

In the field of industrial safety, the Association's Engineering and Safety Department develops and publishes recommended safety codes and ordinances for buildings, elevators and the control of fire hazards. It prepares and issues bulletins to members and to public officials on matters of special interest in accident and fire prevention. This Department studies special hazards in specific industries and recommends, on a consultative basis, safety measures.

Thus, the Engineering and Safety Department is dedicated to providing the research and facilities the industry must have to keep pace with new processes, materials, and procedures produced by advancing technology. The Department augments the efforts of the engineering departments of our member companies. The common objective is the maintenance of high standards of advisory service to insured organizations and to the public generally.

H.R. 1264 would clarify the responsibilities of the District of Columbia Industrial Safety Board. The provisions of the bill would better carry out the intent of Congress when it established the Industrial Safety Board in 1941. The Congress then declared the Board's purpose to be "to foster, promote, and develop the safety of wage earners of the District of Columbia in relation to their working conditions."

We understand that through a series of opinions rendered by the District of Columbia Corporation Counsel, the Board's jurisdiction has been limited to industrial places of employment. While we do not purport to dispute the accuracy of these opinions, we believe that the law should be clarified in the public interest and in the manner proposed by H.R. 1264.

Hence, we agree that the definitions in Section 36-432 of the D.C. Code should be broadened so as to extend beyond places of "industrial employment." Establishments should be subject to safety regulations and inspections.

We note that the District of Columbia Board of Commissioners would retain their present authority to approve and issue safety regulations proposed by the Board. We are sure that the Board and the Commissioners will only issue regulations after due consideration of the effect of such regulations on all interested parties.

It is respectfully requested that this letter be made a part of the record of the hearing on this bill, which we understand is scheduled for April 28, 1967.

Very truly yours,

DAVID M. MARSH, *Counsel.*

Mr. SISK. With that, the committee will stand adjourned subject to the call of the Chair.

(Whereupon, at 12:00 noon, the subcommittee was adjourned, to reconvene subject to the call of the Chair.)