

From: Mark Johnson
To: [zzMSHA-OSRVRRegulatoryReform](#)
Cc: [Mark Johnson](#)
Subject: MSHA Training
Date: Monday, January 22, 2018 9:46:57 PM

Greetings

I am contacting you with a question and a concern.

I am an independent businessman and work as a safety consultant. My question and concern is why does Chippewa Valley and Wisconsin Indianhead technical school, Hibbing Minnesota Technical School, and other technical schools have employees who provide safety consulting services and MSHA training to the business community? I would like to grow my business but it is difficult to compete with the marketing resources that technical colleges and unions have and are conducting training in direct competition with my business. There are private companies that are perfectly capable of providing these services to employers and in a much more efficient manner. Why are my tax dollars being used to subsidize these services through the state school systems and **federal grant money** provided to these school systems and are not available to the private sector when this training is available in the private sector? This is in direct competition with small private business? Are you in the business of picking winners and losers in the business community, because that is the end result. If you are interested in streamlining costs associated with the public education system, this is an area that could be eliminated. If these school consulting services being used as a profit center, I question the efficiency and the employment of a number of people with all the wages and benefits that are afforded to state employees and the true cost of these services to the taxpayer. It doesn't seem fair. In addition, the standard requires that employees be paid for training time as you well know. What about the unions that train hundreds if not thousands of union employees who are unemployed at the time they receive training and are not being paid. If you want specific instances contact me and I can point them out to you. I look forward to your reply.

Respectfully

Mark

Mark G. Johnson
Custom Industrial Services LLC



CUSTOM INDUSTRIAL SERVICES, LLC
Compliance Solutions for Your Business

715-944-9120.

cis-safety.com