

02UR019

# **ESP, Inc.**

*Experience Serving People, Inc. • Occupational and Environmental Safety & Health*

August 30, 2002

Doug Rumpca  
Vice President/ General Manager  
7509 N Highway 79  
Blackhawk, SD 57718

Dear Doug:

In my opinion, the request by the municipal council of Rapid City, South Dakota to install collapsible catwalks on a two sided 10'8" x 23" billboard in order to minimize visual obstructions is contrary to the requirements emphasized by the Occupational Health and Safety Association (OSHA). Catwalks on outdoor advertising structures are considered walking working surfaces. These are provided as a part of our employee fall protection system. We provide employees with a system that will limit the risk of a fall and protect them to a maximum load of 5,500 lbs. of force if they do experience a fall. That is why all our employees wear safety harnesses and lanyards connected to horizontal safety lines.

OSHA has several requirements for safety platforms but no requirements for collapsible catwalks. In fact, OSHA fines company's that have catwalks that may collapse. Please see the OSHA Notification regarding fines levied against Maine Contract Farming, LLC in Turner Maine dated 12/1/2000.

Lamar Outdoor Advertising prides itself on providing a safe working environment for all employees. We believe creating a potentially hazardous working condition with a collapsing safety platform outweighs any benefit derived for a cosmetic improvement. Consequently, we do not see any merit in devising a collapsing catwalk. In our industry, experience has shown that municipalities and like organizations increase their exposure from a liability standpoint by insisting on cosmetic improvements that may shortcut established regulations and Best Practices toward worker safety.

Sincerely,

**Bruce Higdon, CSP  
Safety Consultant**