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To: [zzMSHA-OSRVRegulatoryReform](#)
Subject: Suggested Safety Requirement Changes, including training.
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As they're both a subset group of the Department of Labor: Combine OSHA, MSHA, and DOT into one entity. As they're all life safety issues and they are so similar, combining them would streamline regulations into ONE document, with any real differences noted later on the safety document, CFR.

1. Change the annual Safety Training to a three year event. Companies do a monthly tailgate style meeting anyway, so safety will always be covered.
2. Combine safety training into one core, instead of one set for mining, and one for industrial. Safety is safety. Fall protection is fall protection, eye safety is eye safety, respiratory safety is respirator safety, a pinch point is a pinch point. Any real differences, if any can be explained in the front or other appropriate part of a document.
3. Eliminate exotic degree requirements for instructor trainers and instructors. A masters degree is not going to make a worker even an inkling safer than an instructor with an Associate degree.
4. Eliminate unnecessary courses that may never be used or are irrelevant to a course being taught. Calculus is rarely used, if at all in worker safety training classes, as an example.
5. Change or eliminate the "History of..." OSHA, MSHA. Two hours of Introduction to, is NOT going to make a worker any safer. It is interesting if they are interested in the historical, but it has no connection. If nothing else, teach it to the introductory workers with a periodic refresher, but remove the two hour requirement.
6. OSHA 10 Training modification. Even though OSHA does not approve or disapprove of a course, it is not needed to make it an two day; five hours a day course - with two hours of OSHA, by an overly educated or papered instructor. Break it down to a one day, 1 hour (or less) Basic Orientation/refresher similar to PEC Safeland (tm).
7. Revamp the Inspection, fining requirements of ALL agencies. \$10,000.00 per day is too excessive. Inspect the facility, allow reasonable time to abate the problem, the re-inspect, then fine. Then **collect it. Imagine the government revenue lost for lack of collection!**
8. In Each Department, Region, and smaller groups; consider asking a mid level to low level of employee or personnel, areas they think need to be improved. High level people are concerned with their pay scale, the mid to low are in "the battlefield" and would know. Remember, Napoleon was a corporal, and even Hitler was a low level.

There are more areas to think about, but 8 should be plenty to discuss. As a Safety Professional of over 30 years, I believe these matters will save money and allow more productive workers with better morale. Companies cannot make a positive return on investment with idle hands

Yours for Safety,

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