



**Date:** March 2, 2005  
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**From:** Marilyn K. Schuster, Policy Manager  
**Subject:** Fall protection and vehicle maintenance

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**Question:** I have a two part question regarding fall protection and vehicle maintenance.

1) Our company has a large lease fleet of airport refueling vehicles across the country. Our Regional Technical Representatives (RTR) visit these locations and conduct periodic maintenance checks that involve climbing on top of the vehicle storage tanks to check seals. We have engineered many other checks so that they can be done from ground level. We have looked at many systems to provide mobile fall protection for the RTR's but have not found anything that does not raise other potential safety hazards (i.e. towing a mobile work platform behind the service trucks for over 100,000 miles per year). My questions is are the RTR's required use fall protection? I have found a letter of interpretation from OSHA that seems to exclude vehicles.

2) The second part of the question involves over-the-road (OTR) truck trailers. We also have a service shop located in Salem that does repair work on OTR semi trailers. While in the shop the employees use a newly installed over-head harness type fall protection system. But this work also requires the shop personnel to perform service calls to trucks that have broken down roadside or need repairs at ODOT inspection/weigh stations. Do these employees need fall protection? The typical work they do at heights outside the shop is changing running lights.

**Answer:** While the federal OSHA interpretation you sent along applies only to employers in the construction industry, the foundation for their conclusions may apply in other industries. In your first example, trucks at the airport, Oregon OSHA would not require fall protection for the trucks on the flight line. Fall protection in those areas is not usually feasible. This is not to say vehicles are exempt but to acknowledge individual circumstances as related to feasibility.

In your second example, we conclude that roadside repairs would not likely occur in a situation where fall protection was feasible.

