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From: Eric Pirttima [mailto:eric.pirttima@venturedesignservices.com]
Sent: Thursday, January 08, 2009 9:22 AM
To: 'GoodGuidance@dol.gov'; 'patricia.silvey@dol.gov'
Cc: 'Chirdon, David C - MSHA'
Subject: Comments for MSHA PPL No. P08

Subject: Comments for MSHA Program Policy Letter No. P08 -
Guidance for Compliance with Post-Accident Two-Way Communications and Electronic Tracking Requirements of the MINER Act

My name is Eric Pirttima. I am the Business Development Manager for MineTracer, the wireless communications and tracking system from Venture Design Services, Inc.

First, I want to thank MSHA for issuing the long-awaited PPL guidance. While there are several vendors with MSHA IS-approved (30 CFR Part 23) wireless communications and/or tracking systems, most mine operators have been hesitant to install these safety systems without specific performance requirements.

Through our interactions with mine operators over the past three years, we have observed that most people in the industry are not comfortable evaluating wireless systems. This is the basis of my comment and recommendation to MSHA.

How can MSHA assure that systems meet the performance requirements outlined in this guidance? While the MSHA intrinsic safety approval process is extremely rigorous, painstaking, and thorough, there is no functional performance evaluation defined for these systems. To help assure the safety of miners underground, the ability of a given system to meet the performance guidance is critically important. The actual performance with respect to coverage area, standby power, survivability, and the details like determining direction of travel, redundant signal pathways, and system capacity should be evaluated for each system. Without this, the mine operators are forced to rely on the vendor's stated performance.

To fully serve the purpose of the MINER Act, I strongly recommend that MSHA evolve the guidance to specific regulation as soon as possible and also establish a functional performance evaluation process. MSHA functional evaluations could readily take place in a test mine or existing reference site.

Sincerely,

Eric Pirttima
Venture Design Services, Inc.

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