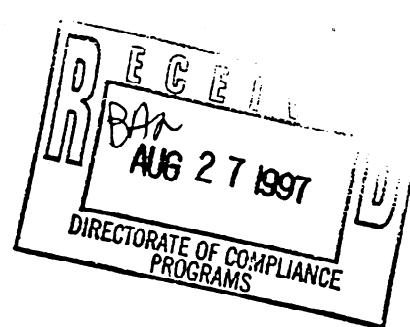


CSC Services

August 21, 1997



John B. Miles  
Occupational Health and Safety Administration  
Director of Compliance  
200 Constitution Ave. N.W. #3468  
Washington D.C. 20210



CSC Credit Services, as many other companies of the 90's, is facing many changes in the work place. What used to be traditional commercial office sites are rapidly becoming private home offices.

I understand OSHA has no drafts in progress to cover telecommuting or home base work environments according to Helen Rogers within your staff.

CSC is currently in the process of placing some of our sales executives in home office environments in lieu of leasing space in commercial complexes. The sales executives office is generally a single room within the home which would have a desk, chair, file cabinet, business phone, desk top or lap top computer, printer and a fax machine. I have the following questions and/or concerns:

- What is CSC 's obligation to compliance within the work environment?
- Is CSC responsible for compliance with the home itself?
- Is CSC required to do periodic compliance inspections in the home? (Which may include safety, health, fire, and environmental)
- What would be OSHA's inspection procedures in a private home?
- Does CSC have to include these home locations in file regarding record keeping on the OSHA 200 logs?

Areas of compliance concerns would include the following but may not be limited to:

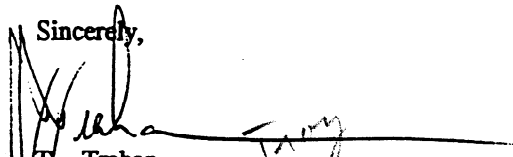
- Worksite analysis
- Hazard prevention
- Training (Can it be in written form?)
- Ergonomics
- Lighting
- Cooling, heating and ventilation
- Asbestos
- Chemicals or toxic materials with the home itself
- Would MSDS's be required
- Fire and possible explosion hazards
- Possible lockout tag out in other equipment that may be in the home
- Confined spaces
- Bloodborne pathogen exposures
- Means of ingress and egress
- PPEs
- Emergency plans

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- Medical assistance services
- First aid kits and training
- Lead levels in old paints
- ADA compliance

In the event you would like to contact me, my phone number is (281)878-5026. I look forward to your response. I feel that employers need guidance from OSHA in this rapidly growing area.

Sincerely,

  
W. Trahan  
CSC Credit Services