JACKSON TELECOM LLC

Fiber Optic Construction Safety Policy

Document Type	Health, Safety & Environmental Manual
Prepared For	Prime Contractor Review / Internal Safety Program
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Effective Date	5/3/26
Revision	Final Prime Version

Prepared as a job-site safety policy and full HSE program for fiber optic construction, aerial work, underground work, fiber pulling, bucket truck operations, trenching/excavation, vehicle safety, emergency response, environmental protection, forms, logs, and fiber splicing operations.

Important: This manual is a company safety program template based on OSHA construction and general industry requirements and should be reviewed for each project, state requirement, contract specification, and site-specific hazard before use.

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1. OSHA Compliance and Safety Policy

Jackson Telecom LLC is committed to providing a safe and healthful workplace for employees, crew leads, subcontractors, visitors, and authorized personnel on company-controlled job sites. This program establishes policies and required procedures for telecom construction, aerial fiber placement, underground work, trenching, bucket truck use, ladder work, fiber pulling, splicing, vehicles, tools, emergency response, and related operations.

Safety is a condition of employment and contract work. No deadline, production target, or customer request is more important than protecting life, health, property, utilities, and the public. Employees must perform work in compliance with OSHA standards, Jackson Telecom LLC rules, prime contractor requirements, and site-specific instructions.

No job is so urgent that it cannot be performed safely. Unsafe conditions must be corrected before work continues. All employees are authorized to stop work when unsafe conditions exist, and retaliation for using stop work authority is prohibited.

- Zero fatalities and zero serious injuries.
- Zero lost time incidents.
- 100 percent required PPE compliance.
- 100 percent completion of daily JSA/tailboard forms before field work begins.
- Weekly safety communication through toolbox talks or crew briefings.
- Prompt correction and documentation of identified hazards.

2. Roles and Responsibilities

The safety program is built on top-down and bottom-up accountability. Management must provide resources, supervisors must implement controls in the field, employees must follow safe work practices, and subcontractors must comply with company and prime contractor requirements.

The highest-ranking HSE responsible person for Jackson Telecom LLC is the Owner / Operations Manager, Ronald Jackson. Management may assign field responsibilities to foremen, crew leaders, supervisors, safety officers, competent persons, or authorized operators, but the company remains responsible for program oversight and enforcement.

3. Management Responsibilities

Management is responsible for establishing, maintaining, communicating, and enforcing this safety program. Management must provide resources for training, safe equipment, PPE, documentation, incident response, inspections, corrective actions, subcontractor compliance, and continuous improvement.

Management will review incidents, near misses, inspection findings, corrective actions, safety meeting records, equipment inspections, training records, and prime contractor feedback. Management will update procedures when new hazards, new work scopes, new equipment, new OSHA expectations, or new contract requirements are introduced.

- Communicate safety expectations to employees and subcontractors.
- Provide PPE and safety equipment required for assigned tasks.
- Ensure employees receive safety orientation and job-specific training.
- Maintain safety records required by company policy, OSHA, insurance, and contract requirements.
- Stop unsafe work and support employees who stop unsafe work in good faith.

4. Supervisor / Crew Lead Responsibilities

Supervisors and crew leads are responsible for daily implementation of safety requirements in the field. They must ensure employees understand the work plan, hazards, controls, PPE, emergency procedures, and documentation requirements before work begins.

Supervisors must actively monitor the job site. They must verify fall protection, traffic control, trench protection, utility locates, equipment condition, fiber disposal, public protection, and housekeeping. When conditions change, the supervisor must pause work, update the JSA, communicate new controls, and verify understanding before work resumes.

- Conduct JSA or tailboard meeting before work starts.
- Inspect work areas, tools, vehicles, and equipment before use.
- Stop unsafe work immediately.
- Report incidents, near misses, hazards, and deficiencies promptly.
- Coach employees and document repeated violations.

5. Employee Responsibilities

Employees are responsible for following safety rules, participating in training, inspecting their own equipment and PPE, and reporting unsafe conditions. Employees must never perform work for which they are not trained or authorized.

Employees must report hazards, incidents, near misses, injuries, vehicle accidents, property damage, environmental spills, defective equipment, missing PPE, and unsafe conditions immediately. Employees must ask questions when instructions are unclear and must stop work when conditions are unsafe.

- Follow all safety policies, procedures, and JSAs.
- Use required PPE at all times.
- Report hazards, incidents, and unsafe conditions immediately.
- Participate in training and safety meetings.
- Stop work when unsafe conditions exist.

6. Public Protection

Employees must prevent unauthorized persons from entering active work areas. Work zones must be controlled using cones, signage, barriers, flaggers, spotters, vehicles, or other site-specific controls when needed.

Materials must not block sidewalks, driveways, exits, hydrants, traffic lanes, emergency access, or public access unless approved controls are in place. Open holes, handholes, vaults, trenches, ladders, cable reels, and equipment must be guarded from public exposure.

7. Job Safety Analysis (JSA) Program

Jackson Telecom LLC utilizes a Job Safety Analysis process on every job site to identify hazards before work begins and establish safe work procedures. The JSA breaks each job task into steps, identifies hazards associated with each step, and establishes controls to eliminate or reduce risk.

A JSA must be completed before the start of each job or shift, when job conditions change, when weather or site conditions change, when new equipment or tools are introduced, after incidents or near misses, and after a stop-work event. No employee may begin field work until the JSA has been reviewed and signed.

Controls must follow the OSHA-recognized Hierarchy of Controls: elimination, substitution, engineering controls, administrative controls, and PPE. Higher-level controls must be used where practical before relying on PPE alone.

- Define the job task and location.
- Break the job into major steps.
- Identify hazards for each step including falls, electrical contact, struck-by, caught-between, trench collapse, traffic, tools, fiber shards, weather, and public exposure.
- Select controls for each hazard.
- Review with all crew members and require signatures.

- Update the JSA when conditions change.

8. Personal Protective Equipment (PPE) Program

Jackson Telecom LLC requires all workers to use PPE appropriate to the hazards present on the job site. PPE is the last line of defense and must be selected, worn, maintained, and inspected correctly. Before work begins, the foreman or lead technician must evaluate the task, location, traffic exposure, overhead hazards, fiber shards, power tools, electrical exposure, weather, noise, and equipment being used to determine whether additional PPE is required.

PPE must fit properly, be maintained in safe condition, and be inspected before use. Damaged, contaminated, altered, expired, or defective PPE must be removed from service immediately. Fall protection equipment involved in a fall must be removed from service and evaluated before reuse.

- Hard hat meeting applicable ANSI requirements.
- Safety glasses with side shields or face shield where required.
- High-visibility vest or shirt when exposed to traffic, equipment, or public work zones.
- Work gloves suitable for task, including cut-resistant gloves for fiber/cable handling.
- Safety-toe footwear with slip-resistant soles.
- Fall protection harness/lanyard for elevated work and bucket work.
- Hearing, face, electrical, or respiratory protection when required by hazard assessment.

9. Job Site Safety and Housekeeping

Before work begins, the foreman or lead technician must inspect the site for hazards. This includes checking access, parking, material storage, traffic flow, pedestrians, weather, power lines, unstable ground, animals, aggressive persons, public exposure, emergency access, and work area control.

A clean job site is a safe job site. Crews must remove trash, fiber scraps, cable pieces, packaging, water bottles, tape, lashing wire, sharp objects, and unnecessary debris from the work area. Housekeeping is required throughout the shift, not only at the end of the day.

At the end of each job, the site must be restored. Sidewalks, driveways, yards, handholes, poles, and roads must be left safe and clean.

10. Traffic Control

Any work near roads, driveways, sidewalks, parking lots, or public access areas requires proper traffic control. Cones, signs, flaggers, arrow boards, barriers, high-visibility clothing, vehicle positioning, and spotters must be used when needed.

Workers must never assume drivers can see them. Work vehicles should be parked to protect the crew when possible, with hazard lights, strobes, or warning devices activated when appropriate. Traffic control must be adjusted when job conditions, traffic volume, visibility, weather, or pedestrian access changes.

11. Electrical and Power Line Safety

Fiber optic cable may not carry electricity, but job sites can still be extremely dangerous because fiber work is often performed near power lines, poles, energized equipment, conductive hardware, strand, lashing wire, bucket trucks, metal tools, ladders, and existing utilities.

Workers must maintain safe clearance from power lines and treat all overhead lines as energized unless confirmed otherwise by the proper utility or qualified authority. No worker may move, lift, install, lash, pull, or handle anything near power lines unless clearance has been verified and the work method is safe.

Metal tools, strand, lashing rods, bucket trucks, ladders, cable, and hardware can conduct electricity. Workers must stop work and notify supervision if the work plan creates uncertainty around electrical clearance or energized equipment.

12. Aerial Construction Safety

Aerial work includes working from bucket trucks, aerial lifts, ladders, poles, strand, and elevated positions. Before aerial work begins, the crew must inspect poles, strand, anchors, guy wires, clearances, road exposure, weather, power hazards, and public access.

Bucket truck operators must inspect the truck before use. Outriggers must be used when required. Workers in buckets must wear fall protection when required and must never climb out of the bucket onto poles, roofs, or strand unless specifically authorized, protected, and trained.

Ladders must be placed on stable ground, secured when needed, and set at the correct angle. Workers must maintain three points of contact and never overreach.

13. Bucket Truck / Aerial Lift Safety

Only trained and authorized employees may operate a bucket truck or aerial lift. Training must be equipment-specific and include operation, inspection, hazards, emergency lowering, fall protection, electrical safety, tip-over prevention, overhead hazards, and public protection.

Daily pre-operation inspection includes vehicle tires, brakes, lights, mirrors, steering, horn, backup alarm if equipped, fluid leaks, windshield, registration/insurance requirements, boom controls, hydraulic hoses, structural damage, pins, leaks, outriggers, emergency lowering, platform gate, manufacturer placards, harness/lanyard, fire extinguisher, first aid kit, cones, wheel chocks, and communication device.

Park on stable and level ground when possible. Engage parking brake, set wheel chocks, activate warning lights, inspect ground conditions, deploy outriggers as required, use outrigger pads where needed, set traffic control before elevating near roadways, and verify clearance from overhead lines and structures before moving the boom.

- Wear required fall protection and connect to approved anchor.
- Keep both feet on the platform floor.
- Do not stand on bucket rails, boxes, ladders, or makeshift platforms.
- Do not exceed lift capacity.
- Do not move the truck with the boom elevated unless designed and allowed by manufacturer and OSHA requirements.
- Do not operate during lightning, high winds, or unsafe weather.

14. Electrical Contact Procedure for Bucket Trucks

If a bucket truck or aerial lift contacts an energized line, the operator should remain in the bucket or vehicle if possible, warn others to stay away, call 911, and avoid touching the equipment and ground at the same time. The crew must secure the area and keep all personnel and the public away until the utility or emergency responders confirm the hazard is controlled.

If fire or another life-threatening condition forces exit, the operator should jump clear without touching the equipment and ground at the same time, land with feet together, and shuffle or hop away with feet together to reduce step-potential exposure. Employees must not attempt untrained electrical rescue.

15. Ladder Safety Program

Ladder work must be avoided when a safer method, such as an aerial lift, is practical and available. When ladders are used, employees must select the proper ladder type, length, and duty rating for the task. Fiberglass ladders must be used near electrical hazards, and metal ladders must not be used near energized lines or equipment.

Before each use, inspect rails, rungs, feet, spreaders, locks, ropes, pulleys, labels, and overall condition. Ladders with cracks, broken rungs, missing feet, bent rails, oil/grease contamination, or any defect must be tagged out of service and removed from use.

Extension ladders must be placed on stable, level ground, set using the 4:1 rule, extended at least 3 feet above the landing where applicable, secured at the top when possible, and used while maintaining three points of contact. Workers must face the ladder while climbing and keep their belt buckle between the side rails.

- Do not carry tools in hands while climbing; use a tool belt or hoist.
- Do not use a stepladder as a straight ladder.
- Do not stand on the top step or cap.
- Do not move a ladder while occupied.
- Use cones, barriers, signage, or spotters when ladders are near traffic or public paths.

16. Underground Work and Utility Locates

Before any digging, boring, trenching, hand-hole work, potholing, conduit access, or ground disturbance, all utilities must be properly located through the required locate process. In Michigan this may include Miss Dig / 811 and any project-specific utility coordination.

Crews must verify locate markings, compare marks to the work plan, confirm locate ticket status, and use soft digging, hand digging, or other approved methods when exposing utilities. Workers must watch for gas lines, electric lines, water lines, sewer, existing fiber, unstable soil, traffic, hazardous atmospheres, and confined-space hazards.

Open holes, handholes, vaults, and excavations must be protected from public access. Work must stop if the locate status is unclear, expired, missing, or inconsistent with field conditions.

17. Trenching and Excavation Safety

A competent person must be present for trenching and excavation work. The competent person must be able to identify existing and predictable hazards, classify soil when required, inspect excavations, and take prompt corrective action.

Employees may not enter trenches 5 feet or deeper unless protected by sloping, benching, shoring, shielding, or another approved protective system, unless allowed by OSHA based on competent person determination. Trenches less than 5 feet may also require protection if hazardous conditions exist.

Spoil piles and materials must be kept at least 2 feet from trench edges. Safe access and egress, such as ladders, must be provided within 25 feet of workers in trenches where required. Excavations must be reinspected after rain, vibration, changes in conditions, or other hazards.

- Conduct pre-job briefing and JSA.
- Verify locate tickets and markings.
- Inspect soil, water, weather, spoil piles, nearby traffic, structures, and equipment loads.
- Install required protective system before entry.
- Keep employees out from under suspended loads.
- Do not attempt untrained rescue in a cave-in; call 911 and keep others away.

18. Fiber Pulling Safety

When pulling fiber through conduit, crews must inspect the route, verify conduit condition, check pulling tension, protect the cable jacket, and use proper communication between pull points. The pulling plan must account for conduit condition, bends, obstructions, pull length, cable specifications, tension limits, lubrication, and crew positioning.

Workers must keep hands, fingers, clothing, and tools clear of pinch points, capstans, rollers, winches, blowing machines, pull ropes, and cable reels. No worker may stand inside a loop of cable or rope. Crews must never exceed manufacturer pulling tension or use damaged pulling equipment.

Communication between feed points, pull points, equipment operators, and spotters must be clear before and during the pull. Work must stop if tension becomes excessive, communication is lost, the cable jacket is damaged, a worker is exposed to pinch points, or equipment operates unsafely.

19. Fiber Splicing Safety

Fiber splicing requires strict eye, hand, and cleanliness safety. Workers must never look directly into the end of a fiber unless it has been verified dark with proper test equipment. Invisible laser light may be present and can damage eyes.

Fiber shards must be treated like glass. All scraps must be placed in a marked fiber disposal container. Workers must not eat, drink, smoke, rub eyes, or handle contact lenses while working with fiber until hands are washed.

Fusion splicers, ovens, batteries, alcohol, cleaners, cleavers, blades, sharps, and small tools must be handled carefully. Work areas must be clean, dry, ventilated, and free of combustible materials. Splicing trailers or workstations must be organized to prevent slips, cuts, electrical issues, and contamination.

20. Tools, Equipment, Owned/Leased Equipment and Materials

All tools must be inspected before use. Damaged ladders, cords, slings, ropes, straps, PPE, splicers, cleavers, drills, saws, hand tools, bucket trucks, winches, pulling equipment, traffic control devices, and other equipment must be removed from service.

Only trained workers may operate bucket trucks, boring equipment, compressors, winches, fusion splicers, generators, and other specialized equipment. Equipment must be used only for its intended purpose and according to manufacturer instructions.

Jackson Telecom LLC owns and leases equipment and materials necessary for fiber optic construction operations. The company maintains systems to ensure equipment and materials meet applicable health, safety, and environmental requirements, including safety specifications, manufacturer compliance, proper handling, inspections, maintenance, certifications, and documentation.

- Bucket trucks and service vehicles.
- Ladders and climbing equipment.
- Lashers and cable placement tools.
- Pulling equipment, winches, and reels.
- Underground drilling and boring equipment.
- Fusion splicers, cleavers, test equipment, and hand tools.

21. Vehicle and Driving Safety

Only employees with a valid license, company approval, and training may operate company vehicles. Drivers must immediately report license restrictions, suspensions, medical limitations, unsafe vehicle conditions, accidents, tickets, or any condition affecting safe driving.

Drivers must wear seatbelts and require passengers to wear seatbelts. Texting, handheld phone use, reckless driving, aggressive driving, speeding, racing, driving under the influence, or driving while fatigued or medically impaired is prohibited.

Before driving, inspect tires, brakes, lights, turn signals, mirrors, horn, windshield, wipers, fluid leaks, backup alarm if equipped, fire extinguisher, first aid kit, cones, registration/insurance, and load security. Unsafe vehicles must not be operated.

- Avoid backing when possible.
- Conduct a 360-degree walk-around before backing.
- Use a spotter when available, especially around public areas or tight spaces.
- Back slowly with windows down when practical.
- Stop immediately if the driver loses sight of the spotter or is unsure.

22. Weather Safety

Work must stop or be delayed during lightning, high winds, heavy rain, ice, unsafe visibility, flooding, extreme heat or cold, or any weather condition that creates an unsafe work environment. Supervisors must monitor weather before and during outdoor operations.

Aerial work is especially dangerous during wind, storms, ice, or lightning. Underground work is especially dangerous during flooding, muddy conditions, poor trench stability, water accumulation, and low visibility. Vehicle operations may also be affected by snow, ice, rain, fog, and poor road conditions.

Crews must lower equipment, secure materials, protect open holes or work areas, and move to safe shelter when weather creates an unacceptable hazard.

23. Hazard Communication / WHMIS

Jackson Telecom LLC complies with OSHA Hazard Communication standards and aligns with WHMIS principles where applicable. Employees must understand hazardous chemicals used or encountered during company work, labels, Safety Data Sheets (SDS), safe handling, PPE, spill response, and emergency procedures.

The company will maintain a list of hazardous chemicals used or stored. Examples may include gasoline, diesel, oils, lubricants, adhesives, solvents, cleaners, alcohol, battery-related chemicals, and other materials used in vehicles, equipment, or field work.

All chemical containers must be labeled. Labels must not be removed or defaced. Secondary containers must be labeled unless used immediately by the person who transferred the chemical and permitted by OSHA rules. SDS must be available to employees for hazardous chemicals.

- How to read labels and pictograms.
- How to access and read SDS.
- Chemical hazards present in the work area.
- Required PPE and safe handling procedures.
- Spill response and emergency actions.
- What to do when a new chemical is introduced.

24. Environmental Protection Program

Jackson Telecom LLC is committed to minimizing environmental impact during all operations. The environmental protection program reduces the impact of company operations on soil, water, air, public property, utilities, and surrounding communities.

Environmental controls include proper disposal of fiber scraps, cable materials, packaging, and construction debris; spill prevention and response; protection of public property and utilities; minimizing ground disturbance; controlling fuel, oil, and chemicals; and complying with local, state, environmental, project owner, and prime contractor requirements.

Fiber optic shards can puncture skin and eyes. Employees must collect fiber scraps immediately, use designated containers, never leave shards on the ground or work surfaces, and dispose of waste according to company and project requirements.

- Keep job sites clean and organized.
- Prevent fuel, oil, and chemicals from reaching soil, drains, waterways, or public areas.

- Dispose of waste lawfully.
- Control fiber shards and sharp debris.
- Restore work areas as required by contract or permit.
- Report environmental incidents immediately.

25. Spill Prevention and Response

Vehicles and equipment must be inspected for leaks. Fuel, oil, and chemicals must be stored in closed containers. Drip pans or secondary containment should be used when appropriate. Spill absorbent should be available when fuel, oil, or chemicals are used or transported.

If a spill occurs, stop the source if safe, warn nearby personnel, contain the spill with absorbent or other controls, prevent material from reaching drains, soil, waterways, or public areas, notify the supervisor, dispose of contaminated materials properly, and document the incident and corrective actions.

26. Emergency Action Plan

The emergency action plan establishes procedures for medical emergencies, fire, severe weather, electrical contact, trench collapse, vehicle accidents, public hazards, violence/aggressive persons, environmental incidents, utility strikes, and equipment failures.

In an emergency, stop work immediately, assess the situation without placing yourself in danger, call 911 when needed, provide exact location and nearest cross street, notify supervisor, secure the area from additional exposure, provide first aid only if trained and safe, and account for personnel.

Each active crew should have a communication device, first aid kit, fire extinguisher where required, cones/warning devices, and emergency contact information. Crew leaders must ensure the job address or location is known before work begins.

27. First Aid Procedures

First aid kits must be available on job sites, in vehicles, or in work areas as appropriate. Supplies must be inspected and restocked as needed. Employees must know where first aid supplies are located before work begins.

At least one trained first aid provider should be present when required by job conditions, client rules, or regulatory requirements. Injuries must be treated promptly and reported immediately. For serious injury, loss of consciousness, chest pain, severe bleeding, fall from height, electric shock, trench collapse, amputation, eye injury, or uncertain serious condition, call 911.

Workers must not move a seriously injured person unless necessary to prevent further harm. Employees providing first aid must protect themselves from additional hazards and use available barriers or PPE when appropriate.

28. Fire Protection and Prevention

Workers must identify fire hazards and control ignition sources. Fire extinguishers must be available in vehicles and work areas when required. Employees must be trained in basic fire response and extinguisher use where assigned.

Combustible materials, trash, fuel, oils, alcohol, cleaners, batteries, chargers, generators, fusion splicers, ovens, and power tools must be controlled. Hot components and ignition sources must be kept away from combustible materials when necessary.

If a fire occurs, alert personnel, call 911, evacuate, and use a fire extinguisher only if trained, the fire is small, and escape is available. Do not fight large fires.

29. Fall Protection Program

Jackson Telecom LLC requires fall protection whenever employees are exposed to fall hazards. OSHA construction fall protection standards generally require employees to be protected from falls when working 6 feet or more above a lower level where covered by the standard. Fall protection may include guardrail systems, safety net systems, personal fall arrest systems, positioning systems, controlled access zones, or other approved systems depending on the task and site conditions.

Personal fall arrest systems must be inspected before use. Harnesses, lanyards, lifelines, hooks, D-rings, connectors, and anchor points must be checked for cuts, burns, broken stitching, deformation, corrosion, missing labels, impact damage, excessive dirt, or other defects. Damaged equipment must be removed from service immediately.

Fall protection planning must include rescue. If a worker falls and is suspended, the crew must call 911, notify the supervisor, prevent additional exposure, and use trained rescue procedures or equipment only if qualified.

- Use proper harness fit with straps adjusted and secured according to manufacturer instructions.
- Tie off only to approved anchor points.
- Maintain 100 percent tie-off where required.
- Avoid swing fall hazards and keep lanyards as short as practical.
- Do not tie off to ladders, guardrails, conduit, wire, fiber cable, handrails, or unapproved structures.
- Remove damaged fall protection equipment from service immediately.

30. Drug and Alcohol Program

Jackson Telecom LLC maintains a drug and alcohol-free workplace to protect employees, subcontractors, customers, pedestrians, motorists, and the public. Fiber construction involves traffic exposure, aerial work, underground hazards, power line exposure, cable pulling equipment, heavy tools, sharp fiber, vehicles, and bucket trucks.

Employees and subcontractors must report to work fit for duty and free from impairment. The use, possession, sale, transfer, distribution, concealment, or being under the influence of alcohol, illegal drugs, controlled substances, or misused prescription medication while on duty, on a job site, in a company vehicle, or operating equipment is prohibited.

Pre-employment, reasonable cause, and post-incident testing may be required when allowed by law, company policy, client requirements, or safety-sensitive work conditions. Testing must not be used as retaliation or as a threat to discourage injury, illness, near miss, hazard, or unsafe condition reporting.

31. Incident Reporting and Investigation

All injuries, illnesses, first aid cases, near misses, vehicle accidents, property damage, equipment damage, utility strikes, electrical contacts, falls, public complaints, environmental spills, and unsafe conditions must be reported immediately to management.

Immediate response includes stopping work, making the area safe, preventing additional injuries, providing first aid only if trained and safe, calling 911 for serious injury or emergency conditions, notifying the supervisor, preserving the scene when safe, taking photos if available, and completing incident documentation within 24 hours.

Investigations must focus on facts and prevention, not blame. Supervisors should interview witnesses, photograph the scene, collect equipment information, review training records, review JSA, identify root causes, and assign corrective actions. The company must not stop at “employee error” as the only cause; it must ask why the unsafe behavior or condition occurred.

- Fatalities must be reported to OSHA within 8 hours when applicable.
- Inpatient hospitalization, amputation, or loss of an eye must be reported to OSHA within 24 hours when applicable.
- Corrective actions must be specific, assigned, documented, and verified.

32. OSHA Recordkeeping and Record Retention

Jackson Telecom LLC will maintain injury and illness records in accordance with OSHA 29 CFR Part 1904 when applicable. OSHA recordkeeping uses OSHA Form 300, OSHA Form 300A, and OSHA Form 301, or equivalent forms, for recordable work-related injuries and illnesses.

Records must be accurate, factual, and completed promptly after management is notified of a recordable injury or illness. The purpose of recordkeeping is to identify hazards, improve safety performance, support corrective action, and provide documentation for management, employees, auditors, insurance representatives, and prime contractors when appropriate.

Jackson Telecom LLC will not discipline, threaten, or retaliate against employees for reporting injuries, illnesses, near misses, or unsafe conditions.

- OSHA injury and illness logs: retained for minimum 5 years when applicable.
- Training records: maintained for duration of employment or project requirement.
- Inspection and audit records: retained for minimum 1–3 years or contract requirement.
- Equipment inspection and maintenance records: maintained per regulatory, manufacturer, insurance, and company requirements.
- Corrective action records: maintained until closure and retained for review.

33. Subcontractor Safety Compliance

All subcontractors working under Jackson Telecom LLC must comply with the company HSE program, OSHA standards, and all applicable prime contractor requirements. Subcontractor compliance is required before and during work.

Subcontractors must provide proof of required training, certifications, qualifications, insurance, equipment readiness, and client-required documentation when requested. They must participate in JSAs, toolbox talks, orientations, safety meetings, inspections, audits, corrective actions, and incident investigations.

Jackson Telecom LLC reserves the right to stop subcontractor work, reject unsafe personnel or equipment, require corrective action, remove subcontractors from the job site, or terminate subcontractor work for safety violations or non-compliance.

- Must follow Jackson Telecom LLC HSE program.
- Must provide proof of training and certifications.
- Must participate in JSAs and safety meetings.
- Subject to inspections, audits, and corrective actions.

34. Safety Enforcement and Disciplinary Policy

Jackson Telecom LLC enforces all safety policies to ensure compliance and protect all personnel. Written safety rules have no value unless they are communicated, followed, supervised, and enforced consistently.

Failure to follow safety procedures may result in disciplinary action. Serious violations, including willful disregard for safety rules, bypassing fall protection, working impaired, fighting, unsafe equipment operation, ignoring electrical hazards, falsifying records, or refusing to stop unsafe work, may result in immediate removal from the job site.

Disciplinary action will be applied consistently and fairly based on the severity of the violation, prior conduct, risk level, client requirements, and whether the act was intentional, repeated, or created serious danger.

- Verbal warning.
- Written warning.
- Removal from site.
- Termination of employment or contract.

35. HSE Orientation, Training, and Competency

Jackson Telecom LLC maintains a comprehensive HSE orientation and training program for all new hires and newly hired or promoted supervisors. Training ensures employees understand hazards, safe procedures, emergency actions, PPE requirements, and company expectations before performing work. No employee may perform a task they are not trained and authorized to perform.

New employees must receive safety orientation before field work. Orientation includes company safety policy, stop work authority, PPE, JSA process, incident reporting, emergency action, HazCom, drug and alcohol policy, and key telecom hazards. New workers are trained on job-specific hazards including aerial work, underground operations, fiber pulling, and splicing.

Training is not complete until understanding is verified. Verification may include written questions, verbal questions, demonstration, observation, or supervisor sign-off. Training records must identify the verification method.

- New hire safety orientation.
- Job-specific task training.
- Fall protection training.
- Bucket truck/aerial lift training for authorized operators.
- Ladder safety.
- Trenching awareness and competent person training if assigned.
- PPE training.
- HazCom training.
- Vehicle safety.
- Incident reporting and emergency procedures.
- Weekly toolbox talks.

36. Safety Meetings and Toolbox Talks

Jackson Telecom LLC maintains structured safety meetings to ensure all employees, supervisors, and new hires are properly informed, trained, and aligned with company safety expectations. Field supervisors are required to conduct regular safety meetings to review job hazards, enforce safety procedures, and communicate expectations.

All crews must participate in daily or task-based safety meetings before work begins. These meetings include review of the JSA, identification of job-specific hazards, control measures, PPE requirements, weather conditions, emergency procedures, public protection, traffic control, and any lessons learned from recent incidents or near misses.

All safety meetings must be documented with attendance records, topics discussed, and supervisor signatures. Records must be maintained and available for review by management and prime contractors.

37. Internal HSE Inspections, Audits, and Corrective Actions

Jackson Telecom LLC conducts regular internal HSE inspections and program audits to ensure compliance with OSHA standards, company policies, and prime contractor requirements. Inspections identify hazards before incidents occur and verify job sites, tools, equipment, vehicles, PPE, and work practices.

Field inspections include job site conditions, PPE compliance, fall protection usage, equipment condition and operation, traffic control setup, housekeeping practices, hazard identification, environmental controls, JSA completion, and subcontractor compliance. Inspections are performed daily by supervisors through visual checks, periodically by management, and as needed based on job complexity or risk level.

Any deficiencies identified during inspections or audits must result in corrective actions. Hazards and deficiencies are documented, communicated to management and responsible personnel, assigned with deadlines, tracked until full resolution, and closed with verification of correction.

38. Safety Performance and Continuous Improvement

Jackson Telecom LLC actively measures safety performance and improves the safety system over time. Prime contractors often look for evidence that safety is managed, tracked, reviewed, and improved.

Leading indicators measure prevention activity before incidents occur, including JSAs completed, inspections completed, toolbox talks conducted, training completed, near misses reported, and corrective actions closed. Lagging indicators measure events that already happened, including recordable injuries, first aid cases, lost time injuries, vehicle accidents, property damage, environmental incidents, and equipment damage.

Management should review safety data periodically to identify repeated hazards, high-risk tasks, training gaps, equipment issues, recurring employee behavior, and subcontractor trends. Reviews should result in documented corrective actions, retraining, procedure updates, or equipment improvements.

39. OSHA References Used for Policy Alignment

This policy is company-specific and designed for job-site use. OSHA references used for alignment include 29 CFR Part 1904 injury and illness recordkeeping; OSHA 29 CFR 1910 General Industry Standards; OSHA 29 CFR 1926 Construction Standards; OSHA PPE, fall protection, aerial lift, ladder, excavation, hazard communication, emergency action, vehicle, and safety training requirements; and applicable OSHA construction safety principles.

Project-specific requirements may add additional obligations. Jackson Telecom LLC will review and update this policy as operations, OSHA requirements, prime contractor requirements, or job hazards change.

- OSHA 29 CFR 1910 - General Industry Standards.
- OSHA 29 CFR 1926 - Construction Standards.
- 29 CFR 1926.21 - Safety Training and Education.
- 29 CFR 1926.501, 1926.502, 1926.503 - Fall Protection.
- 29 CFR 1926.453 - Aerial Lifts.
- 29 CFR 1926.1053 - Ladders.
- 29 CFR 1926 Subpart P - Excavations.
- 29 CFR 1910.1200 - Hazard Communication.
- 29 CFR 1910.132, 1910.133, 1910.135, 1910.136 - PPE.
- 29 CFR 1910.38 and 1926.35 - Emergency Action Plans.
- 29 CFR 1904 - Injury and Illness Recording and Reporting.
- 29 CFR 1926.601 - Motor Vehicles.

40. Field Safety Forms and Logs

The following forms are included for daily field use, audit support, OSHA-aligned documentation, and prime contractor compliance documentation. Forms may be printed and completed by hand or recreated electronically for digital use.

Form 1 - Daily JSA / Tailboard Safety Meeting

Job / Project _____

Date / Time _____

Location _____

Crew Lead _____

Weather _____

Item	OK	N/A	Corrective Action / Notes
Work scope reviewed with crew	[ ]	[ ]	
Hazards identified for each work step	[ ]	[ ]	
Fall protection needs reviewed	[ ]	[ ]	
Electrical hazards / overhead lines reviewed	[ ]	[ ]	
Traffic control needs reviewed	[ ]	[ ]	
Underground utilities / 811 status reviewed	[ ]	[ ]	
Emergency plan and address reviewed	[ ]	[ ]	
Required PPE available and inspected	[ ]	[ ]	
Crew members signed before work began	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 2 - Incident Report

Employee Name _____

Date / Time _____

Location _____

Type of Event: Injury / Near Miss / Vehicle / Property / Environmental _____

Supervisor Notified / Time _____

Item	OK	N/A	Corrective Action / Notes
Scene secured	[ ]	[ ]	
First aid provided if needed	[ ]	[ ]	
911 called if needed	[ ]	[ ]	
Photos taken	[ ]	[ ]	
Witness statements collected	[ ]	[ ]	
Equipment involved removed from service if needed	[ ]	[ ]	
Root cause analysis completed	[ ]	[ ]	
Corrective action assigned	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 3 - Near Miss Report

Reported By _____

Date / Time _____

Location _____

Potential Severity: Low / Medium / High _____

Item	OK	N/A	Corrective Action / Notes
Near miss clearly described	[ ]	[ ]	
Hazards identified	[ ]	[ ]	
Immediate correction completed	[ ]	[ ]	
Supervisor notified	[ ]	[ ]	
Corrective action assigned	[ ]	[ ]	
Crew retrained or briefed if needed	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 4 - Bucket Truck / Aerial Lift Inspection

Vehicle / Unit # _____

Operator _____

Date _____

Item	OK	N/A	Corrective Action / Notes
Tires, brakes, lights, mirrors inspected	[ ]	[ ]	
Hydraulic hoses and leaks checked	[ ]	[ ]	
Boom structure checked	[ ]	[ ]	
Controls tested	[ ]	[ ]	
Emergency lowering system tested	[ ]	[ ]	
Outriggers and pads checked	[ ]	[ ]	
Platform gate/anchor point checked	[ ]	[ ]	
Harness/lanyard inspected	[ ]	[ ]	
Fire extinguisher and first aid kit present	[ ]	[ ]	
Cones/chocks available	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 5 - Ladder Inspection Checklist

Ladder ID _____

Inspector _____

Date _____

Item	OK	N/A	Corrective Action / Notes
Rails free of cracks or bends	[ ]	[ ]	
Rungs/steps secure and undamaged	[ ]	[ ]	
Feet/pads in good condition	[ ]	[ ]	
Locks/spreaders operate properly	[ ]	[ ]	
Labels readable	[ ]	[ ]	
No oil/grease contamination	[ ]	[ ]	
Correct ladder type for task	[ ]	[ ]	
Fiberglass ladder used near electricity	[ ]	[ ]	
Removed from service if defective	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 6 - Trenching / Excavation Checklist

Project / Location _____

Competent Person _____

Date / Time _____

811 / Miss Dig Ticket # _____

Item	OK	N/A	Corrective Action / Notes
Utilities located and marks verified	[ ]	[ ]	
Soil and trench conditions inspected	[ ]	[ ]	
Protective system installed if required	[ ]	[ ]	
Access/egress provided	[ ]	[ ]	
Spoil pile at least 2 feet from edge	[ ]	[ ]	
Water accumulation controlled	[ ]	[ ]	
Employees protected from suspended loads	[ ]	[ ]	
Atmosphere tested if required	[ ]	[ ]	
Public access controlled	[ ]	[ ]	
Inspection repeated after changes/weather	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 7 - PPE Inspection Log

Employee _____

Date _____

Task _____

Item	OK	N/A	Corrective Action / Notes
Hard hat inspected	[ ]	[ ]	
Safety glasses inspected	[ ]	[ ]	
Gloves inspected	[ ]	[ ]	
High visibility clothing worn	[ ]	[ ]	
Safety footwear worn	[ ]	[ ]	
Harness/lanyard inspected if used	[ ]	[ ]	
Hearing/face/respiratory protection reviewed if needed	[ ]	[ ]	
Defective PPE removed from service	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 8 - Vehicle Inspection Checklist

Vehicle # _____

Driver _____

Date _____

Item	OK	N/A	Corrective Action / Notes
Tires and wheels checked	[ ]	[ ]	
Lights/signals checked	[ ]	[ ]	
Brakes checked	[ ]	[ ]	
Mirrors and windshield checked	[ ]	[ ]	
Seatbelts working	[ ]	[ ]	
Horn and backup alarm checked if equipped	[ ]	[ ]	
Leaks checked	[ ]	[ ]	
Tools/materials secured	[ ]	[ ]	
Fire extinguisher and first aid kit available	[ ]	[ ]	
Cones/triangles available	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 9 - Training Record

Employee Name _____

Training Topic _____

Trainer _____

Date _____

Verification Method: Written / Verbal / Demonstration / Observation _____

Item	OK	N/A	Corrective Action / Notes
Employee attended full training	[ ]	[ ]	
Employee demonstrated understanding	[ ]	[ ]	
Questions answered	[ ]	[ ]	
Retraining needed if applicable	[ ]	[ ]	
Record filed	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 10 - Safety Inspection / Audit Form

Inspector _____

Date _____

Location _____

Item	OK	N/A	Corrective Action / Notes
JSA completed	[ ]	[ ]	
PPE compliance observed	[ ]	[ ]	
Tools/equipment safe	[ ]	[ ]	
Traffic control adequate	[ ]	[ ]	
Fall protection adequate	[ ]	[ ]	
Housekeeping acceptable	[ ]	[ ]	
Environmental controls adequate	[ ]	[ ]	
Emergency equipment available	[ ]	[ ]	
Corrective actions documented	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 11 - Environmental Spill / Release Report

Reported By _____

Date / Time _____

Location _____

Material Spilled _____

Item	OK	N/A	Corrective Action / Notes
Source stopped if safe	[ ]	[ ]	
Area secured	[ ]	[ ]	
Spill contained	[ ]	[ ]	
Supervisor notified	[ ]	[ ]	
Drain/waterway protection completed	[ ]	[ ]	
Cleanup materials disposed properly	[ ]	[ ]	
Photos taken	[ ]	[ ]	
Corrective action assigned	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

Form 12 - Corrective Action Log

Issue / Hazard _____

Identified By _____

Date Identified _____

Responsible Person _____

Due Date _____

Item	OK	N/A	Corrective Action / Notes
Corrective action described	[ ]	[ ]	
Employee/crew notified	[ ]	[ ]	
Action completed	[ ]	[ ]	
Completion verified	[ ]	[ ]	
Procedure updated if needed	[ ]	[ ]	
Training completed if needed	[ ]	[ ]	

Notes / Details

Employee / Inspector Signature: _____ Date: _____

41. Emergency Contacts

Company Emergency Contact:
Jackson Telecom LLC
Owner / Operations Manager: Ronald Jackson
Phone: 404-343-5618
Email: jacksontelcomllc@gmail.com

Emergency Services: 911

Crew leaders must ensure emergency contact information is available before work begins. Workers must know the job address or closest location description so emergency responders can be directed to the site quickly.

42. Management Commitment & Signature

Jackson Telecom LLC management is fully committed to enforcing this safety policy and ensuring that all work is performed in compliance with OSHA standards, industry best practices, prime contractor requirements, and site-specific safety controls.

Management will provide proper training, require PPE, enforce safety rules, lead by example, hold workers and subcontractors accountable, stop unsafe work, investigate incidents, review hazards, correct deficiencies, and continuously improve safety procedures. Safety is a core value of Jackson Telecom LLC and will not be compromised for production.

Owner / Operations Manager: Ronald Jackson

Company: Jackson Telecom LLC

Management Signature: _____

Date: _____

43. Worker Acknowledgment

By signing below, I confirm that I have reviewed and understand Jackson Telecom LLC Fiber Optic Construction Safety Policy and HSE Manual. I agree to follow all safety rules, wear required PPE, participate in training, follow JSAs, report hazards, and stop work if conditions are unsafe.

Employee Name: _____

Signature: _____

Date: _____

44. Subcontractor Acknowledgment

By signing below, the subcontractor confirms that it has reviewed Jackson Telecom LLC HSE requirements and agrees to comply with company policies, OSHA requirements, prime contractor rules, JSAs, safety meetings, inspections, audits, and corrective actions.

Subcontractor Company: _____

Authorized Representative: _____

Signature: _____

Date: _____