

**North Carolina Department of Labor  
Occupational Safety and Health Division**

**Raleigh, North Carolina**

Field Information System

Operational Procedure Notice 122

**Subject:** CPL 2-1.29 - Interim Inspection Procedures during Communication Tower Construction Activities.

A. **Purpose.**

This instruction describes OSHA's inspection policy for uniform enforcement of standards addressing fall protection and safe access to communications towers during construction. OPN 122 supplements the guidance in CPL 2-1.29. These two documents combine to establish policy in North Carolina, and neither shall be applied independently of the other.

B. **Scope.**

This policy applies to construction activity throughout North Carolina.

C. **Discussion.**

CPL 2-1.29 is supplemented as follows:

**Para. VII. 1.** Employees climbing the tower, or at a work station at any height above 6 feet, shall be protected from falling by a guardrail system, safety net system, ladder safety device, fall arrest system, or positioning device system when possible. Personal fall arrest systems shall comply with the provisions of 29 CFR 1926.502(d). During early stage, steel erection/ assembly operations below 25 feet, in which no adequate tie-off anchorage point(s) exist, fall protection systems are not required. As soon as adequate tie-off anchorages are established, fall protection systems shall be provided and used. Fall protection systems are required 100% of the time employees are working or moving at levels above 25 feet.

**Para. VIII. 1.** Employers who fail to provide fall protection equipment to employees moving or working at levels above 25 feet may be cited under 29 CFR 1926.28(a) or .105(a) as appropriate to the circumstances.

**Appendix A., Para. 2, Equipment.** Personnel hoisting operations to work levels above 200 feet shall comply with the provisions of 29 CFR 1926.550(g).

D. **Action.**

OSHNC personnel will conduct inspections, surveys, assistance, and training in accordance with the guidance contained in CPL 2-1.29 and OPN 122. This policy is effective on the date of signature, and will remain in effect until rescinded by the Director.

Signed on Original

Eric J. Smith  
Safety Compliance Officer

Signed on Original

Robert K. Andrews, Jr.  
Director

Signed on Original

Jack R. Forshey  
Safety Standards Officer

6/1/99

Date of Signature