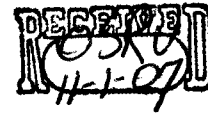


To: MSHA, Office of Standards, Regulations and Variances
1100 Wilson Boulevard, Room 2350
Arlington, Virginia 22209-3939



From: Thomas D. King
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1219-AB56-COMM-6

Date: October 29, 2007

Re: RIN 1219-AB56

The following comments are in reference to the proposed Part 49 Mine Rescue rules. My comments are based on my 30 plus years of Mine Rescue involvement as a Team member and Captain and Teams Trainer. This experience includes state contest championships, a National Mine Rescue Championship, and involvement in mine emergencies, the latest at Aracoma.

I was pleased to see smoke training required for teams. This is important as observed at Aracoma. I would request that teams also be required to have fire fighting training during their annual regiment. Aracoma was also a good example of Coal Mine Rescue teams being prepared to fight Coal mine fires.

49.16 (8) requires the teams station to have a communication system. When I started on Mine Rescue communications were horns and jerking on a 1000 foot rope lifeline. As technology advanced we moved to sound powered 1000 foot lines with head phones for the team and a Briefing Officer. The best technology now is handheld permissible radios. I have been using these exclusively in mine emergencies and underground training for the past five years. Handheld radios allow teams to do exploration work faster with less physical effort. A team will still carry a lifeline with them that can be used if the team enters smoke but does not have to drag a lifeline with them in all locations.

I am not sure when I read the proposed regulations that handheld communications are included and allowed for a team to have in their station in lieu of a communication system with a wired cable lifeline. Since teams are moving toward and purchasing handheld radios for emergencies and handheld radios are allowed in contests a new station can save about \$11,000 dollars if they do not have to purchase a communication system with a wired cable in addition to the handheld radios.

Thank you for your consideration of the comments I have made.

Thomas D King

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