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**To:** [zzMSHA-OSRVRegulatoryReform](#)  
**Subject:** Refresher Training Class Size Restriction  
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The Annual Refresher Training class size limitation is an antiquated limitation for mine operators.

Limiting class sizes to 25 does not guarantee that all of the miners get the same training and places hardships on larger mining operations. Most Colleges and Universities have auditorium lectures for their student bodies with more than 25 people per class. When we bring in outside lecturers or trainers we require that they stay with us for 9 hours so that they can train 25 different people 8 different times. If allowed to train 200 people in an lecture hall environment the instructors would be able to train on their approved topic for 1 hour (or whatever time has been approved in the training plan) then the outside trainer would be able to leave and the next trainer would take the stage.

It is a logistical nightmare to schedule 300+ people for the annual refresher training and limit the class size to 25. Currently we have 16 classes set up while shutting our mine down for a day of training.

Over the past couple of years we have been training new trainers to ensure that when the annual refresher training is due we have enough certified/approved trainers to complete the training per our approved training plan.

If our institutions of higher education have determined that lecture hall classes work, why can we not roll the same thought process into the mining industry?

Thank you for your time and I welcome your thoughts towards this critical issue that I am sure other mine operators are also struggling with.