

slower the machine operates; the smaller the type, the faster the operation. Therefore, it is unreasonable to say that belts do not need a guard when operating under 250 feet per minute and do need a guard when operating over 250 feet per minute. It is the same machine.

The only two companies that make the machine in question report that they have never had a report of an accident on this part of the machine. Mergenthaler Linotype who have marketed 75,000 linotypes over a period of 75 years stated they never had the requirement for a guard because they never considered the belt as a hazard. They have never placed a guard on a single machine.

Further the Safety officer for the Government Printing Office stated:

"It is my considered opinion that accepting the speed of a belt in feet per second and/or size of the belt as the sole criteria of determining the need for guarding is not valid."...

"It has been determined by the Engineering Staff of the Government Printing Office and the undersigned that a guard enclosing the matrix distributor drive belt would create a hazard to the operator when it is necessary to clear a jam in the distributor unit and that the open belt does not constitute a hazard based on the above criteria."

My plant was periodically inspected by the Columbia Typographical Union No. 101 and the inspection report as to the health, safety and welfare of the employees by their own representatives disclosed no unsafe conditions.

Despite the testimony of all these experts from industry, labor and management, that the guide as set out by the rules and regulations and enforced by the Minimum Wage and Safety Board were unreasonable, and in fact compliance therewith, created a real hazard, the inspector and the Director adhered to the archaic standards of the American Standard Safety Codes.

Our problem would never have occurred had the statute allowed members of industry and labor to assist in formulating the safety standards for their industry or if the inspector had a workable knowledge of the machines, or if I had had the right of a personal appearance to appeal the directors decision to the Board. As it was, I sent a letter in accordance with instructions from the Director of Safety, and was subsequently notified that a hearing had been held and an adverse ruling was held against me. I have never appeared or been represented before the Board.

A law, rule or regulation which does not afford these safeguards, should not be expanded to other private sectors of the economy without adding safeguards to protect the individual employer and the industry in providing reasonable standards and rules of safety.

I realize that in presenting this testimony before this committee I may in the future, be subjected to harassment, unfounded accusations, and other acts of badgering, by those who seek expansion of the present law. However, I feel that it is my duty to appear and offer what I believe to be constructive suggestions to this committee so that what has happened to me and to our industry will not happen to others when this law is expanded to cover 300,000 additional workers.

Mr. OLSEN. I do not know whether any purpose would be served by reading the complete statement, and I think we have left copies of it for the Committee.

Basically our purpose here is not applied to the additional coverage of the Act, but presently the administration of the Act. It is our feeling if the continuation of the present administration is included in the new coverage it will open up a field that could be extremely hazardous as far as the employers in town are concerned and we base this on the experience of the printing industry in Washington.

We would like to suggest, which we have outlined somewhat here in the back of the statement that some changes be made to allow the aggrieved party some action, some appeal rather than go to Court with it. Going to Court, in addition to being timely, I mean untimely, and costly, is really not the place for a hearing such as this type where you want to introduce evidence where you would like to cooperate rather than argue. The courts usually restrict what can be introduced and this sort of thing so there is a real story, and in our particular