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From: Chris Lutz [mailto:lutz.c@comcast.net]
Posted At: Wednesday, January 07, 2009 7:14 PM
Posted To: Microsoft Office Outlook Embedded Message
Conversation: Comments on MSHA's policy guidance for MINER Act wireless tracking and communications
Subject: Comments on MSHA's policy guidance for MINER Act wireless tracking and communications

In general, I agree with the guidance stated in this PPL, but have serious concerns about the following four points:

· "Material in the guidance does not constitute a regulation".

o Why is this just a guideline? Mine operators will not adhere to it unless it is enforceable. It would be like "recommending" a car not pass a school bus when the red lights are flashing. Those that care will stop, those that do not could cause loss of life.

· "However, fully wireless communications technology is not sufficiently developed at this time, nor is it likely to be technologically feasible by June 15, 2009."

o Making this statement is like saying wireless cellular phone technology does not exist. In fact the phones are wireless and the base stations are wired together making use of the most efficient appropriate communications media. I know at least one system (MineTracer), uses this same concept. This statement just gives mine operators another excuse to avoid putting in a system.

· "Determining the location of miners in escapeways at intervals not exceeding 2,000 feet"

o This should be 200 feet as well. I know there are systems that can economically accomplish this.

· "Stationary components (infrastructure) should be capable of tracking persons underground during evacuation and rescue efforts, even upon loss of mine power. In many circumstances, the capacity to provide a minimum of 24 hours of continuous tracking operation after a power loss generally should be sufficient."

o This requirement should be at least 48 hours. Just consider the 41 hours of post-accident rescue activity at Sago.

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