

**Subject:****Counterfeit "CROSBY" Shackles****Scope**

All EAF locations

Purpose

To raise awareness of potential counterfeit Crosby shackles and the consequence of their use.

Description

Counterfeit Crosby Shackles have been found at locations in Europe. These shackles are NOT up to required standards and it is mandatory that they be immediately removed from service. The counterfeit shackles can fail at as low as just 40% of their stated rating, causing a potentially catastrophic outcome. The most obvious difference is that the counterfeit shackle has the word "CROSBY" all in capital (Upper Case) lettering. The genuine shackle only has the word "Crosby" capitalized.

See description below, which shows the key differences between a genuine shackle and a counterfeit one.



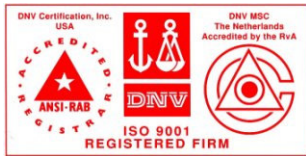
The points to look for in deciding whether you have a Crosby Shackle or a copy are:

- On the face, (a) the Crosby Name should be embossed as per the Crosby Logo, (b) The CE mark should appear along with (c) markings of the 45 degree angles
- On the rear of the shackle should appear 2 different groupings of IDs (3 for Belgium manufacture) providing full traceability of the shackle.
- The pin should also be stamped (d) on the head with a traceable ID number.

Responsibility for Action

- All QHSE Staff to coordinate and document a complete inspection of shackles in their locations and destroy any suspected counterfeit shackles. Liaise with your Lifting Equipment Specialists.
- Add the requirement to sample a selection of shackles to your Yard Planned General Inspection checklists to ensure on-going vigilance.

ALERT No	Issued by	Approved by	Date
OFS/NSG/2007/005	Adrian Hak	Graeme Lawrie	17 th May 2007



GENERAL OFFICES
2801 DAWSON ROAD (74110-5040)

P.O. BOX 3128
TULSA, OKLAHOMA 74101-3128

TELEPHONE 918-832-5347
CROSBY FAX NO. 918-834-9447

PAUL BOECKMAN, P.E.
VICE PRESIDENT ENGINEERING

May, 24, 2007

Subject: Crosby Shackles

To Whom It May Concern:

The Crosby Group, Inc. has recently been made aware of a counterfeit shackle alert that has been circulating. Please be advised that the undated and unauthorized alert contains some of the photographs and information of a previous unauthorized alert of 2004. The alert is not based on a new occurrence or finding, and is wrong and misleading. We have contacted the OSHA Office of Maritime Enforcement (referenced on the recent alert) with regard to the content, and they have provided a clarification and retraction (see the attached email from OSHA Director of Office of Maritime Enforcement).

To make sure we maintain the confidence of our product users, Crosby has established a systematic review process of any possible suspected counterfeit Crosby products. We first review pictures of the product and then perform a metallurgical study of any suspect product to make a final determination. Through this review process, we have evaluated a number of suspected products and found them to be genuine Crosby product. We have never detected a counterfeit shackle in the U.S. Given this, and the fact that we produce millions of shackles each year, there is not a counterfeit issue regarding our shackles.

The primary reason people submit possible counterfeit products to us for our review is the appearance of lettering. The lettering and marking of the product is only one characteristic to consider when determining the authenticity. The lettering will vary somewhat from each size of product, and may change with each revision of the forging die. In fact, although not currently done, Crosby has produced shackles with the "Crosby" lettering in all capital letters, rather than the styled Crosby logo in block letters. Therefore, a visual difference of lettering is not indicative of a counterfeit product. Additionally, there have been changes in the manufacturing method to improve the product through the years. These improvements can change the size and shape of the product and lettering.

We have been diligent about investigating all concerns that users have regarding the authenticity of products. If there is any suspected product, we stand ready to have it analyzed and make a factual determination in a matter of days. In closing, our objective is to provide the industry with the most accurate information regarding potential counterfeits. We are prepared to review any suspected product and make a determination of the authenticity. Thanks for the opportunity to clarify this matter and get the facts to our valued customers. If you need any additional information, please do not hesitate to contact me.

Thanks and regards,

Paul Boeckman, P.E.
Vice President, Engineering
paulboeckman@thecrosbygroup.com

products of uncompromising quality...

CROSBY Clips & Fittings, **LEBUS** Load Binders, **McKISSICK** Blocks & Sheaves, **CROSBY-WESTERN** Blocks, **NATIONAL** Swaging Systems

Plants and facilities in: Jacksonville, Arkansas - Los Angeles, California - Atlanta, Georgia - Chicago, Illinois - Tulsa, Oklahoma - Harrisburg, Pennsylvania

Dallas, Texas - Longview, Texas - Seattle, Washington - Toronto (Brampton), Ontario - Barnsley, England - Mechelen (Putte), Belgium - Clergy St. Christophe, France

Paul A. Boeckman

From: "Butler, Steve - OSHA" <Butler.Steve@dol.gov>
To: "Paul A. Boeckman" <PaulBoeckman@TheCrosbyGroup.com>
Sent: Wednesday, May 23, 2007 9:56 AM
Subject: Copy of Counterfeit Shackle Page

Paul:

We have reviewed the "Caution" Counterfeit Shackle Page and discussed this "Caution" page with the OSHA accredited agency "Signatory Authority" referenced in the page and he: (1) confirmed that neither he nor any representative of his company originated the page or contributed to the content, and (2) that the reference in the page to weight testing and deformation at 40% of the SWL is not valid.

As we discussed last Friday, the statement in the "Caution" page regarding shackles with lead capitol letters only and shackles with all capitol letters as a means to determine the manufacturer of origin is incorrect (this misinformation originated from a report from several years ago regarding a shackle found in Europe that was apparently incorrectly identified as counterfeit).

Finally, although OSHA's Office of Maritime Enforcement is looking into this matter and would issue a "Hazard Alert" or other appropriate safety information if warranted, to date we have found all reports of counterfeit shackles in service in the United States to be unsubstantiated or incorrect.

Respectfully,
Stephen Butler, Director
Office of Maritime Enforcement
U.S. Department of Labor - OSHA
200 Constitution Ave., N.W. - Room N3610
Washington, D.C. 20210