

**DEPARTMENT OF CONSUMER & BUSINESS SERVICES**  
**Oregon Occupational Safety & Health Division**

**MEMORANDUM**

**Date:** May 20, 1997

**To:** Standards & Technical Resources File

**From:** Mike Mitchell

**Subject:** Use of Body Harness for Aerial Lift in Electrical Power Work

---

As a result of a telephone conversation with David Wallis, Federal OSHA, Electrical Standards Section, Washington D.C., (202-219-8161), the following answer was received in response to the question of whether safety belts will be allowed to be used after January 1, 1998 as fall protection in aerial lifts while doing electrical power generation, transmission and generation work.

Mr. Wallis stated that his answer was directed at 1910.269 and that his answer should not be taken as the official interpretation from Fed. OSHA since he only helped write the standard, and is not part of the section that offers interpretations. He also stated that his answer covers only aerial lifts used by electrical power crews, not those used in other kinds of work. Such work makes the use of the fall protection in aerial lifts come under subpart M of 1926. Thus, full body harnesses will be required to be used by workers in aerial lifts doing electrical power generation, transmission or generation work after January 1st. If the lanyard is kept short enough so that the free fall is 2 feet or less, then a belt will be allowed since such a device would be positioning equipment rather than fall protection.

This lines up with my research. 1910.269(g)(2)(I) references into 1926, subpart M. 1926.502(d) prohibits the use of safety belts after January 1st., and 1926.502(e) addresses the use of positioning devices.