



MAR 19 2013

Reply to the attention of:

J. Nigel Ellis
306 Country Club Drive
Wilmington, DE 19803

Dear Mr. Ellis: *Nigel*

Thank you for your December 21, 2012, letter to the Occupational Safety and Health Administration (OSHA). You have a specific question regarding OSHA's enforcement policy in regards to the new snap hook gate compressive strength requirement in ANSI A10.32-2012, *Personal Fall Protection Used in Construction and Demolition Operations*. This letter constitutes OSHA's response only to the requirements discussed and may not be applicable to any question not delineated in your original correspondence. Your question has been paraphrased below.

Question: Does OSHA plan to update the current enforcement guidance on snap hook gate compressive strength requirements published in Letter of Interpretation #20100427-9737, dated September 30, 2010?

Response: No. OSHA has no immediate plans to change its enforcement policy for snap hook compressive strength requirements. However, OSHA has rescinded Letter #20100427-9737 signed by Ben Bare, Acting Director, Directorate of Construction, on September 10, 2010 because ANSI revised its standard and removed the exceptions for construction. ANSI now requires snap hook gates used in construction meet the 3600lb compressive strength criteria; the same as general industry. When ASSE publishes the updates to ANSI A10.32-2012 and ANSI Z359.1-2007, *Safety Requirements for Personal Fall Arrest Systems, Subsystems and Components*, OSHA will reevaluate its enforcement policy.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. OSHA's requirements are set by statute, standards, and regulations. Our letters of interpretation do not create new or additional requirements but rather explain these requirements and how they apply to particular circumstances. This letter constitutes OSHA's interpretation of the requirements discussed. From time to time, letters are affected when the Agency updates a standard, a legal decision impacts a standard, or changes in technology affect the interpretation. To assure that you are using the correct information and guidance, please consult OSHA's website at <http://www.osha.gov>. If you have further questions, please feel free to contact the Directorate of Construction at (202) 693-2020.

Sincerely,

A handwritten signature in cursive script that reads "Jim Maddux".

James G. Maddux, Director
Directorate of Construction