



Miller MightyLite Inspection and Re-Certification Policy

To clarify the Miller Fall Protection policy on required annual factory re-certification, Miller Fall Protection does not require the Miller MightyLite SRLs to be returned to their factory, or any other authorized service center for annual re-certification unless involved in a fall. Our labels and instructions indicate that the user should inspect the equipment upon each use and if the unit fails the user inspection, the unit should be returned for inspection and service to Miller Fall Protection or an authorized service center. Our recommendations are to follow our inspection criteria and the pertinent OSHA mandatory guidelines on "Inspection" of personal fall arrest systems. The OSHA guidelines can be found in 29 CFR 1910.66, Appendix C and OSHA 1926.502, subpart M as well as in ANSI A10.14 and ANSI Z359.1-98. To assist the user, we provide basic operation and inspection guidelines located on page 7, 8 and 9 of the MightyLite user instructions (see attached).

Miller Fall Protection stands behind its statement that we do not require the MightyLite Self-Retracting Lifeline product line to be returned to the manufacturer or its authorized service centers for annual factory recertification. The product(s) must be removed from service, inspected and serviced by an authorized Miller Fall Protection Service Center if subjected to fall arrest forces and/or does not pass the mandatory inspection requirements set forth by OSHA.

We hope this clarifies our position regarding the MightyLite inspection and service requirements. If you have questions, please feel free to contact our Technical Service Department at 1-800/873-5242.

(9/23/99)