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Posted To: Microsoft Office Outlook Embedded Message

Conversation: Comments on Wireless Communications and Electronic Tracking Systems Guidance

Subject: Comments on Wireless Communications and Electronic Tracking Systems Guidance

To Whom it may concern:

The comments below are in response to the following:

Wireless Communications and Electronic Tracking Systems Guidance
Notice of availability of Program Policy Letter;
request for comments.

Fedreg. Doc. E8-29943 - Published December 18, 2008

I express concern in 2 areas:

1) The location accuracy "guideline" seems prone to error. To try and locate someone who may be injured and unresponsive within a 200 foot area that may be inundated with debris, would be extremely difficult and most likely unsuccessful. 2000 feet is absurd. If the technology exists for closer tracking...we should use it.

2) The Battery life "guideline" seems weak as well. We have cell phones, mp3 players and the like that can last 24 hours or more on a charge. Why can't we expect the same out of a life saving device?

Also I am confused as to why the rules are expressed in terms of "guidance"...should they not be mandatory? Guidance will allow for sloppy and inferior implementations. If the intent is to ensure the safety of miners, the guidelines should be regulations that must be adhered to.

Thank you for considering my comments.

Sincerely,

Steve Johnson
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