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**To:** [zzMSHA-OSRVRegulatoryReform](#)  
**Subject:** 15 minute reporting / annual refresher training  
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I think the 15 minute fatality reporting requirement is Ludacris. Most people are way too busy securing a scene, taking care of other employees, notifying emergency services and family members etc. to worry about how much time they have before notifying MSHA. This should be amended to a 24 hour time frame.

8 Hour annual refresher training should be moved to a 2 or 3 year refresher time frame to maintain more legitimate training. Many miners have been in the business for 20 + years and to require 8 hours of essentially the same information proves to be counter-productive. By spacing this training out, miners would view as fresh training as opposed to the same old same old every year, especially with the required topics i.e. miners rights.

MSHA needs to provide more outreach and less enforcement just for the sake of enforcement. MSHA should be reviewing mine safety records and concentrating their efforts on mines with less than favorable records as opposed to those doing a good job with low incidence records.

Thank you.