From: Derek Buckley [mailto:djbuckley@gmail.com] **On Behalf Of** Derek J. Buckley
Posted At: Thursday, January 08, 2009 6:45 PM
Posted To: Microsoft Office Outlook Embedded Message
Conversation: comments on Wireless Communications and Electronic Tracking Systems Guidance
Subject: comments on Wireless Communications and Electronic Tracking Systems Guidance

I was recently asked to read and evaluate the technical accuracy of a MSHA issued Program Policy Letter concerning wireless communications and electronic tracking systems for underground mines. After doing so, I felt I should express my thoughts directly to MSHA as well.

Two-Way Communication System and **Electronic Tracking System**

The minimum standby power durations are inadequate. With today's modern devices and battery technology there is no reason a system cannot be mandated to operate for *days* after an incident instead of 12 or even 24 hours. Recent mine accidents have been followed by numerous rescue attempts for days afterward based on the supposed location of trapped miners. Accurate location data and/or actual communications with said miners would drastically improve the chances of rescue.

Electronic Tracking System

While 200 feet location resolution in active and strategic areas is not unreasonable (sub 100 feet resolution is achievable and to me very prudent) the idea of two thousand feet intervals in escapeways is absurd. "Escape" implies an emergency and determining a person's location to within just under a half mile (underground, no less) in such a situation holds little value.

Guidance vs. **Regulation**

The summary states that the PPL is guidance and does not constitute a regulation -- why is this? Human life warrants the most stringent policies. If the intent of the MINER Act is to maximize safety then this PPL is a minimalistic response to the Emergency Response Plan clause, and should be revised into hard requirements based on modern, accurate technological knowledge.

Deadline for Comments

The stated deadline to submit comments such as this is Midnight on January 8, 2009. Technically that is the first instant of the date and the deadline has passed. I hope my input will be considered, as I interpreted the deadline to be inclusive of January 8. (Consider using 11:59pm or 12:01am instead of "midnight").

Thank you for your time.

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