From: Jim Gunnoe [mailto:jgunnoe@americanmineresearch.com]
Sent: Thursday, January 08, 2009 6:48 PM
To: 'GoodGuidance@dol.gov'
Subject: Comments: Fedreg. Doc. E8-29943

We respectfully submit comments in reference to the Draft of PPL No. P08- dated 12/12/2008.

Electronic Tracking System, section 2.a.i.
Requiring that miners be located/tracked within 200 feet in the working section seems to be unrealistic. Maintaining an antenna and reader network within the working section will be difficult at best. Simply knowing which miners are currently in the section area and escape way should be sufficient. This could be accomplished by having readers and/or antennas in the travel way and escape way within 200 feet of the working section.

Electronic Tracking System, section 4.b.
We recommend that text be added to address tags that have battery life expectancies that are measured in terms of years. Continuous automatic battery level reporting to the surface computer should be sufficient for these types.

Electronic Tracking System, section 9.b.ii.
Checking the standby power of the infrastructure components should be more clearly defined. If you fully drain power supply batteries, recovery time has to be considered. We suggest that the standby power function be tested for durations of a few minutes on a weekly basis and that full 24 hour testing be conducted only on selected units at some other greater period. This should also apply to the Two-Way Communication System, section 7.b.ii..

Thank you for your consideration.

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