

Assistant Secretary for
Occupational Safety and Health
Washington, D.C. 20210

February 10, 2014

Dear Communication Tower Industry Employer:

In recent months, the communication tower industry has experienced an alarming increase in worker deaths. In 2013, 13 workers in the industry were killed at communication tower worksites. This is more worker deaths than in the previous two years combined. Four more workers have been killed in the first weeks of 2014.

Every single one of these tragedies was preventable.

OSHA is aware that there has been acceleration in communication tower work during the past year due to cellular infrastructure upgrades, and the Agency is concerned about the possibility of future incidents, especially when the hazardous work is done by employees of subcontractors. It is imperative that the cell tower industry take steps immediately to address this pressing issue: no worker should risk death for a paycheck.

OSHA has found that a high proportion of these incidents occurred because of a lack of fall protection: either employers are not providing appropriate fall protection to employees, or they are not ensuring that their employees use fall protection properly. As a result, communication tower climbers are falling to their deaths. In addition to falls, workers face other hazards in the field. In the past few months, tower workers have been injured and killed by falling objects, equipment failure, and the structural collapse of towers. While these incidents are not as frequent as falls, they are very real hazards to protect against.

I am writing to remind you that it is your responsibility to prevent workers from being injured or killed while working on communication towers. All employers, especially those employers in high-risk industries such as communication tower operations, have a responsibility to recognize and prevent workplace hazards.

In order to safeguard employee safety and health:

- Prior to their initial assignments, it is critical for newly hired workers to be adequately trained and monitored to ensure that safe work practices are learned and followed.
- As required under the OSH Act, when working on existing communication towers, employees must be provided with appropriate fall protection, trained to use this fall protection properly, and the use of fall protection must be consistently supervised and enforced by the employer. Fall hazards are obvious and well known, and OSHA will consider issuing willful citations, in appropriate cases, for a failure to provide and use fall protection. States with their own occupational safety and health plans may have additional requirements. A full list of State plans is available at <http://www.osha.gov/dcsp/osp/index.html>.
- During inspections, OSHA will be paying particular attention to contract oversight issues, and will obtain contracts in order to identify not only the company performing work on the tower, but the tower owner, carrier, and other responsible parties in the contracting chain.
- Contractor selection should include safety criteria and close oversight of subcontracting, if allowed at all. Simple "check the box" contract language may not provide enough information to evaluate a contractor's ability to perform the work safely.

For the sake of your employees and your business, I strongly urge you to do everything you can to prevent these needless injuries and deaths before anyone else is hurt, and before OSHA issues additional financial penalties.

OSHA has developed a web page with important information on protecting workers in communications work. It can be viewed at

<http://www.osha.gov/doc/topics/communicationtower/index.html>

OSHA state consultation programs are available to assist small to medium sized companies in complying with OSHA standards. If you have further questions, please contact your local OSHA Area Office, State Plan Office, or your State Consultation office at <http://www.osha.gov/dcsp/smallbusiness/consult.html>, or by calling 1-800-321-OSHA.

Sincerely,

David Michaels, PhD, MPH