 18 U.S.C. § 2510, et seq., creates civil liability for the intentional interception of wire, oral, or electronic communications, But the Act does not

prohibit silent video surveillance, only interception of communication. In this case, there was no evidence of audio surveillance, so this claim was also dismissed.

**Tip:** If you are unionized, bargain with the Union before doing video surveillance; never do surveillance in rest rooms or other private areas; never record conversations when you are not visibly present. Surveillance video's must be silent.

## Q&A

*Q. Sammy is an exempt employee paid on a salary basis. She was injured off the job and is restricted to working 6 hours a day during her rehabilitation. If we reduce her schedule, can we also reduce her salary or pay her on an hourly basis, or will this cause us to lose her exempt status and give us liability for overtime?*

A. So long as you do not have a contract with her that would prevent you from reducing her salary for a reduced schedule during rehabilitation, the Fair Labor Standards Act will not be violated by the reduction. The Department of Labor approves the temporary pro-rata reduction of an exempt employee's salary or payment on an hourly basis because of medically restricted hours, without jeopardizing the employee's past exempt status. DOL Opinion Letter FLSA 2004-5.

*Q. Our company gives applicants two weeks of training on computer applications before hiring them. Trainees are not employees and are not paid. But we promise that if they satisfactorily complete our course, we will hire them and give them a \$500 signing bonus. Are we complying with the law?*

A. No. Trainees must be paid as employees under the FLSA unless all of the following factors are met:

- 1) The training is similar to that given in a vocational school;
- 2) The training is for the trainee's benefit;
- 3) The trainee does not displace regular employees, and works closely under the observation of employees;
- 4) The employer derives no immediate advantage from the trainee's activities, which may occasionally impede the employer's operations.
- 5) The trainees aren't necessarily entitled to a job at the end of the training; and
- 6) The employer and trainees understand that they aren't entitled to wages for the training time.

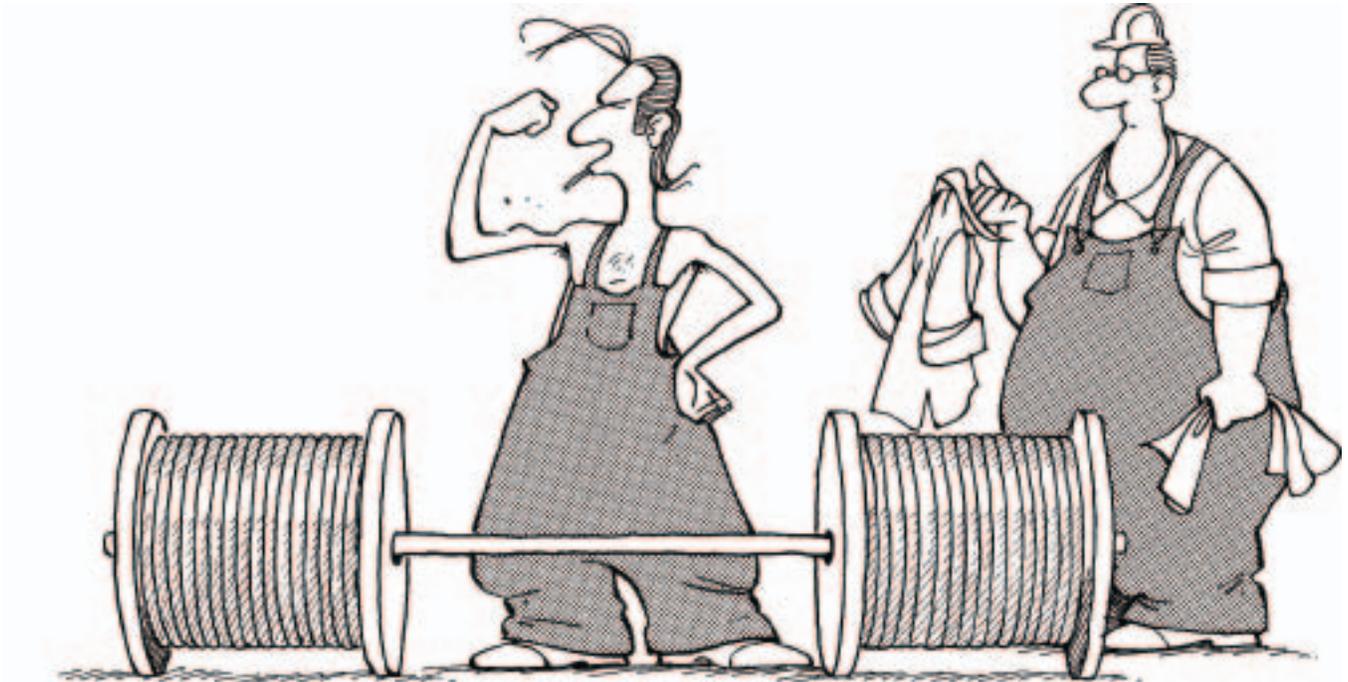
You are probably not satisfying the fifth and sixth conditions. But the DOL has approved a "job view" program in which potential employees observe the job for which they might be hired but are not given a guarantee of employment, perform no productive work, and are told at the beginning that there is no pay for attending. Opinion Letter FLSA 2004-16 and 2004-18.

*Q. One of our employees began using FMLA leave on October 10, 2005. He can't return until February 10, 2006(17 weeks). We know he can only take 12 weeks FMLA per year, but our policy doesn't define "year." Is it calendar, anniversary date or a rolling year beginning when the leave started?*

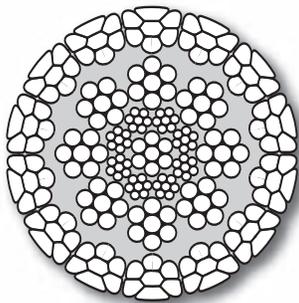
A. When your policy does not define it is whatever year is most favorable to the employee. The calendar year will give your employee another 12 weeks of leave beginning January 1, and will allow the employee FMLA through the anticipated return date of February 10. A rolling year would limit FMLA to December 31. A court will apply a calendar year because it is most favorable to your employee. You can change your policy to a rolling year for the future, but not for a leave that has already begun. 2004 WL 3421 791.



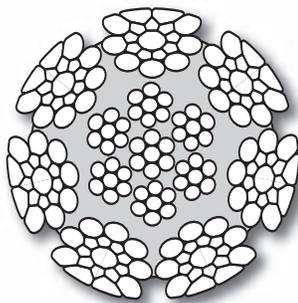
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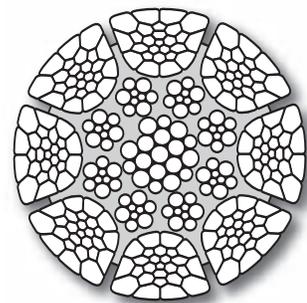
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# END OF YEAR PROFIT REVIEW



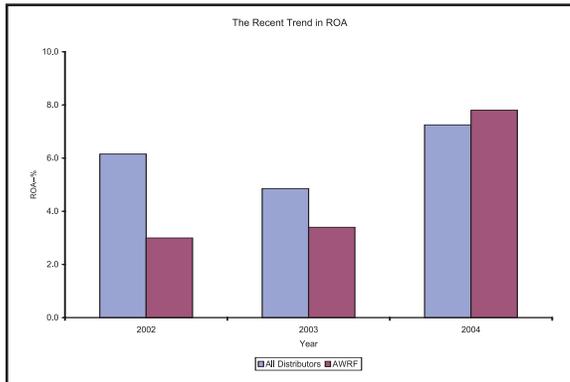
Al Bates

## Distributor Profitability Trends 2002-2004

The five exhibits in this report demonstrate how distribution organizations weathered the recession of 2002-2003 and recovered in 2004. On each of the exhibits, the “all distributors” number reflects the median results across forty different lines of trade where the Profit Planning Group collects data on an annual basis.

The median result minimizes the impact of unusual circumstances in one or two industries. It can truly be thought of as representative of all of distribution. On each exhibit results are shown for all of distribution and for your unique line of trade. In any instances in which the graph does not show a line, the appropriate figure is zero.

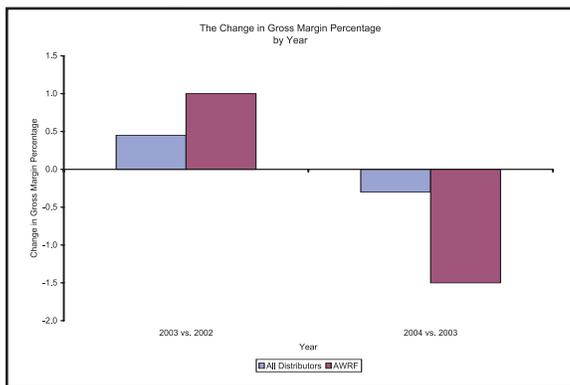
### The Recent Trend in ROA



Almost every one of the forty lines of trade experienced a decline in ROA in 2003 and a sharp recover in 2004. ROA is profit before taxes expressed as a percentage of total assets (or total investment) in the business. In 2003, the typical figure dropped below 5.0% which is the point at which firms should begin to think about asset redeployment.

In 2004 ROA returned to acceptable levels, coming in at just over 7.0%. However, even this figure is slightly below desirable performance. Industry ROA levels in the 8.0% to 12.0% range are considered good.

### The Change in Gross Margin Percentage by Year

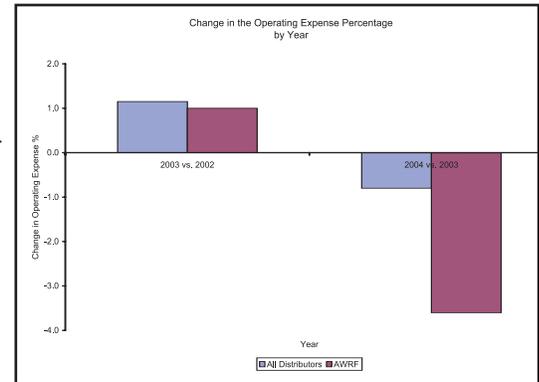


The overall change in gross margin percentage from year to year followed a counter-intuitive pattern. In 2003 the typical industry added slightly less than half a point to its gross margin percentage, despite recessionary pressures. During the recovery, gross margins than actually declined.

On an industry-by-industry basis, there were significant deviations from this pattern. However, overall firms found ways to use margin to offset the impacts of recession during the down year, but then moderated those changes somewhat during the period of recovery.

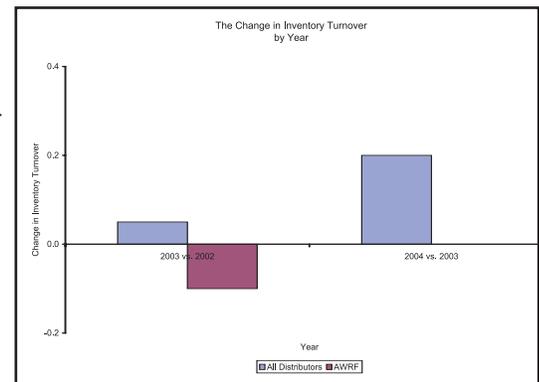
### Change in the Operating Expense Percentage by Year

Operating expenses followed the classic pattern of recession and recovery. Specifically, operating expenses increased as a percent of sales in 2003 due to stagnant sales growth in the best case and declining sales in the worst case. During 2004 the pattern reversed as reasonable levels of sales growth returned.



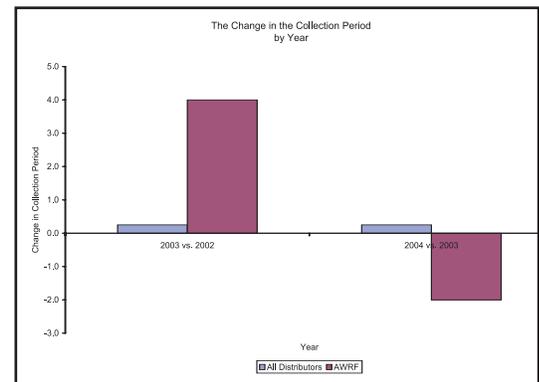
### Change in Inventory Turnover by Year

There was very wide variation in the inventory turnover pattern. However, for the amalgamation of industries studied, there were modest increases in inventory turnover in both 2003 and 2004. This reflects the continuing emphasis on cash flow management throughout distribution. Of all the factors that drive cash flow, inventory is by far the most controllable.



### Change in the Collection Period by Year

Not surprisingly, the collection period stretched out slightly in 2003. Despite the importance of accounts receivable on cash flow, firms always become more willing to let payments stretch out during a recession. The fact that the collection period continued to move up in 2004 reflects a reluctance to make dramatic moves in collections until the recovery is completely solidified. Collections will likely come back into line in subsequent years.



# AWRF TECHNICAL



**Jeff Gilbert**  
Executive Director / Secretary



**Don Pellow**  
Chairman

# SUB COMMIT



**Ken Sellers**  
Blocks, Tackle  
and Other Fittings



**Howard Will**  
Testing



**Knut Buschmann**  
Testing Methods



**Ron Raymond**  
Below the H



**David Johnston**  
Load Securement



**Dennis A. St. Germain Jr.**  
Round Slings



**Mark Kowalik**  
Web Slings

# COMMITTEE 2006

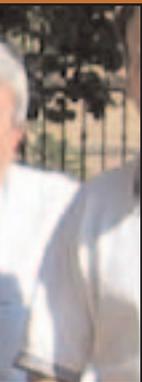


**Barry Epperson**  
General Counsel



**Don Sayenga**  
Technical Advisor

# COMMITTEE CHAIRS



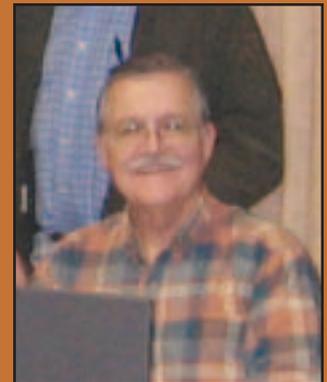
**Don**  
Hook Lifting Devices



**Ed Gower**  
Wire Rope / Wire Rope Slings  
Wirerope Technical Board



**Dan Merrill**  
Cordage / Cordage Slings



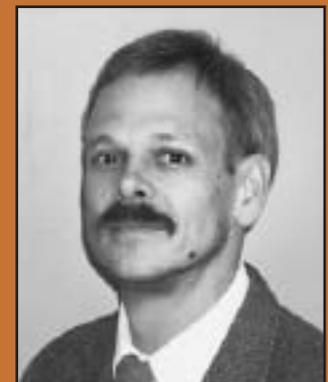
**Charles Lucas**  
Sling Fittings/ ASME B30.2C  
Rigging Hardware / ASTM



**Tony Mazzella**  
Chain and Chain Slings



**Mike Gelskey**  
Tagging and Warnings



**Brian Todd**  
Chain and Chain Slings

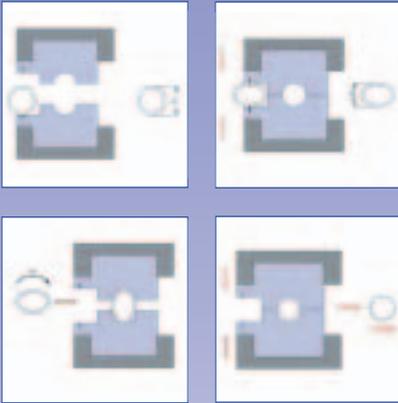


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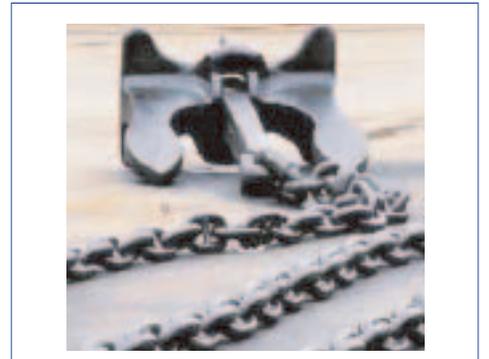
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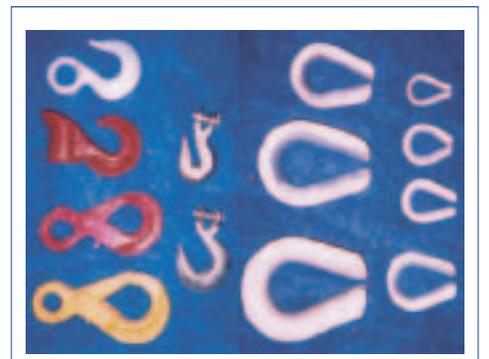
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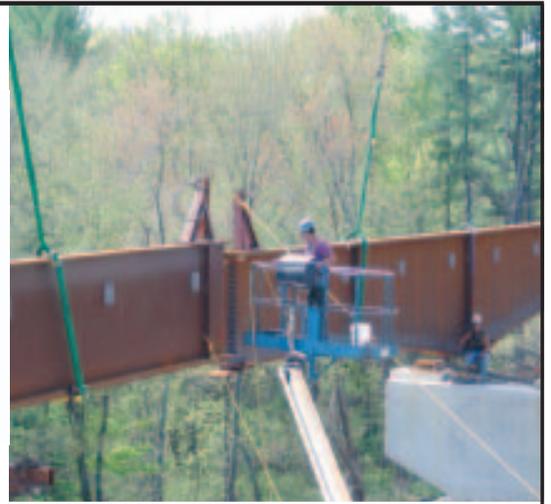


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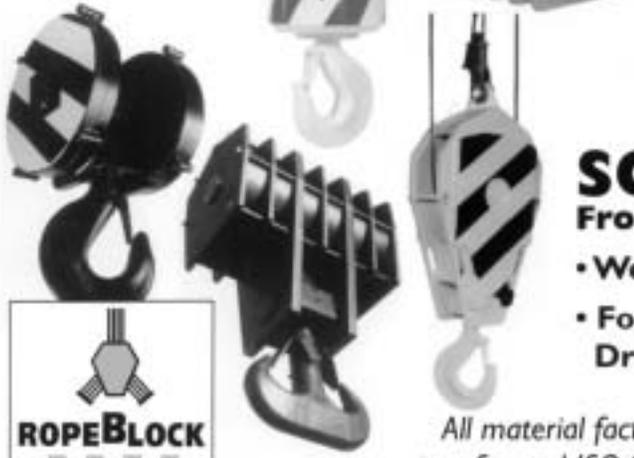
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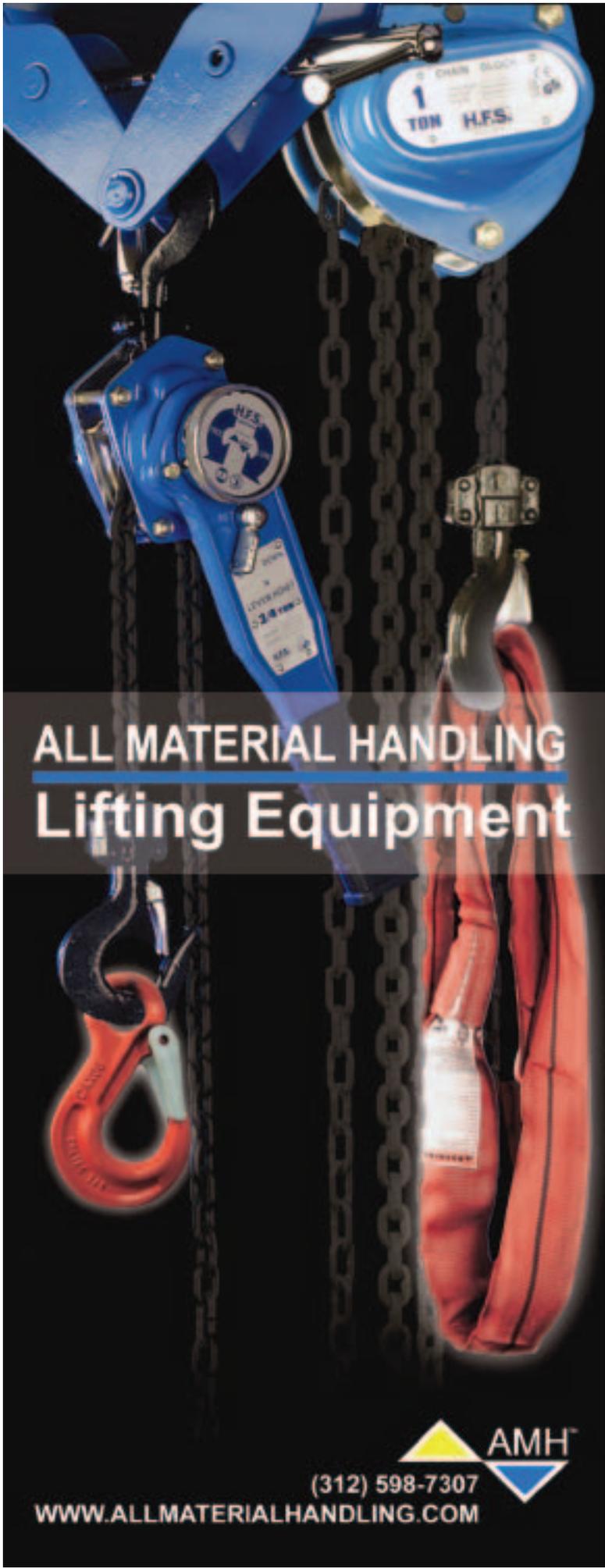
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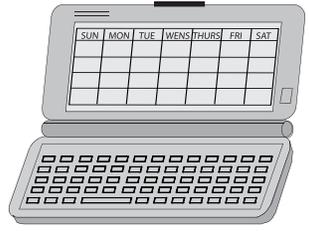
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- May 15-16** ASME B-30 Meeting  
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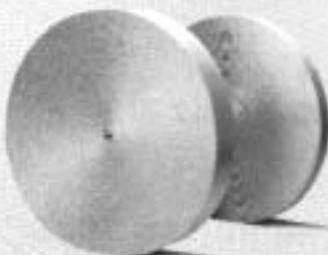
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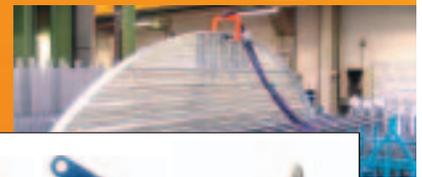


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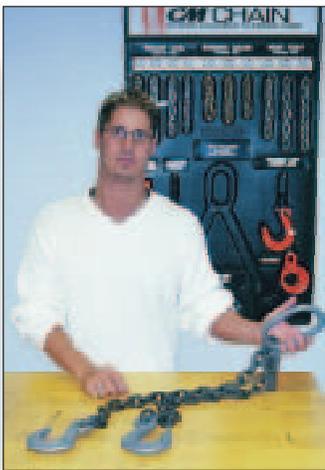
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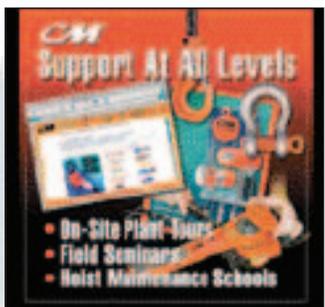


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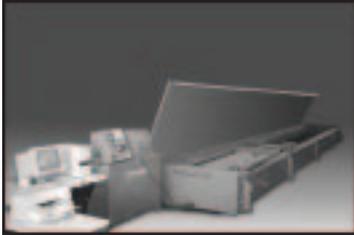
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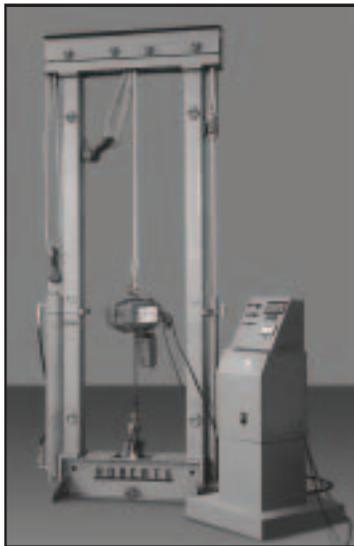


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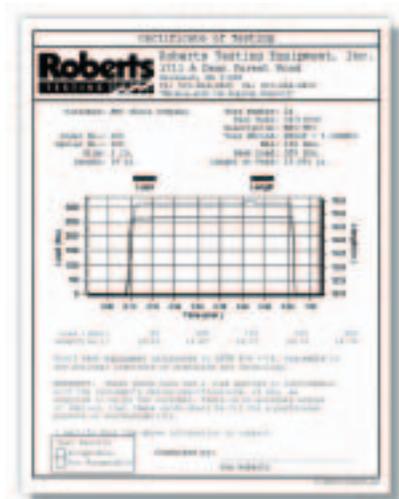
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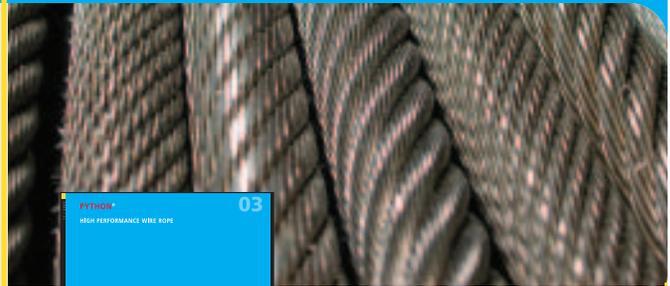
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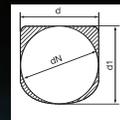
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