

From: Jonna True
To: [zzMSHA-OSRVRRegulatoryReform](#)
Subject: Regulation changes
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My suggestions would be:

1. Make the PFAS height ruling definitive, i.e. use the 6 ft. rule that OSHA has. Now it is open to the interpretation of the inspector or the mine safety manager. 6 ft. that's it! Citation if you don't comply.
2. Make Part 46 and Part 48 both require a "certified" trainer. The words "competent trainer" are too broad and my 20 plus years in mining make me feel that we do a disservice to New Miners especially by not having a fully qualified trainer in their classroom. I realize that Part 46 can't be removed and that we just use Part 48, but we can make sure that no matter what is being mined, we have the best people possible starting them out. There is a place for "competent" people... every day. No one wants to work with an incompetent person, that is what every Miner should strive to be, the "competent" person so that they get better at safety AND their jobs. The majority of incidents/fatalities in Part 46 point out to me that this is important.

Thank You

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