

## **FACE Report recommendations could mislead**

**IN THE "SAFETY TIPS" SECTION** of your August 2012 edition, you published NIOSH's Fatality Assessment and Control Evaluation Report #09CA007 ("Warehouse worker dies after falling through skylight"). A warehouse worker fell through a skylight on a roof when performing a task that was not part of his job description. NIOSH indicated, "To prevent future occurrences: Workers should not perform any duties outside the scope of their normal jobs." That was the only remedy NIOSH mentioned.

NIOSH should have indicated that the skylight was in violation of OSHA standard 1910.23(e)(8), which has existed since 1971, and the ANSI standard first written in 1932 (ANSI A-12-1932). Skylights should have protective covers to prevent any worker on the roof from falling through the skylight. To prevent further occurrences, the first thing they should have recommended was to ensure that skylights were strong enough to prevent workers from falling through them as OSHA and ANSI require.

I realize you just copied what NIOSH recommended. However, the reader could be easily misled to think that the remedy is to allow skylights to be incapable of supporting a worker's weight and then to make sure that workers don't work outside of their normal job scope. As fall-protection expert Dr. J. Nigel Ellis has noted, a wide variety of people work on roofs and are exposed to slips and trips, which could result in falls through skylights in violation of OSHA and ANSI standards. These include:

- Roofers
- Cable TV antenna
- HVAC satellite dish
- Laborers
- Siding
- Electricians
- Mechanics
- Security
- Insulation installers/pipe wrap
- Telecom (towers/dishes)
- Cell phone dish installers
- Carpenters
- Maintenance (drainage, patching)
- Plumbers
- Glaziers
- Sheet metal
- Millwrights
- Landscapers
- Helicopter landing maintenance
- Stationary engineers
- Flagpole maintenance
- Painters
- Sign/display maintainers
- Chimney/stack maintenance
- Environmental air sampler reps
- Window cleaners
- Firefighters (fire drill or fire)

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