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MSHA/OSRV

May 23, 2006

Robert Stone, Acting Director
Office of Standards, Regulations, and Variances
MSHA
1100 Wilson Blvd. Room 2350
Arlington, VA 22209-3939

RE: RIN 1219-AB46

Dear Mr. Stone:

I am a 32 year rank and file coal miner. Over the years I have seen several laws come into play, usually, after a coal miner was injured or killed. It is time to get ahead of the game.

For years I have talked to higher ups at MSHA Tech Support and ETS personnel about these 1 hour Self Contained Self Rescuers (SCSR's) unit to no avail. It took tragedies, Senate hearings, media attention and the UMWA before the agency that is supposed to have our backs, our interest and our health and safety to have to be pushed to look out for what the mine act defines so clearly, our most precious resource "The Miner."

I am listing some mandates I think are some of the mandates that should be looked at:

- Mandate lifelines in both primary and secondary escape ways with a blanket standard in which way the cones are turned.
- Mandate more illumination on escape ways so there is no mix-up on direction of travel.
- Mandate two-way communications with all miners at any given time while underground.
- Mandate safe, dependable and efficient transportation on each working section at all times to facilitate and transport all miners who may have to evacuate when seconds count (and not a scoop bucket).
- Mandate more extensive training and drills to prepare all miners in case of emergency.
- Mandate a more prepared readiness program, supplies etc. in case of any disaster.
- Mandate hands on and more lifelike events and criteria to better prepare miners to react during a mine disaster.

As we look back over the years, one thing that is slipping away is a representative of the miners. The intent was for rank and file miners to travel with AR's of the Secretary, but what is more evident in this day and time is, company personnel has conserved that role.

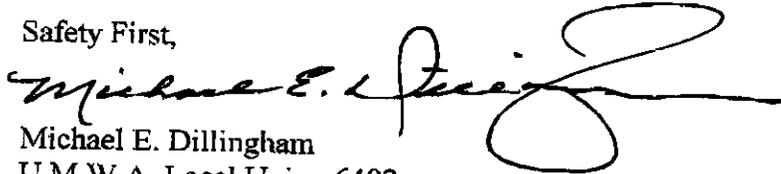
- Mandate that miner's representative be a rank and file miner, with no discrimination or recourse from coal companies.
- Mandate that representative of miners have a role in the new ETS, in that they are covered under the act, and participate in all training and drills that coal operators provide.

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- Mandate all miners will travel each escape way in its entirety every 90 days and alternate time about but will walk it in its entirety at least 1 time per year.
- Mandate mine operators pay the penalties and fines just because they change the name of the Company and move somewhere else.
- Mandate more inspections, and follow ups. Double back on inspections, (they have your patterns figured out).

In closing I would like to say, MSHA, you have our backs our health and safety and our lives in your hands. Do the right thing, get on track for every coal miner in this nation because without you as our protector and enforcer, coal miners will be at the mercy of corporate greed and the time table will turn back to the days of the Killing Fields.

Safety First,



Michael E. Dillingham
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