From: Kelly [mailto:zilagod@hotmail.com]
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Posted To: Microsoft Office Outlook Embedded Message
Conversation: Comment on Program Policy Letter for Miner Act
Subject: Comment on Program Policy Letter for Miner Act

I'd like to address some points I believe are faulty in terms of logic and or reality.

Please define a "fully wireless system". Does fully wireless include electricity transmission cables that would power these devices? We need to realize that even modern cellular phone systems are NOT "fully wireless". All cell towers have power cables connected to them to provide the electricity they need to operate. Cell towers are not wireless in the strictest sense of the word - and likely never will be. Unless we decide that each tower is outfitted with its own power generator IE: a miniature nuclear power plant. Bottom line here is that the infrastructure for any wireless system will in fact be "wired" for its day to day functioning and have a backup solution in case of power failure due to accident or natural causes.
This day to day functioning with a power backup for accidents/natural causes infrastructure for miner tracking does exist currently. The statement that the technology does not exist is not true. It does exist, right now.

Next point. The proposed 2000 foot (nearly 1/2 a mile) requirement in escapeways is not good enough. What happens if there is a geological event that affects the escapeway and miners were in that escapeway when it happened? Will we just say, well they were in the escapeway when it caved in but we aren't sure where because our system only tracks them to a plus or minus 2000 foot area. Why bother having such a system? Because in fact, you will NOT know where a miner is and, such a guideline/system will not help in rescue efforts. The 200 foot requirement for other areas should be applied throughout the mine.

Next point. What is the reasoning behind the guildline of the infrastructure having a run time of 24 hours after a power failure/accident and only 12 hours of use for handheld tracking devices? What happens if there is an accident event at the end of a miners work shift and his handheld device quits working before rescue attempts start and the miner was still on the move? Whatever the proposed guildline is the infrastructure and handheld devices should have the same or very close to the same working duration. I believe 24 hours is fairly weak and both components should be 48 hours minimum.

Lastly. Why have guidelines been issued and not regulations?

QUOTE

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"This notice is announcing the issuance of a Program Policy Letter (PPL) to provide mine operators guidance for implementing the Mine Improvement and New Emergency Response Act (MINER Act) requirements for wireless communications and electronic tracking systems. Material in the guidance does not constitute a regulation."
END QUOTE

Using the word "requirements" in the above statement is silly because in a "guideline" there are NO requirements, only guidelines.