



JUN 5 2019

Dr. J. Nigel Ellis
Ellis Fall Safety Solutions, LLC
Div. of DSC
306 Country Club Drive
Wilmington, Delaware 19803

Dear Dr. Ellis:

Thank you for your letter to the Occupational Safety and Health Administration (OSHA) Directorate of Enforcement Programs regarding 29 CFR 1910.23(b)(12). This letter constitutes OSHA's interpretation only of the requirements herein, and may not be applicable to any question not delineated within your original correspondence. Your letter requests clarification of the requirement under 29 CFR 1910.23(b)(12) that each employee use at least one hand to grasp a ladder when climbing up and down it. Your paraphrased question and OSHA's response are below.

Question: Under 29 CFR 1910.23(b)(12), are employees required to grasp the horizontal (round or D-shaped) rungs of a ladder when climbing up and down it?

Response: 29 CFR 1910.23(b)(12) requires employees to use at least one hand to grasp the ladder when climbing up and down it, but does not require employees to grasp a specific portion of the ladder, such as the horizontal rungs. The intent of 29 CFR 1910.23(b)(12) is for employers to ensure that workers maintain "three-point contact" (i.e., three points of control) with the ladder at all times while climbing. OSHA considers that grasping the ladder on horizontal rungs is preferable, and encourages employers to follow this practice. However, OSHA also recognizes that there may be times when it is necessary for employees to hold the side rails. Consequently, 1910.23(b)(12) does not require that employees grasp a specific portion of the ladder, such as the horizontal rungs, when climbing up and down it.

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 Enforcement Programs at (202) 693-2100.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Kapust", with a long horizontal flourish extending to the right.

Patrick J. Kapust, Acting Director
Directorate of Enforcement Programs