



International Window Cleaning Association

7918 Jones Branch Drive, Suite 300 McLean, VA. 22102
Phone: 800-875-4922 Email: info@iwca.org Web: www.iwca.org

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To Whom It May Concern:

The membership of the International Window Cleaning Association (IWCA) is represented by leaders in the window cleaning industry in major metropolitan cities as well as second and third tier cities across the country. The mission of the IWCA is to promote the success of members through standards of safety, education advocacy and research. Our membership has been consistently educated and concerned about safety in the workplace since our inception in 1989. We have achieved many milestones over the last 26 years, most notably a 40 percent reduction in fatalities.

Rope Descending Systems (RDS) are the predominant piece of building access equipment used in the window cleaning industry and have been since OSHA reviewed and then published eight safety guidelines for their use in 1991. In those guidelines, OSHA required workers on RDS to attach each of their two ropes to separate and independent "sound" anchors. Because of the multitude of buildings being serviced with RDS, identifying and ensuring a sound anchor became a real challenge for the window cleaning industry.

This challenge was met and only slightly overcome 10 years later in 2001 when the ANSI-IWCA I-14.1 Window Cleaning standard was published. This standard pointed out shared responsibility of a safe workplace between the building owner/manager and window cleaning contractor. This was the first nationally recognized document which outlined the need for buildings and contractors to identify, inspect, test and certify the capability of roof anchor rigging points when RDS were used.

With the published ANSI I-14 standard, the window cleaning industry finally had substantiating documentation to impress the need upon building owners and managers to provide assurance that the anchorages on roofs were safe because they would be identified, tested and certified. The standard was (and still is) referred to by architects, and newly constructed buildings continue to include roof anchorages for RDS more often than not. Contrary to this, however, compliance on existing buildings remained a challenge due to lack of total awareness of the I-14 standard; which is a voluntary consensus standard and thus does not have the force of law.

The IWCA participated in all the public hearings and information gathering during the OSHA promulgation of Subpart D and I, Walking and Working Surfaces. We were greatly pleased to acknowledge its publication in November, 2016 and satisfied that it incorporated many concepts from the I-14 standard such as use conditions, proper rigging and documentation identifying, inspecting, testing and certifying anchorage points prior to use. We congratulate OSHA's adoption of these best practices and do believe this new final standard will save lives and make daily operations safer for all industries that utilize Rope Descent Systems for building façade access including window cleaning.

We were somewhat surprised and concerned with the one year timeline for proper anchorage compliance included in CFR Section 1910.27. Our membership is concerned with how quickly

building owners and managers would receive and recognize these newly adopted changes to the regulations, and how quickly they would need to take action toward compliance.

Our concerns have now turned to a heightened state of urgency. While the IWCA has done its' best to inform its' members, who in turn are working diligently to inform the building owners and managers of the deadlines and commitments involved. Most are reacting with positive reception.

However, we are discovering that with the one year compliance timeline, there is little chance that many buildings will be able to complete all the steps to produce the required documentation on RDS anchorage points prior to November 20, 2017.

It is the overall sentiment of the industry that the revised regulation has been well-received, and actions are ongoing in many markets with positive momentum. However, reports and discussions with members and associates have indicated there are not enough qualified and professional engineering firms to perform the inspections or to design and perform or recommend proper testing protocols and therefore certify the anchorage points for use. In addition, it appears there are not an abundance of qualified anchorage manufacturing and or installation companies to repair or replace anchors that may have failed testing or install additional anchors to allow for proper rigging and compliance with CFR Section 1910.27.

IWCA has been working with OSHA for over 10 years toward creating a safe work environment for professional window cleaners across the country. Our membership has been working hard to educate the building owner and management industries on the effect the revised regulations will have on their properties.

We would strongly request that OSHA consider the feasibility of granting a one year extension to the November 20, 2017 compliance date.

The involved parties fully support executing the measures required. However, the scope and scale of the task is simply not logistically feasible within the timeframe set forth within the regulation.

Again, the IWCA thanks you for your consideration and support toward ongoing safety improvements within our industry. If you seek further information in support of your review of the above request, we would be happy to provide it.

Sincerely yours,



Jason York
President
International Window Cleaning Association



Stefan Bright
Safety Director
International Window Cleaning Association