

BELL SYSTEM SAFETY RESULTS PLAN

SECTION II

RECORDING AND REPORTING OCCUPATIONAL INJURIES AND ILLNESSES
FEDERAL REGULATIONS

CONTENTS	PAGE
1. GENERAL	1
2. LOG OF OCCUPATIONAL INJURIES AND ILLNESSES	2
3. SUPPLEMENTARY RECORD OF OCCUPATIONAL INJURIES AND ILLNESSES	3
4. SUMMARY OF OCCUPATIONAL INJURIES AND ILLNESSES	4
5. OSHA SURVEY	4

1. GENERAL

1.01 This section contains information regarding Part 1904 of Title 29, Code of Federal Regulations—Recording and Reporting Occupational Injuries and Illnesses.

1.02 **Recordkeeping Under Approved State Plans:** As stated in Section 1904.10 of Title 29, "Records maintained by an employer and reports submitted pursuant to, and in accordance with, the requirements of an approved State Plan under Section 18 of the Act shall be regarded as compliance with this Part 1904."

1.03 **Penalties:** As stated in the Act, "Whoever knowingly makes any false statement, representation, or certification in any application, record, plan, or other document filed or required to be maintained pursuant to this Act shall, upon conviction, be punished by a fine of not more than \$10,000, or by imprisonment for not more than 6 months, or by both."

1.04 **Variance from Recordkeeping Requirements:** The AT&T petitioned for, and re-

ceived from, the Department of Labor a variance from recordkeeping requirements. The following is an excerpt from the Federal Register, Document 72-10672, filed July 11, 1972.

DEPARTMENT OF LABOR

Bureau of Labor Statistics

OFFICE OF ASSISTANT COMMISSIONER
FOR OCCUPATIONAL SAFETY AND HEALTH
STATISTICSNotice of Variance From
Recordkeeping Requirements

In accordance with Section 6(e) of the Williams-Steiger Occupational Safety and Health Act of 1970 (29 U.S.C. 656), and 29 CFR 1904.18(g), notice is hereby given that the American Telephone & Telegraph Co. (AT&T) has been given permission to maintain certain records in a manner different from that set forth in 29 CFR Part 1904.

AT&T has for many years kept records for its field operations on the basis of occupational groups subject to comparable hazard exposure and has appropriately petitioned for permission to continue this procedure contending that it provides the most useful statistics for the evaluation of accidents incurred by its employees and that conversion of its methods which apply to over 16,000 establishments to conform to the establishment basis required by 29 CFR Part 1904 would be unduly costly.

After carefully considering the petition the contentions contained therein have been determined to be well founded and it has therefore been granted.

The full petition is available for public inspection and copying at the Office of Occupational

PLAINTIFF'S EXHIBIT

ATT-239

LLA 001391

Safety and Health Statistics, Room 3818, 441 G Street NW, Washington, DC 20212. Signed at Washington, DC, this 6th day of July 1972.

Thomas J. McArdle
Assistant Commissioner for
Occupational Safety and
Health Statistics

2. LOG OF OCCUPATIONAL INJURIES AND ILLNESSES

2.01 **General:** The OSHA regulations require every employer to maintain a log of recordable occupational injuries and illnesses.

(a) OSHA Form 100 was provided for this purpose for calendar years 1972 through 1977. A substitute form, as described in (c) below, was acceptable.

(b) OSHA Form 200 is provided for this purpose for calendar years 1978 and later. A substitute form, as described in (c) below, is acceptable.

(c) Substitute forms, such as printouts from data processing equipment, are acceptable if they are as legible and comprehensible as OSHA Form 200.

2.02 **Individual Logs:** Logs of Occupational Injuries and Illnesses shall be maintained within the Bell System in accordance with the official instructions, with the following interpretations applied:

(a) **Field Forces:** One log shall be maintained for each departmental district organization. The field log location shall be the district office.

(b) **Other Forces:** One log shall be maintained for each building location to which employees report regularly, eg. Headquarters buildings, accounting buildings, etc. One office within the building shall be designated as the building log location.

(c) **Mixed Forces:** Where all or a portion of a field operating district is located in a building which would otherwise be considered a headquarters (eg. Operator Services located in Company or Area Headquarters), the field operating personnel shall be included in the departmental district log and not in the building log.

Note: In no case shall an individual log contain entries for more than one state. Should a

field district include establishments in more than one state, separate logs shall be maintained for each state.

2.03 **Recordable Cases:** Occupational injury and illness cases shall be recorded according to the rules set forth in the official government regulations. Questionable cases shall be recorded on the appropriate log and the facts forwarded through lines of organization to the AT&T, Manager-Safety, for a decision. If the case is ruled not recordable, it shall be stricken from the log.

2.04 **Recordkeeping Methods:** Either of two recordkeeping methods are permitted by OSHA:

(a) **Localized recordkeeping** in which all records are prepared and maintained within the local establishment.

(b) **Centralized recordkeeping** in which the logs, supplementary records, and summaries are prepared and maintained at a central location and copies are forwarded to field localities periodically.

It is anticipated that Bell System Companies will maintain records centrally. Uniform control is vital to this reporting plan, which would be extremely difficult, if not impossible, without centralized recordkeeping.

2.05 Time Requirements:

(a) If the employer is utilizing the localized recordkeeping method, the employer shall enter each recordable occupational injury or illness on the log as early as practicable but no later than 6 working days after receiving information that a recordable case has occurred.

(b) If the employer is utilizing the centralized recordkeeping method, the records must be maintained in compliance with the following two requirements:

(1) At the centralized recordkeeping location, sufficient information is available to complete the log to a date within 6 working days after receiving information that a recordable case has occurred.

(2) At each of the field or building locations described in paragraph 2.02, a copy of the

log (and associated Form K-15) for that location is available which is complete and current to a date within 45 calendar days.

2.04 Updating: If any change occurs in a case already recorded on a log (ie, a relapse, reclassification, etc), the new information shall be entered to supersede the earlier entry. This applies for the entire period the log is retained (current year plus 5-y. or retention period).

(a) The number of absence days and/or the number of restriction days for each case need not be entered on the log nor updated until the final outcome of the case is actually determined except for the annual end-of-year summary.

(b) Year-end requirements for Bell System occupational reports will be similar to OSHA requirements as follows:

(1) If a case is still pending at the end of the year, an estimate must be made for the number of absence days and the number of restriction days for the case. These estimated days must be entered into the Safety Computer System. After that year's data has been removed from the active part of the Safety Computer System's data base, the log will be manually updated for that case until the employee returns to the job or the retention period required by OSHA has elapsed.

(2) Year-end summary reports will include the estimated days for those cases still pending.

(3) If the final outcome of such a pending case is determined within the next year (ie, while the case is still in the active part of the Safety Computer System's data base), a revision should be entered into the Safety Computer System to replace the estimated absence days and restriction days with the actual days involved.

(4) If the final outcome of such a pending case is not determined within the next year, a second estimate should be made for the number of absence days and the number of restriction days for the case at the end of the second year (ie, immediately prior to removing the case from the active part of the Safety Computer System's data base).

2.07 Access to Log: The Log of Occupational Injuries or Illnesses shall not be posted for gen-

eral viewing. It shall remain in the custody of appropriate management personnel to be produced upon demand by authorized Government Officials or for management information.

(a) Federal regulations also require that all employees, former employees, and employee representatives be given access to the Log of Occupational Injuries and Illnesses for any establishment in which the employee is or has been employed.

(b) Due to the Bell System recordkeeping variances, there are many situations where an employee's normal place of reporting is located a considerable distance from the log location, making physical access difficult. The text of the regulation states that the log shall be made available in a reasonable manner and at reasonable times. In those cases where the log location is not convenient to the requesting employee, a copy of the log can be mailed to the employee's supervisor, who can then make it available to the employee.

2.08 Compliance Visits: When an OSHA Compliance Officer asks to see the log during a compliance visit, it shall be delivered to him/her, if possible, without delay. Otherwise, he/she shall be placed in immediate telephone contact with the field or building log location. All information requested by telephone shall be provided verbally and a copy of the log either mailed or delivered later to the officer as requested. To avoid confusion and undue delay, *all management personnel must be aware of this procedure.*

2.09 Retention Period: At the beginning of each calendar year, a new log shall be started for each location described in paragraph 2.02. The log for the previous year shall be closed as of December 31. A copy of each year's log shall be retained at the location involved for a period of 5 years following the year under report. The OSHA Compliance Officer may require past as well as current logs during an inspection.

3. SUPPLEMENTARY RECORD OF OCCUPATIONAL INJURIES AND ILLNESSES

3.01 General: In addition to the Log of Occupational Injuries and Illnesses, a supplementary form containing certain information about each recordable injury or illness is required. OSHA Form

101 is provided for this purpose, but another form is acceptable if it contains, at a minimum, the items of information contained on the reverse side of OSHA Form 101.

3.02 Form K-15: Bell System Employee Injury and Illness Report is an acceptable substitute for OSHA Form 101.

3.03 Time Requirements: Copies of the Supplementary Record, in connection with each recordable injury or illness, must reach both the involved recordkeeping center and the field or building location (as defined in paragraph 2.02) within 6 working days after receiving information that a recordable case has occurred.

Note: The OSHA regulations require that the occurrence of an employment accident, which is fatal to one or more employees or which results in hospitalization of five or more employees, shall be reported to the nearest office of the Area Director of the Occupational Safety and Health Administration, U.S. Department of Labor, within 48 hours. (An approved State OSHA Plan may have a different time requirement.) The reporting may be by telephone or telegraph. Within the Bell System, the initial report shall be by telephone. Whether or not treatment was provided and length of stay in the hospital are not factors to be considered in reporting.

3.04 Retention Period: All Supplementary Records, including reclassifications, relapses, etc, shall be filed with the log to which they relate and retained for 5 years following the end of the calendar year in which they were prepared.

4. SUMMARY OF OCCUPATIONAL INJURIES AND ILLNESSES

4.01 General: A summary of occupational injuries and illnesses shall be prepared at the end of each calendar year.

(a) OSHA Form 102 was provided for this purpose for calendar years 1972 through 1977. Substitutes for OSHA Form 102 were not acceptable.

(b) OSHA Form 200 is provided for this purpose for calendar years 1978 and later. A substitute form, such as a printout from data processing

equipment, is acceptable if it is as legible and comprehensible as OSHA Form 200.

4.02 Individual Summaries: A separate summary shall be prepared for each field or building location described in paragraph 2.02. Where no injuries or illnesses occurred during the year, zeros must be entered on the totals line and the form posted.

4.03 Certification: Each summary shall be certified as true and complete by the individual responsible for the supervision of its preparation. Certification shall be accomplished by affixing a signature, title, and date at the bottom of the summary.

4.04 Posting Locations: OSHA Form 200 shall be folded between column F (Description of Injury or Illness) and column I (Enter Date of Death); only the right-hand portion, columns 1 through 13, shall be posted. Sufficient copies of each summary shall be made for posting in each location within the summary area to which employees report regularly. A copy of the summary shall be posted at every location requiring an OSHA notice poster.

4.05 Time Requirements: All copies of each summary shall be posted no later than February 1 following the calendar year under report and shall remain posted until March 1, after which one copy shall be filed with the log to which it relates and retained for 5 calendar years following the end of the year under report. All additional copies may be destroyed after the posting period.

5. OSHA SURVEY

5.01 General: The OSHA will notify selected employers each year that they are required to file reports based upon the summaries described in Part 4 of this section. Selected employers will receive questionnaires (OSHA Form 200S) indicating the location to be reported. The report is mandatory and must be filed within 21 days of receipt of the questionnaire.

5.02 Report Location: If the report location designated in the mailing address block of OSHA Form 200S involves more than one establishment, the questionnaire will require consolidation of information from all establishments involved.

5.03 Establishment: One establishment shall be counted for each field or building location described in paragraph 2.02.

SAFETY RESULTS PLAN

ISS 7, SECTION II

5.04 Average Number of Employees: The average number of employees for any period shall be determined by adding the numbers at the beginning of each month within the period and dividing by the number of months involved.

5.05 Total Hours Worked: The total hours worked may be estimated by multiplying the average number of employees by an average hours worked figure which has been developed by study

within the local area. This figure may be developed by determining the number of days in a normal schedule for the period, exclusive of holidays and vacations, and applying known absence and overtime percentage factors. This may be a broad gauge estimate based on Area or Company averages.

5.06 Retention Period: Copies of OSHA Form 200S shall be filed with the log to which they relate and retained for 5 years.

40
Page 1

LLA 001395