

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
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