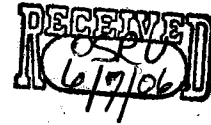


MSHA'S Office of Standards
Regulations and Variances
1100 Wilson Blvd. Room 2350
Arlington, Va. 22209-3939



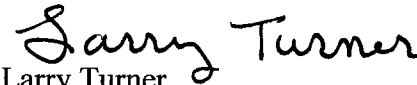
Dear Sir:


RIN 1219-AB46

Enclosed you will find our comments on MSHA'S Emergency Temporary Standard on Mine Evacuation. We would ask that you take these comment under serious consideration.

Thank you
UMWA Local 2245 Safety Committee


Glenn Loggins


Larry Turner


Rickey Dunn

CC; Daryl Dewberry
Tom Wilson

AB46-COMM-24

75-1714(e)

That miners should have the availability o tether themselves together during escapes but it should not be mandatory.

75-1502

States that drills may further provide a more realistic emergency evacuation practice. Should be changed to read that drills shall further provide a more realistic emergency evacuation practice.

75-1714(a)

That we agree in the addition of more SCSRs in the mine, but that MSHA should be more involved in the development of SCSRs that will last longer. Due to the fact that we see possible problems when transferring from SCSR to another.

75-1714-4(c)

That instead of giving mine operators flexibility in determining the location, quantity and type of additional SCSRs stored.

That there be a standardized formula in determining the location, quantity and type of additional SCSRs due to different mining conditions and terrain.

75-381(c) (5)

That all lifelines thru out the coal industry should be standard and the same at all mines.

That the direction cones be the same direction, in that people (sales reps., MSHA and State Inspectors and ect.) travel to different mines thru out the country.

75-381(c) (5) (iii)

That where lifelines cross switches and/or track that they be attached where they can be pulled down by miners escaping by using the lifeline and will retract to their original position due to other miners possible escaping on bus and/or haulage equipment.

75-1714-4(e)

That a device be located on the lifeline to indicate location of additional SCSRs due to zero visibility. Reflected sign would not be adequate in this condition of zero visibility.