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MSHA/OSRV

-----Original Message-----

From: Derrel @ Mid-State [mailto:derrel@emerytelcom.net]  
Sent: Tuesday, November 22, 2005 1:27 PM  
To: zzMSHA-Standards - Comments to Fed Reg Group  
Cc: Alex Walker  
Subject: RIN 1219-AB41

To Whom It May Concern,

Since the 80s', Coal Companys have implemented a drug free environment into coal mines. I have worked for many of the majors over the past 30 years. All have in-place policies regarding the use of drugs and acohol in the work place. In working with all other mines in the west, drug and acohol abuse is not as prevelent as everyone thinks. Every mine has a random testing policy in place. Every mine has a suspision clause for required testing. Every mine tests for substances when an employee is involved in a accident or injury of any kind. With the raising costs associated with workmans compensation, libility insurance costs, and ect, most every company has implemented proceedures to stop abuses in underground coal mines. These policies cover notification of legal medications that can cause impairment, and the use of illegal drugs. Therefore, I see no reason for MSHA to become involved in another area that they are not qualified to operate in. The arena of drug abuse and acohol abuse are issues for experts to handle. I view MSHA's involment as another means to issue citations to companys rather than address the issue to a employee. I strongly object to any provision requiring MSHA to implement a rule requiring companies to deal with an issue that they ae already dealing with. Leave it to the experts. I do not believe that the act provides MSHA this particular involmment. Sincerely Derrel Curtis  
General Manager Hidden Splendor Resources Inc.

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