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To: zzMSHA-OSRVRegulatoryReform
Subject: One Call Does It All
Attachments: ATT00001.txt; ATT00002.txt

For those of us in the West, where we don't have modern day cell phone signal. The "Immediately Reportable Accident & Injury" requirement is unreasonably burdensome.

Even with strategically placed radio repeaters there are still radio dead zones in our mining operation. It may and can take more than 15 minutes to reach a land line.

Over the last 3 years we have been cited twice for not reporting an uncontrolled fire within the 15 minute time frame.

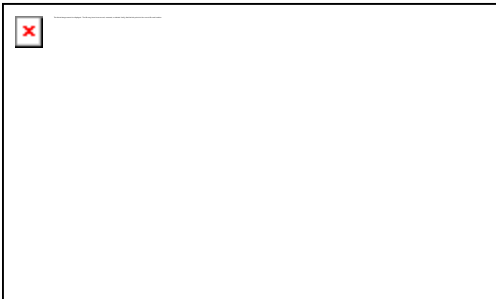
On both occasions our immediate concern was notifying our neighbors and local firefighting agencies.

What help is MSHA going to send if we make a call regarding an uncontrolled grass fire within the 15 minute requirement – none.

We understand the spirit and motivation under which Part 50.10 was initially written.

In our opinion doubling the 15 minutes time frame would not be unreasonable.

Don Kollekowski



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