From: fiyahh@aol.com [mailto:fiyahh@aol.com]
Posted At: Thursday, January 08, 2009 7:42 PM
Posted To: Microsoft Office Outlook Embedded Message
Conversation: Comments on MSHA PPL Guidance on Wireless for MINER Act
Subject: Comments on MSHA PPL Guidance on Wireless for MINER Act

Hello MSHA:

I am responding to the new PPL on Wireless Communications and Electronic Tracking Systems Guidance

I disagree strongly with the following issues in the guidance.

A) Miners who are injured or threatened and must try to escape a mine accident will be in escapeways. Requiring a reader every 2000 feet is ridiculous and will not allow them to be tracked in a way that may aid their rescue. I am aware of technology that can do much better and we should demand this better performance.

B) These systems should work longer on batteries than what is written in the guideline PPL. I watched the Sago incident unfold for many hours and had great sorrow for the men and their families. 24 hours for the system and 12 hours for the portable is way too short a time.

C) This so-called guidance is not providing anything firm that the mines must follow. It says here are some ideas, but you can do differently. We have seen what the mines will do differently, and that is how we have gotten some of these fatalities. Hard core regulations are needed, otherwise we will lose more miners.

D) What does the deadline mean about having an emergency plan by June? When will the systems be installed, that should be the question. The mines will drag this on forever unless there is some kind of firm deadline for implementation.

E) I have heard that some manufacturers lie about what their tracking and comm products can do. Your regulations should help stop this, maybe by requiring the manufacturers to pass a test or evaluation.

Thank you for allowing me to comment.

Sincerely,

Lucy Watmore
Nashville, TN

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