

PASS Victory: Two-Person Interim Measures Instated

On December 30, 2009, Teri Bristol, vice president of Technical Operations, sent a memo to all service area directors detailing interim measures for compliance with the two-person rule. PASS has been working for years to draw attention to the safety risks posed when technicians are sent to perform maintenance work alone in situations where there is a risk of electrocution or fall. PASS National Safety Representative Kevin Conrad calls the measures a major victory and a building bridge toward greater safety improvements.

“I have been pushing the two-person rule ever since I started as the PASS safety representative,” said Conrad. “It doesn’t mean we are over the hurdle yet, but we are blazing a new trail to help technicians do their work more safely.”

The implementation of the interim rule dates back to work done in 2008 by Ron Pevehouse, Chapter NV1. In October 2008, Pevehouse submitted an issue paper to the Western Pacific Occupational Safety, Health and Environmental Compliance Committee (OSHECCOM), which eventually resulted in the formation of an FAA Air Traffic Organization (ATO) headquarter workgroup to address emergency response procedures for remote facilities. The workgroup included PASS members and managers and, during the course of the meetings, they discovered a series of problems. The group determined that the term “remote” should not be strictly geographically based and instead should be considered in terms of the time of response. The workgroup submitted several recommendations and the ATO adopted them with the intention of making them policy. One of these recommendations was to implement an interim policy on the two-person rule.

“This is an interim rule because there are two other things currently in development that will require the two-person rule: the ATO fall protection program and the ATO electrical safety program,” explained Conrad. “Even though we know there are things coming in the future that will require a two-person rule, PASS wanted something to provide protection to employees in the meantime.”

The FAA agreed with the concept of a letter detailing interim measures but months went by without a memo being issued. At an October 2009 OSHECCOM meeting, Conrad questioned Bristol about the delay. “She expressed concern that putting out a letter would result in questions and phone calls from the field asking for more guidance. She wanted to wait for orders to come out related to the other two programs,” said Conrad. When the meeting moved on to the topic of fatigue, Bristol explained to the committee the different types of things technicians are doing out in the field by themselves. “When she was saying that, I knew I could use her own words to convince her of the importance of the two-person interim measures,” said Conrad. She finally agreed to draft the memo, which was sent to Conrad for feedback prior to being disseminated to the field.

Conrad cannot comment on whether Bristol has received phone calls and questions related to the rule, but he has certainly had requests for information. “The measures are vague,” he admitted. “Technicians have to use commonsense when wondering if they need to go out as a team. But the measures afford protection to employees who believe two people are needed—even if a

manager is insisting the work be done without the proper staff. I didn't want a manager out there saying that two people weren't needed. The people who make that decision should be the technicians who are placing themselves in harm's way. They are the ones with the skills and expertise to judge the type of work they are doing."

Conrad pointed out that there are going to be instances where technicians are working around electrical equipment and two people are not needed. "If you are testing a 12-volt test point, you don't necessarily need two people," he said. "But consider the type of work you are doing. If you are testing a 12-volt test point and have to reach around a higher exposed voltage source, you may need an additional person on site. Not because you are working on 12 volts but because of the other electrical hazard in proximity of the work."

There is more information forthcoming related to the two other programs and CPR/first aid training for employees. Conrad suggested staffing may need to be increased at certain facilities when the two-person measures are more specific and become mandatory.

"This is new stuff. We are changing the way we do business because we are starting to think about *our* safety," said Conrad. "Our mission is to keep the National Airspace System operating but we have to find a way to marry that with protecting employees. Things like the two-person rule and safety training—those are things that will help us perform our mission more safely. These interim measures are just little victories along the way, but we will get there."

The ATO memo regarding the interim measures is posted in the "Safety" section of the PASS website at www.passnational.org. Any member with questions about the measures should contact Kevin Conrad at (317) 882-6123 or kevin.conrad@passmember.net.