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Mr. T. S. Davis

Re: Impact Analysis of NJ A 2906

The referred legislation should have minimal impact on AT&T facilities given a reasonable interpretation of certain details left undefined in the proposal.

First, it should be noted that New Jersey falls under the Federal Occupational Safety and Health Administration (OSHA) regulations which have a provision allowing pre-emption of authority for occupational health issues. Thus, the OSHA standard of 29 CFR 1910.1001 would probably take precedence if ever challenged.

The major undefined item is given in Section 2c. "at levels in excess of maximum levels set by the State." In our experience of asbestos monitoring for numerous AT&T locations, we have noted that where asbestos-containing insulation is not disturbed, the levels do not exceed 0.1 fibers/cm³. This is the criteria used by OSHA to define an "asbestos exposure." Given that the "maximum levels set by the State" are not substantially different, we should not have any buildings requiring asbestos abatement.

The major expense would probably occur from Section 3a., whereby "Within 60 days of the effective date of this act every employer shall contract with a licensed inspector to conduct an inspection of the building in which the business of the employer is conducted to determine the existence of any asbestos hazard." Presumably this would require inspection of all buildings with more than 10 employees constructed prior to 1978. As I am not familiar with any "licensed inspector" by the State, I cannot specify what the charges would be for the inspection. One could probably assume several hundred dollars per building unless the State would permit buildings previously monitored by

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