

From: Tim Groce [tim@laskey-clifton.com]
Sent: Thursday, October 26, 2006 5:04 PM
To: zzMSHA-Standards - Comments to Fed Reg Group
Subject: RIN 1219-AB44

Received 10/26/06 MSHA/OSRV

Mr Stickler

Please let me start by congratulating you on your appointment to the head of the Mine Safety & Health Administration. As the person in charge of safety issues with Laskey-Clifton I wish to express my concern with the new plan to increase citations. I work with three agencies for employee safety, Oregon OSHA, Federal OSHA, and MSHA. I need to preface this with the fact that we have a remarkable safety record with only one injury in five years at our rock facility. Our construction division has such a low injury rate over three years that our workers compensation carrier says we have the lowest modifier available. I need to make it clear that my objection is not about safety but about the manner you want to achieve it. The approach to cite into compliance is not the most effective way to accomplish safe work environment. Oregon OSHA tried this approach and about ten years ago they hired a new head of the department and they switched their emphasis to training and education. They still run enforcement but they have a remarkable training program for employers and employees. When MSHA was started they used to have training for operators but that program was cut to allow more enforcement plans come on board. Your new method of increased citations will work as a cash generator but I would hope you aren't just after a bigger budget. I would hope you really want to have fewer lives lost and fewer injuries. Creating a financial hardship for smaller operators such as ourselves does not create a safer work environment. It will cause more small businesses to go bankrupt and the larger companies will monopolize the industry. Thank you for your time.

Sincerely
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