

MMS questions	Comments received	MMS response
(b) Are there other standards for offshore cranes that may be appropriate for MMS to incorporate as part of MMS' regulations?	All commenters with the exception of one responded "no" to this question. One commenter stated that MMS should accept cranes certified in accordance with the requirements of the American Bureau of Shipping (ABS) Certification of Cranes (ABS 1991).	MMS reviewed the ABS standard and, while we recognize that there are some similarities between ABS and API Spec 2C, we do not think that ABS is as widely accepted or recognized as an industry standard for cranes on OCS fixed platforms.
(c) When should MMS require all cranes on OCS fixed platforms to be fully compliant with API Spec 2C?	Most commenters said that many cranes cannot become compliant with API Spec 2C for a number of reasons (<i>i.e.</i> , engineering data not available, some cranes used offshore are not pedestal cranes so they cannot comply with API Spec 2C, etc). Even if you could retrofit some of the cranes the costs would exceed the benefits. A couple of commenters said MMS should grandfather older cranes under any new regulations.	MMS understands that there are many types of cranes working on fixed platforms on the OCS. The final rule clarifies that the only cranes that must meet the requirements of API Spec 2C are: <ul style="list-style-type: none"> • If a fixed platform is installed engineering data after March 17, 2003, all cranes on the platform must meet the requirements of the American Petroleum Institutes's Specification for Offshore Cranes (API Spec 2C), incorporated by references as specified in 30 CFR 250.108. • All cranes manufactured after March 17, 2003, and installed on a fixed platform, must meet the requirements of API Spec 2C, incorporated by reference as specified in 30 CFR 250.108. Except for these cases, the final rule does not prohibit the use of cranes that do not meet the requirements of API Spec 2C.
(d) Is a 1-year transition period enough time for industry to comply with the change proposed in 30 CFR 250.108(c)?	One commenter stated that 1 year should offer enough time to comply if MMS is willing to accept as "existing" any cranes that had been ordered prior to the date of the final rule. Several commenters stated that the 1-year transition period is inadequate and will not allow for a systematic approach for retrofitting pre-1983, older model, and existing mechanical cranes with the required anti-two block safety device.	MMS revised the final rule to provide 2 years instead of 1 year for installing the anti-two block safety device on all existing cranes because the proposed 1-year transition period did not allow adequate time for all lessees to install the anti-two block device on the necessary cranes.
(e) Should MMS establish a requirement similar to the U.S. Coast Guard (USCG), which requires cranes to be installed according to an approved crane plan and inspected and load tested by an Agency-approved third party when the crane is installed?	One commenter stated that it used a third-party crane servicing company to conduct the initial load test for all temporary crane installations and recommended this practice for all initial installations of temporary cranes. One commenter recommended the installation of cranes according to plan approved by a qualified engineer but third-party witnessing was not necessary. Another said API RP 2D adequately addresses requirements for new crane installations. Another period out the crane manufacturer or crane manufacturer's qualified agent should perform the installation, inspection, and load testing of new cranes. The commenter also saw no value in a third party witnessing the installation because it does not perform any type of inspection other than a walk-around, visual type of inspection.	The final rule does not require the retrofitting of any cranes to the specifications of API Spec 2C. This final rule does not require an approved crane plan or third-party inspection for the installation of cranes. As pointed out by several commenters, API RP 2D does address load testing for the installation of new cranes placed in service, cranes that are being permanently relocated, and rental cranes after each rig-up or relocation. However, MMS believes that the installation of rental cranes and the relocation of cranes are issues that warrant additional discussions with operators, crane manufacturers, crane service companies, and other interested parties. MMS will be having discussions with interested parties after the publication of this final rule.
(f) Should MMS require all new cranes for installation on OCS fixed platforms to have an API monogram on the nameplate of the crane as evidence of certification of anti-two block safety device?	Several commenters pointed out that manufacturers that apply the API monogram to the nameplate are warranting that they have an API license and that the construction of the crane complies in <i>all</i> details to API Spec 2C (not limited just to certification of the anti-two block safety devices).	MMS understands that all manufacturers that participate in the monogram program must meet all requirements set forth in API Spec 2C, including evidence of certification of the anti-two block safety devices. The API monogram is strictly voluntary and MMS has no plans to make this program a requirement.