

Standards Association is an attempt to bring about greater uniformity in the development of safety regulations by the various regulatory trade associations, insurance companies and rating bureaus. The desirability of cooperating in this movement was evident to the Department whenever it endeavored to collect material for the development of regulations on a particular subject. National codes are developed by the best minds in the country and the Department, therefore, has the opportunity of taking advantage of expert opinion, which it could not do if it had to pay for such service.

An additional advantage to the Department in adopting the national codes as a basis for state codes, is that it simplifies inspection work. The national codes are being used by national trade associations as standards to be used by their members in the manufacture of their products. This means that machinery and equipment will be sold direct to Pennsylvania industries in a form acceptable to the Department making it unnecessary to issue orders for the purchasing of this equipment. It will mean that in an industry, such as the contracting industry, the members of which no longer confine themselves to a particular locality in which to work but who go out for business everywhere, can be assured that their equipment will be acceptable wherever they go and that they will know and understand the rules and regulations that they will be required to comply with. For these and many reasons the Pennsylvania Department of Labor and Industry has joined the ranks of other forward looking states and is using national codes as the basis of the state regulations whenever this is possible.

Whenever national codes are not used, the Research Section conducts its own investigation and from the data collected prepares a tentative draft of the proposed regulations. An advisory committee from the industry to be affected by the regulation is appointed to whom is referred this tentative draft. This committee composed of employers, employes, technicians, and members of the Department, use this tentative draft as a basis for discussions and for preparation of a new draft for presentation to the Department. One such advisory committee is now cooperating with the Bureau in the development of the new Fire and Panic Regulations. Clarence W. Brazer, President of the Pennsylvania Institute of Architects, assisted in the formation of this committee, which is composed of Irwin T. Catharine and George I. Lovatt, both of Philadelphia; Julian Millard, Harrisburg; G. Wesley Stickle, Erie; and Donald F. Innes, Wilkes-Barre.

From this point, the procedure in the development of regulations is the same whether the national code plan or the state committee plan is used in preparation of the tentative draft. The draft of the regulation is sent to the Industrial Board in order that it may hold public hearings on the regulations to determine whether they shall be approved for promulgation. A copy is also sent to the Bureau of Inspection for its criticism from the viewpoint of their practical experience. The criticism received by the Industrial Board in this way is reviewed by the Bureau of Industrial Standards, and a final draft of the regulations prepared, which is again submitted to the Industrial Board for final approval. Promulgation by the Secretary of Labor and Industry immediately follows approval.

This outline of the procedure followed by the Bureau of Industrial Standards in the development of regulations indicates the effort that