U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration 300 Fifth Avenue, Suite 1280 Seattle, Washington 98104



Commissioner Heidi Drygas Alaska Department of Labor and Workforce Development 1111 W. 8th Street, Suite 308 Juneau, Alaska 99801

Ms. Drygas,

I am writing in support of Senate Bill No. 148 which allows the State of Alaska to implement a recent change to a Federal Occupational Safety and Health Administration (OSHA) regulation. The final rule imposes additional or more stringent requirements on employers than existing OSHA standards. On September 18, 2014 the OSHA published a Federal Register Notice on the Final Rule for Occupational Injury and Illness Recording and Reporting Requirements – North American Industrial Classification System (NAICS) Update and Reporting Revisions, effective January 1, 2015.

This new regulation expanded the reporting criteria for employers that had employees who suffered two types of injuries; the loss of an eye or an amputation. Since the state of Alaska has an approved state plan program they are required to adopt an at least as effective standard or amendment to their existing standards within six months of the date of notification. The current Alaska state standard AS 18.60.058(a) does not include the two new reporting criteria, therefore Alaska must either amend their current standard or adopt a new one.

In the interest of providing Alaska's workers the same, or greater, level of protection as afforded under OSHA's program, we ask that you work to address this issue in a timely manner.

If you have any questions regarding this matter, please do not hesitate to contact Scott Ketcham, Anchorage Area Director at 907-271-5152.

Sincerely,

David J. Baker

Assistant Regional Administrator Cooperative and State Plans