

Lastly, if employees using the **Grip System** should experience repetitive motion injuries (RMIs), the employer would be required to implement the elements for an RMI program found in GISO Section 5110(b):

- (b) Program designated to minimize RMIs. Every employer subject to this section shall establish and implement a program designed to minimize RMIs. The program shall include worksite evaluation, control of exposures which have caused RMIs and training of employees.

Based on the demonstration and information provided in your letter and video as submitted, the Division believes the **Grip System** furniture moving tool could comply with these GISO sections and therefore could have merit in reducing potential injuries. Printed instructions must address employee training, weight or furniture configuration limitations, foot protection and prevention of RMIs as outlined in GISO Sections 3328, 3556 and 5110. Since uneven floors or ground surfaces and uneven loading of the two straps could reduce the safety and mechanical advantage of the **Grip System**, this should also be included.

Please be aware that a Division interpretation/acceptance letter is intended only to evaluate if the machine, equipment, tool or process meets Title 8 Safety Order requirements. Division acceptance letters related to California safety and health regulations may or may not be accepted by Fed/OSHA or other states with their own occupational safety and health programs. Division acceptance letters are not to be construed as an endorsement of the product and should not be represented as such on any brochures or advertisements.

Any further questions regarding this matter may be directed to Staff Senior Safety Engineer William Loupe in the Anaheim office at (714) 939-8479.

Sincerely,



Ray A. Rooth, PE  
Principal Safety Engineer

RAR/wl

Cc: J Howard, Chief  
Len Welsh, Deputy Chief  
Safety Staff