**Product Safety & Reliability Department** 

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Attn:

Safety Manager or Service Manager

Subject:

The Use of Fall Protection Equipment on JLG Products in the United

States and Canada

Pursuant to inquiries for information regarding the noted subject, the JLG Industries, Inc. Product Safety & Reliability Department submits the following:

JLG Industries, Inc. requires owner, user, operator, lessor and lessee compliance with all applicable regulations (employer, local, state, and national) pertaining to the utilization of aerial work platforms.

For fall protection on boom lifts, all JLG boom lifts are presently manufactured with lanyard anchorage points. The ANSI/SIA Standard for Boom-Supported Elevating Work Platforms (A92.5) and the Canadian Standard for Boom-Supported Elevating Work Platforms (CSA B354.4) require that all personnel in the platform wear fall protection devices at all times. In the United States, the OSHA regulation for aerial lifts (CFR 1926.453 (b)(2)(v)) requires occupants of the platform to wear a body belt with a lanyard attached to the boom or basket when working from an aerial work platform. As of January 1, 1998, OSHA's fall protection rule requires the use of a full body harness for fall arrest in place of a body belt when working from an aerial work platform. The full body harness shall be attached, via a lanyard, to a lanyard anchorage point. JLG Industries, Inc. requires owner, user, operator, lessor and lessee compliance to this current full body harness requirement.

There are no current requirements by ANSI/SIA, CSA or OSHA requiring personnel to wear a fall protection device on scissor lifts or vertical mast lifts (machines covered under the ANSI/SIA Standard A92.6 and A92.3 and CSA standards B354.2 and B354.1). Although not required by either ANSI/SIA, CSA or OSHA, many companies presently require that fall protection be worn with a lanyard attached to a lanyard anchorage point when working from scissor lifts or vertical mast lifts. JLG recommends that a full body harness be used with a lanyard attached to an authorized lanyard anchorage point when operating JLG scissor lifts or vertical mast products that do not have a 30-inch (76 cm) maximum lanyard length limit.

Machines with a 30-inch maximum lanyard length limit have a decal located next to the lanyard anchorage point indicating this maximum length. Where fall protection equipment is to be used on machines with a 30-inch (76 cm) maximum lanyard length limit, a fall restraint system must be utilized. Use of fall arrest systems is not authorized.

For certain JLG vertical mast products designed with the capability to open (retract) or remove the guardrail, JLG requires that appropriate fall protection equipment be used with a lanyard attached to an authorized lanyard anchorage point when the guardrail is not positioned entirely around the perimeter of the platform.

JLG presently manufactures new scissor and vertical mast lifts with lanyard anchorage points as standard equipment. For certain older models of JLG scissor and vertical mast lifts, not originally equipped with lanyard anchorage points, an authorized JLG distributor may install lanyard anchorage points per JLG specifications for the respective JLG product. These authorized lanyard anchorage points, as installed by JLG Industries, Inc., or properly installed by an authorized JLG distributor, are considered a means of fall arrest for a fall protection system. Contact JLG Industries, Inc. for further information regarding the installation of lanyard anchorage points on field units of JLG scissor and vertical platform lifts.

On any JLG scissor lift, not equipped with authorized lanyard anchorage points, personnel may attach to the mid-rail section of the main platform as a means of fall restraint only. On certain older models of JLG scissor lifts not equipped with authorized lanyard anchorage points, personnel may attach to the mid-rail section of the main platform rail as a means of fall arrest for a fall protection system. Contact JLG Industries, Inc. for further information regarding specific models for which this practice is authorized.

Lanyard anchorage points, as originally equipped or authorized by JLG for installation on JLG products, are designed and tested by JLG Industries, Inc. These authorized lanyard anchorage points meet or exceed the 2273 kg (5000 lb.) static pull test requirements set forth in the OSHA Standard 1926.502, section (d) (15) and lanyard anchorage point testing criteria as required in the applicable CSA B354 Canadian Standard. Each authorized lanyard anchorage point is designed specifically to be utilized by one (1) person only. There must be an authorized lanyard anchorage point for each additional person(s) in the platform.

When operated with manufacturer's operating instructions and recommendations, JLG products will remain stable should a person fall out of the platform while properly wearing an approved fall protection device (where the fall is limited to 6 feet or less) attached to a designated anchorage point. For JLG products designated for use with a 30-inch (76 cm) maximum lanyard length, a fall restraint system would prevent a person from falling out of the platform.

Should you have any questions or require additional information, please advise.

Sincerely,

JLG INDUSTRIES, INC.