device. In light of the ANSI/ASSE Z359.0-2012 definitions, OSHA believes that stating, as in the proposal, that another name for an RDS is "controlled descent device" may be confusing. Therefore, OSHA removed that statement in the final definition. To further clarify the final definition and distinguish it from the terms in ANSI/ASSE Z359.0-2012, OSHA added language identifying components of a typical RDS.

Second, OSHA added language to the final rule specifically excluding industrial rope-access systems from the final definition of "rope descent system." OSHA received several comments recommending that the term "rope descent system" include industrial rope access systems, either as part of rope descent systems or as a new section (e.g., Exs. 129; 205; 355-7; 347). One commenter said that rope descent systems are a type of industrial rope access system (Ex. 362). However, some commenters believe the definition of "rope descent system" already includes industrial rope access systems (Exs. 69; 72; 122; 168; 178). For example, the American Wind Energy Association (AWEA) said they use industrial rope access systems as rope descent systems for repair and maintenance of wind turbines (Ex. 178). AWEA recommended that the definition of, and requirements for, rope descent systems should incorporate and reference the Society of Professional Rope Access Technicians (SPRAT) and the International Rope Access Technicians Association standards, which AWEA said "are much more developed" than the ANSI/IWCA I -14.1-2001 standard.

In light of the comments, not only does the final definition clarify that rope descent systems do not include industrial rope access systems, but also final §1910.27, Scaffolds and rope descent systems, explains that the final rule does not cover industrial rope access systems. OSHA agrees, as SPRAT pointed out, that while industrial rope access systems may use equipment similar to rope descent systems (e.g., anchorages, body harnesses, lifelines), they are