

REPORT DOCUMENTATION PAGE		1. REPORT NO.	2.		
4. Title and Subtitle NIOSH Testimony on Revision of Telecommunications Training Records by R. A. Lemen, June 15, 1987			5. Report Date 1987/06/15		
7. Author(s) NIOSH			6.		
8. Performing Organization Name and Address NIOSH			8. Performing Organization Rept. No.		
12. Sponsoring Organization Name and Address			10. Project/Task/Work Unit No.		
			11. Contract (C) or Grant(G) No. (C) (G)		
15. Supplementary Notes			13. Type of Report & Period Covered		
			14.		
18. Abstract (Limit: 200 words) This testimony is part of a NIOSH review of the proposed revisions for Telecommunications Training Records. OSHA proposes to revise this portion so that employers will be required to provide only a signed and dated certificate that states that new employees have received the training required by the standard. NIOSH agrees that the intent of the standard can be met by the proposed certificate of training. However, NIOSH recommends that the proposed certificate include either a table of contents or course agenda for the training program. NIOSH also recommends that the certificate be signed by the employee who received the training.					
17. Document Analysis a. Descriptors					
b. Identifiers/Open-Ended Terms NIOSH-Publication, NIOSH-Author, NIOSH-Testimony, Lemen-R-A, Occupational-safety-programs, Industrial-safety-programs, Worker-health, Safety-practices					
c. COSATI Field/Group					
18. Availability Statement			19. Security Class (This Report)		21. No. of Pages
			22. Security Class (This Page)		22. Price



5/19/86
NIOSH

Comments to DOL

COMMENTS OF THE
NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH
ON THE
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION'S
PROPOSED RULEMAKING ON REVISION OF TELECOMMUNICATIONS TRAINING RECORDS

29 CFR Part 1910
Docket No. S-020B

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Centers for Disease Control
National Institute for Occupational Safety and Health

June 15, 1987

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The National Institute for Occupational Safety and Health (NIOSH) has reviewed the proposed revisions to 29 CFR 1910.268(c), Telecommunications Training Records, and offers the following comments.

The Occupational Safety and Health Administration (OSHA) proposes to revise this portion of the Telecommunications standard so that employers will be required to provide only a signed and dated certificate that states that new employees have received the training required by the standard. The proposed certificate would also contain the name of the person who was trained, the name of the person who conducted the training, and the date that the training was completed. OSHA has made a determination that the proposed changes are in keeping with the spirit of the Paperwork Reduction Act of 1980 (44 USC 3501 et seq.).

NIOSH agrees that the intent of the Telecommunications standard can be met by the proposed certificate of training. However, we recommend that the proposed certificate include either a table of contents or course agenda for the training program. NIOSH also recommends that the certificate be signed by the employee who received the training. We believe that the employee's signature on the certificate will provide significant evidence that the required training has been received.

NIOSH also suggests that OSHA take this opportunity to revise the wording in 1910.268(c)(3) by substituting the more commonly used and precise phrase "cardiopulmonary resuscitation (CPR)" for the phrase "artificial respiration."