From: Jason Todhunter [mailto:todhunter_jr@hotmail.com]
Posted At: Thursday, January 08, 2009 7:25 PM
Posted To: Microsoft Office Outlook Embedded Message
Conversation: http://www.msha.gov/REGS/FEDREG/NOTICES/2008Misc/E8-29943.asp
Subject: http://www.msha.gov/REGS/FEDREG/NOTICES/2008Misc/E8-29943.asp

January 8, 2009

To Whom It May Concern:

I am writing you to express my concern over the stance you will take in your obligation to define requirements of Government mandated systems, as required by the MINER Act.

With the issuance of the latest MSHA 'guidelines', I feel you missed the mark. Please define the standards these new systems are to have, to ensure issuing in a new era of safety for human life underground. Please set the standards as high as possible.

I believe this can be done in a two ways.

First, please define a consistent tracking distance for both the working areas as well as the escape ways, as both are subject to catastrophic failure. Set the distance no less than +/- 100 feet.

Second, increase the battery run time to last days not hours. If a guy was to work a double shift, and a disaster happens on the end of his shift. Would we not want to ensure he could be tracked up to that point, and beyond if possible? The same system the miners depend on could be by rescuers to aid rescue efforts, but, only if only if post accident back-up battery life is sufficient. Why limit this time on the sake of the battery? We have batteries we all use on a daily basis that last days, months or even weeks.

I believe these will greatly aid in making the most of the efforts of all involved. Your efforts will reflect the intent of the MINER Act. Please set strict standards. Please put some teeth into these regulations, as industry will only meet the minimum requirements. If the specs are set too low, safety will be just as minimally impacted. The safety of lives of those who will depend upon these systems built to the definitions MSHA set may be increased.

Thank you for your time and consideration,
Sincerely,
Jason Todhunter

COMM-26