

July 16, 2001

Tiff Smith, Safety & Loss Control Consultant
Associated General Contractors
9450 SW Commerce Circle, Suite 200
Wilsonville, Oregon 97070

Dear Mr. Smith:

This letter is in response to your February 3rd letter requesting information on the fall protection requirements for working on cell phone towers. Thank you for your patience in waiting for our reply. As was explained to you during a telephone conversation with Mike Mitchell, the reason for the delay was to wait until one of our staff members returned with information from a training class, held in Cleveland, Ohio, on safe work practices dealing with cell phone tower erection work.

You asked whether employees doing cell phone tower erection must be tied off at all times while moving or working on the tower and would fall protection be required? Fall protection for heights of more than 10 feet is required unless connecting steel beams. **“Free-climbing” on cell phone towers is not allowed.** Since tower erection is construction, OAR437-003-0040(1) applies. OR-OSHA’s Program Directive A-232, available on the OR-OSHA web site, is a good source of information.

For further information, such as suggested work practices that were presented in the training, please contact Mike Mitchell, at 503-947-7450. You are also invited to see the OR-OSHA pages on the Internet at the above address.

Sincerely,

Marilyn K. Schuster, Manager
Standards & Technical Resources
Oregon Occupational Safety and Health Division